

---

**PUBLIC EXHIBITS**  
TO THE  
**APPLICATION**  
TO THE  
**BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM**  
BY  
**FIFTH THIRD BANCORP**  
AND ITS SUBSIDIARY BANK HOLDING COMPANY  
FOR PRIOR APPROVAL TO ACQUIRE  
**COMERICA INCORPORATED**

---

**October 28, 2025**

---

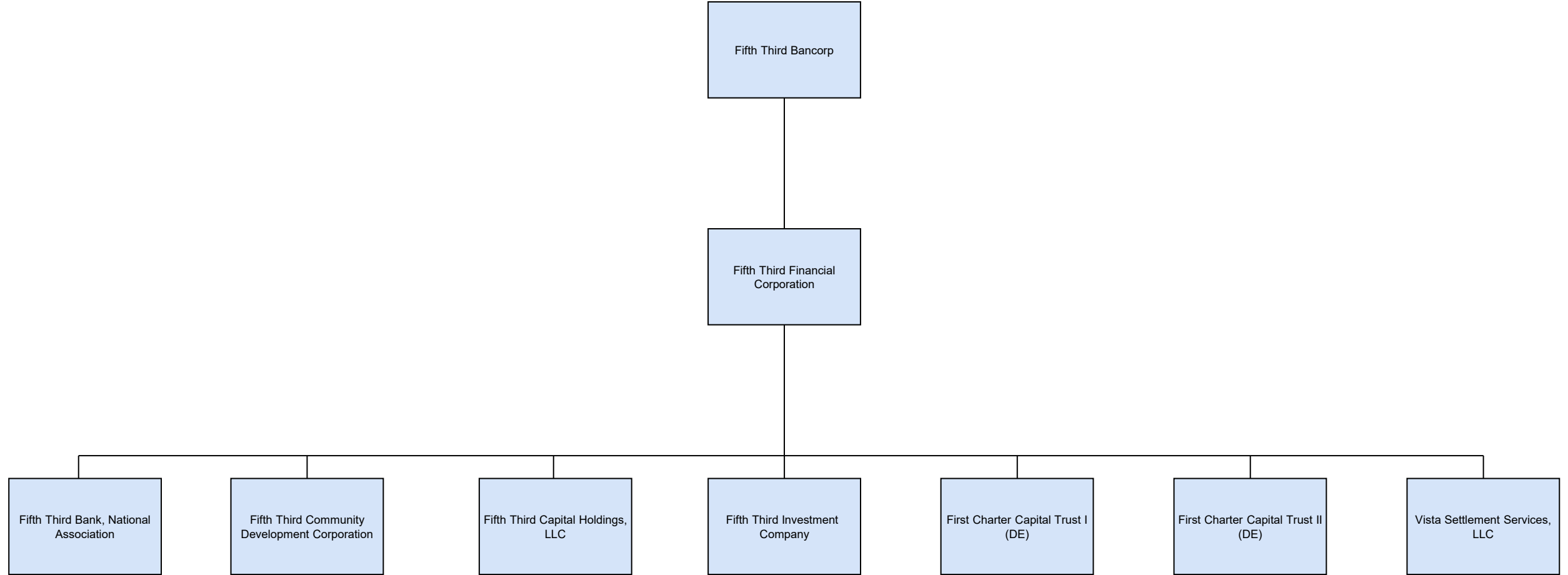
## TABLE OF EXHIBITS

| <b>Public Exhibits</b>                                                                                                                                         | <b>Tab</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| Organizational Chart of Fifth Third, Fifth Third Financial and Fifth Third Bank (Current and Pro Forma) .....                                                  | 1          |
| Agreement and Plan of Merger, dated as of October 5, 2025, by and between Fifth Third, Fifth Third Financial Corporation, Comerica and Comerica Holdings ..... | 2          |
| Agreement and Plan of Merger, dated of October 21, 2025, by and among Fifth Third Bank, Comerica Bank, and Comerica Bank & Trust .....                         | 3          |
| Organizational Chart of Comerica, Comerica Holdings, Comerica Bank and Comerica Bank & Trust .....                                                             | 4          |
| Supplement to Competition Analysis .....                                                                                                                       | 5          |
| Part A of Supplement to Competition Analysis .....                                                                                                             | A          |
| Part B of Supplement to Competition Analysis .....                                                                                                             | B          |
| Part C of Supplement to Competition Analysis .....                                                                                                             | C          |
| Fifth Third Bank Community Reinvestment Act Performance Evaluation, dated July 18, 2022 .....                                                                  | 6          |
| Comerica Bank Community Reinvestment Act Performance Evaluation, dated July 17, 2023 .....                                                                     | 7          |
| List of Comerica Bank and Comerica Bank & Trust Main Offices, Branches .....                                                                                   | 8          |
| Form of Newspaper Notice .....                                                                                                                                 | 9          |
| Fifth Third Bank and Comerica Bank Assessment Areas .....                                                                                                      | 10         |
| List of Fifth Third Bank Main Office and Branches .....                                                                                                        | 11         |
| Description of Comerica Subsidiaries .....                                                                                                                     | 12         |

**Public Exhibit 1**

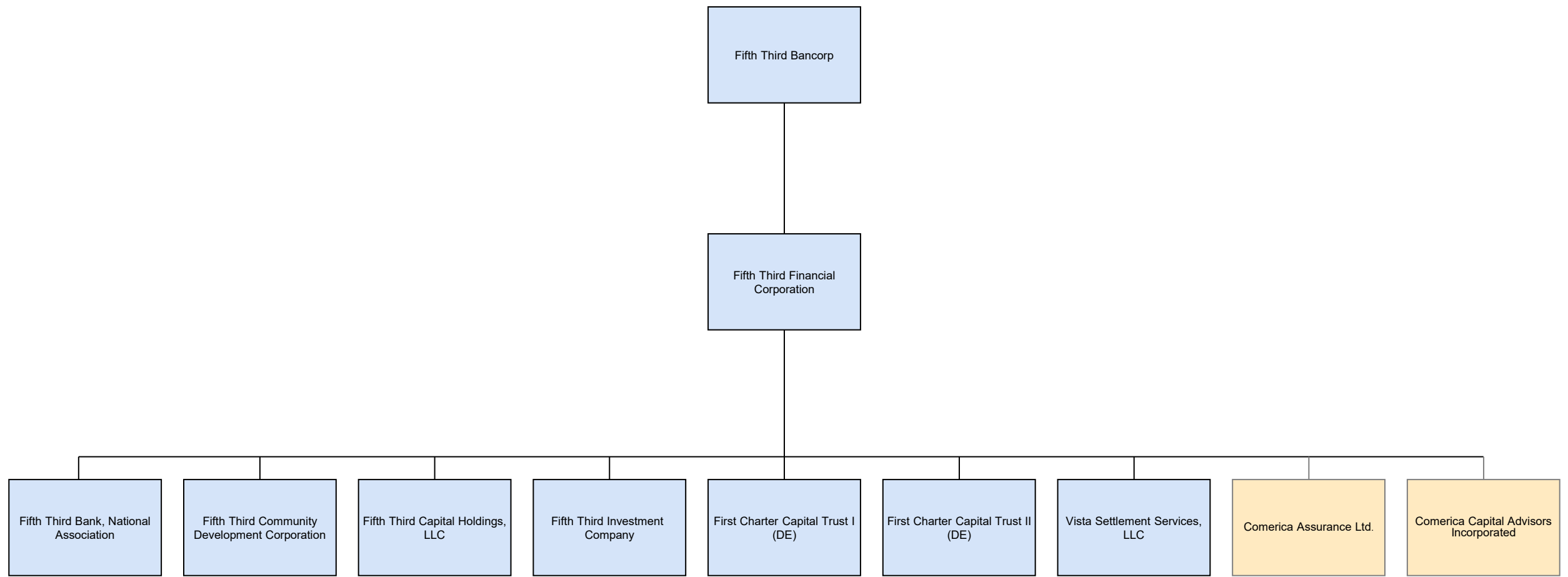
**Organizational Chart of Fifth Third, Fifth Third Financial and Fifth Third  
Bank (Current and Pro Forma)**

Simplified Organizational Chart of Fifth Third (Current)





Simplified Organizational Chart of Fifth Third (Pro Forma)



**COLOR KEY:**

|                                          |
|------------------------------------------|
| Fifth Third Bancorp and Its Subsidiaries |
| Legacy Comerica Subsidiaries             |

**Public Exhibit 2**

**Agreement and Plan of Merger, dated as of October 5, 2025, by and between  
Fifth Third, Fifth Third Financial Corporation, Comerica and Comerica  
Holdings**

**AGREEMENT AND PLAN OF MERGER**

**by and among**

**FIFTH THIRD BANCORP,**

**FIFTH THIRD FINANCIAL CORPORATION,**

**COMERICA INCORPORATED**

**and**

**COMERICA HOLDINGS INCORPORATED**

---

**Dated as of October 5, 2025**

## TABLE OF CONTENTS

|                                                                   |           |
|-------------------------------------------------------------------|-----------|
| <b>ARTICLE I THE MERGERS .....</b>                                | <b>1</b>  |
| 1.1. Merger.....                                                  | 1         |
| 1.2. Time and Place of Closing.....                               | 2         |
| 1.3. Effective Time .....                                         | 2         |
| 1.4. Conversion of Common Stock.....                              | 2         |
| 1.5. Conversion of Preferred Stock.....                           | 3         |
| 1.6. Fifth Third Common Stock.....                                | 3         |
| 1.7. Fifth Third Intermediary Common Stock .....                  | 3         |
| 1.8. Treatment of Comerica Equity Awards .....                    | 4         |
| 1.9. Articles of Incorporation of Surviving Corporation .....     | 6         |
| 1.10. Code of Regulations of Surviving Corporation .....          | 6         |
| 1.11. Second Step Merger.....                                     | 6         |
| <b>ARTICLE II BANK MERGER .....</b>                               | <b>7</b>  |
| 2.1. Bank Merger .....                                            | 7         |
| <b>ARTICLE III EXCHANGE OF SHARES .....</b>                       | <b>8</b>  |
| 3.1. Fifth Third to Make Consideration Available.....             | 8         |
| 3.2. Exchange of Shares.....                                      | 8         |
| <b>ARTICLE IV REPRESENTATIONS AND WARRANTIES OF COMERICA.....</b> | <b>11</b> |
| 4.1. Corporate Organization.....                                  | 11        |
| 4.2. Capitalization .....                                         | 13        |
| 4.3. Authority; No Violation.....                                 | 14        |
| 4.4. Consents and Approvals .....                                 | 16        |
| 4.5. Reports .....                                                | 16        |
| 4.6. Financial Statements .....                                   | 17        |
| 4.7. Broker's Fees .....                                          | 18        |
| 4.8. Absence of Certain Changes or Events.....                    | 19        |
| 4.9. Legal and Regulatory Proceedings .....                       | 19        |
| 4.10. Taxes and Tax Returns.....                                  | 19        |
| 4.11. Employees.....                                              | 20        |
| 4.12. SEC Reports.....                                            | 23        |
| 4.13. Compliance with Applicable Law .....                        | 24        |
| 4.14. Certain Contracts .....                                     | 26        |
| 4.15. Agreements with Regulatory Agencies .....                   | 28        |
| 4.16. Environmental Matters.....                                  | 28        |
| 4.17. Investment Securities and Commodities.....                  | 29        |
| 4.18. Real Property .....                                         | 29        |
| 4.19. Intellectual Property.....                                  | 29        |
| 4.20. Related Party Transactions .....                            | 31        |
| 4.21. State Takeover Laws.....                                    | 31        |

|       |                                              |    |
|-------|----------------------------------------------|----|
| 4.22. | Reorganization .....                         | 31 |
| 4.23. | Opinion .....                                | 31 |
| 4.24. | Comerica Information .....                   | 31 |
| 4.25. | Loan Portfolio .....                         | 32 |
| 4.26. | Insurance .....                              | 33 |
| 4.27. | Insurance Subsidiary .....                   | 33 |
| 4.28. | Broker-Dealer Subsidiary .....               | 34 |
| 4.29. | No Other Representations or Warranties ..... | 34 |

## **ARTICLE V REPRESENTATIONS AND WARRANTIES OF FIFTH THIRD .....35**

|       |                                              |    |
|-------|----------------------------------------------|----|
| 5.1.  | Corporate Organization.....                  | 35 |
| 5.2.  | Capitalization .....                         | 36 |
| 5.3.  | Authority; No Violation.....                 | 38 |
| 5.4.  | Consents and Approvals .....                 | 39 |
| 5.5.  | Reports .....                                | 39 |
| 5.6.  | Financial Statements .....                   | 40 |
| 5.7.  | Broker's Fees .....                          | 41 |
| 5.8.  | Absence of Certain Changes or Events.....    | 42 |
| 5.9.  | Legal and Regulatory Proceedings .....       | 42 |
| 5.10. | Taxes and Tax Returns.....                   | 42 |
| 5.11. | Employees.....                               | 42 |
| 5.12. | SEC Reports.....                             | 44 |
| 5.13. | Compliance with Applicable Law .....         | 45 |
| 5.14. | Certain Contracts .....                      | 47 |
| 5.15. | Agreements with Regulatory Agencies .....    | 47 |
| 5.16. | Investment Securities and Commodities.....   | 48 |
| 5.17. | Related Party Transactions .....             | 48 |
| 5.18. | State Takeover Laws.....                     | 48 |
| 5.19. | Reorganization .....                         | 48 |
| 5.20. | Opinion .....                                | 49 |
| 5.21. | Fifth Third Information.....                 | 49 |
| 5.22. | Insurance .....                              | 49 |
| 5.23. | No Other Representations or Warranties ..... | 49 |

## **ARTICLE VI COVENANTS RELATING TO CONDUCT OF BUSINESS .....50**

|      |                                                         |    |
|------|---------------------------------------------------------|----|
| 6.1. | Conduct of Businesses Prior to the Effective Time ..... | 50 |
| 6.2. | Comerica Forbearances.....                              | 50 |
| 6.3. | Fifth Third Forbearances.....                           | 53 |

## **ARTICLE VII ADDITIONAL AGREEMENTS.....54**

|      |                                                                       |    |
|------|-----------------------------------------------------------------------|----|
| 7.1. | S-4; Joint Proxy Statement; Regulatory Applications and Filings ..... | 54 |
| 7.2. | Access to Information; Confidentiality.....                           | 56 |
| 7.3. | Shareholders' Approvals.....                                          | 57 |
| 7.4. | Legal Conditions to Merger .....                                      | 59 |

|                                                   |                                                                             |           |
|---------------------------------------------------|-----------------------------------------------------------------------------|-----------|
| 7.5.                                              | Employee Matters .....                                                      | 59        |
| 7.6.                                              | Certain Tax Matters .....                                                   | 61        |
| 7.7.                                              | Indemnification; Directors' and Officers' Insurance .....                   | 62        |
| 7.8.                                              | Additional Agreements .....                                                 | 63        |
| 7.9.                                              | Advice of Changes .....                                                     | 63        |
| 7.10.                                             | Dividends .....                                                             | 63        |
| 7.11.                                             | Shareholder Litigation .....                                                | 63        |
| 7.12.                                             | Corporate Governance .....                                                  | 64        |
| 7.13.                                             | Acquisition Proposals .....                                                 | 64        |
| 7.14.                                             | Public Announcements .....                                                  | 65        |
| 7.15.                                             | Change of Method.....                                                       | 65        |
| 7.16.                                             | Restructuring Efforts.....                                                  | 66        |
| 7.17.                                             | Takeover Statutes.....                                                      | 66        |
| 7.18.                                             | Assumption of Comerica Indebtedness .....                                   | 66        |
| 7.19.                                             | Exemption from Liability Under Section 16(b).....                           | 67        |
| 7.20.                                             | Stock Exchange Listing .....                                                | 67        |
| <b>ARTICLE VIII CONDITIONS PRECEDENT .....</b>    |                                                                             | <b>67</b> |
| 8.1.                                              | Conditions to Each Party's Obligation to Effect the Merger .....            | 67        |
| 8.2.                                              | Conditions to Obligations of Fifth Third and Fifth Third Intermediary ..... | 68        |
| 8.3.                                              | Conditions to Obligations of Comerica .....                                 | 69        |
| <b>ARTICLE IX TERMINATION AND AMENDMENT .....</b> |                                                                             | <b>70</b> |
| 9.1.                                              | Termination.....                                                            | 70        |
| 9.2.                                              | Effect of Termination.....                                                  | 71        |
| <b>ARTICLE X GENERAL PROVISIONS .....</b>         |                                                                             | <b>73</b> |
| 10.1.                                             | Amendment.....                                                              | 73        |
| 10.2.                                             | Extension; Waiver.....                                                      | 73        |
| 10.3.                                             | Nonsurvival of Representations, Warranties and Agreements .....             | 74        |
| 10.4.                                             | Expenses .....                                                              | 74        |
| 10.5.                                             | Notices .....                                                               | 74        |
| 10.6.                                             | Interpretation.....                                                         | 75        |
| 10.7.                                             | Counterparts.....                                                           | 76        |
| 10.8.                                             | Entire Agreement.....                                                       | 76        |
| 10.9.                                             | Governing Law; Jurisdiction.....                                            | 76        |
| 10.10.                                            | Waiver of Jury Trial.....                                                   | 76        |
| 10.11.                                            | Assignment; Third-Party Beneficiaries.....                                  | 77        |
| 10.12.                                            | Specific Performance .....                                                  | 77        |
| 10.13.                                            | Severability .....                                                          | 77        |
| 10.14.                                            | Confidential Supervisory Information .....                                  | 77        |
| 10.15.                                            | Delivery by Facsimile or Electronic Transmission.....                       | 78        |

## **EXHIBITS**

Exhibit A      Bank Merger Agreement

## INDEX OF DEFINED TERMS

|                                         | <u>Page</u> |
|-----------------------------------------|-------------|
| Acquisition Proposal .....              | 65          |
| affiliate .....                         | 75          |
| Agreement.....                          | 1           |
| Assumed Awards .....                    | 5           |
| Assumed DSU Award.....                  | 5           |
| Assumed Option.....                     | 4           |
| Assumed RSU Award .....                 | 4           |
| Bank Merger .....                       | 7           |
| Bank Merger Act.....                    | 13          |
| Bank Merger Agreement.....              | 7           |
| Bank Merger Certificates.....           | 8           |
| BHC Act.....                            | 11          |
| Chosen Courts.....                      | 76          |
| Closing .....                           | 2           |
| Closing Date.....                       | 2           |
| Code .....                              | 1           |
| Comerica .....                          | 1           |
| Comerica 2018 LTIP.....                 | 4           |
| Comerica Agent .....                    | 33          |
| Comerica Bank.....                      | 7           |
| Comerica Bank & Trust.....              | 7           |
| Comerica Benefit Plans.....             | 20          |
| Comerica Board Recommendation .....     | 57          |
| Comerica Broker-Dealer Subsidiary ..... | 34          |
| Comerica Bylaws.....                    | 12          |
| Comerica Charter .....                  | 12          |
| Comerica Common Stock .....             | 2           |
| Comerica Contract .....                 | 27          |
| Comerica Disclosure Schedule .....      | 11          |
| Comerica DSU Award .....                | 5           |
| Comerica Equity Awards.....             | 6           |
| Comerica ERISA Affiliate.....           | 20          |
| Comerica ESPP.....                      | 6           |
| Comerica Holdings .....                 | 1           |
| Comerica Holdings Bylaws .....          | 12          |
| Comerica Holdings Charter .....         | 12          |
| Comerica Insider.....                   | 23          |
| Comerica Insurance Subsidiary .....     | 33          |
| Comerica Meeting.....                   | 57          |
| Comerica Option.....                    | 4           |
| Comerica Owned Properties .....         | 29          |
| Comerica Preferred Stock.....           | 3           |
| Comerica PSU Award.....                 | 5           |



|                                                    |    |
|----------------------------------------------------|----|
| Comerica Qualified Plans .....                     | 21 |
| Comerica Real Property .....                       | 29 |
| Comerica Regulatory Agreement .....                | 28 |
| Comerica Reports.....                              | 23 |
| Comerica RSU Award .....                           | 4  |
| Comerica Securities .....                          | 14 |
| Comerica Subsidiary .....                          | 12 |
| Comerica Tax Opinion.....                          | 70 |
| Confidentiality Agreement.....                     | 57 |
| Continuing Employees.....                          | 59 |
| Delaware Secretary .....                           | 2  |
| DGCL.....                                          | 1  |
| Effective Time .....                               | 2  |
| Enforceability Exceptions .....                    | 15 |
| Environmental Laws .....                           | 29 |
| ERISA .....                                        | 20 |
| Exchange Act.....                                  | 18 |
| Exchange Agent .....                               | 8  |
| Exchange Fund.....                                 | 8  |
| Exchange Ratio .....                               | 2  |
| FDIC .....                                         | 13 |
| Federal Reserve Board.....                         | 16 |
| Fifth Third .....                                  | 1  |
| Fifth Third Articles .....                         | 35 |
| Fifth Third Bank .....                             | 7  |
| Fifth Third Benefit Plans .....                    | 42 |
| Fifth Third Board Recommendation .....             | 57 |
| Fifth Third Closing Price .....                    | 10 |
| Fifth Third Code of Regulations .....              | 35 |
| Fifth Third Common Stock .....                     | 2  |
| Fifth Third Contract .....                         | 47 |
| Fifth Third Disclosure Schedule .....              | 35 |
| Fifth Third ERISA Affiliate.....                   | 43 |
| Fifth Third Intermediary .....                     | 1  |
| Fifth Third Intermediary Articles.....             | 6  |
| Fifth Third Intermediary Code of Regulations ..... | 6  |
| Fifth Third Meeting.....                           | 57 |
| Fifth Third Preferred Stock.....                   | 36 |
| Fifth Third Qualified Plans .....                  | 43 |
| Fifth Third Regulatory Agreement .....             | 48 |
| Fifth Third Reports .....                          | 45 |
| Fifth Third Series A, Class B Preferred Stock..... | 36 |
| Fifth Third Subsidiary.....                        | 36 |
| Fifth Third Tax Opinion.....                       | 69 |
| FINRA.....                                         | 16 |
| First Step Certificates of Merger.....             | 2  |

|                                                  |    |
|--------------------------------------------------|----|
| GAAP .....                                       | 12 |
| Governmental Entity .....                        | 16 |
| Indemnified Party .....                          | 62 |
| Intellectual Property .....                      | 30 |
| IRS .....                                        | 21 |
| IT Assets .....                                  | 25 |
| Joint Proxy Statement .....                      | 16 |
| knowledge .....                                  | 75 |
| Liens .....                                      | 14 |
| Loans .....                                      | 31 |
| made available .....                             | 75 |
| Malicious Code .....                             | 25 |
| Material Adverse Effect .....                    | 11 |
| Materially Burdensome Regulatory Condition ..... | 55 |
| Merger .....                                     | 1  |
| Merger Consideration .....                       | 2  |
| Mergers .....                                    | 6  |
| Multiemployer Plan .....                         | 21 |
| Multiple Employer Plan .....                     | 21 |
| NASDAQ .....                                     | 10 |
| New Certificates .....                           | 8  |
| New Fifth Third Preferred Stock .....            | 3  |
| NYSE .....                                       | 16 |
| OCC .....                                        | 16 |
| OGCL .....                                       | 1  |
| Ohio Secretary .....                             | 2  |
| Old Certificate .....                            | 2  |
| Organizational Documents .....                   | 13 |
| parties .....                                    | 1  |
| party .....                                      | 1  |
| PBGC .....                                       | 21 |
| Permitted Encumbrances .....                     | 29 |
| person .....                                     | 75 |
| Personal Data .....                              | 24 |
| Premium Cap .....                                | 62 |
| Recommendation Change .....                      | 58 |
| Regulatory Agencies .....                        | 16 |
| Representatives .....                            | 64 |
| Requisite Comerica Vote .....                    | 15 |
| Requisite Fifth Third Vote .....                 | 38 |
| Requisite Regulatory Approvals .....             | 68 |
| S-4 .....                                        | 16 |
| Sarbanes-Oxley Act .....                         | 18 |
| SEC .....                                        | 16 |
| Second Step Certificates of Merger .....         | 7  |
| Second Step Effective Time .....                 | 7  |

|                                |    |
|--------------------------------|----|
| Second Step Merger .....       | 6  |
| Securities Act .....           | 23 |
| Security Breach .....          | 25 |
| Significant Subsidiaries ..... | 52 |
| Software .....                 | 30 |
| Specified Date .....           | 71 |
| SRO .....                      | 16 |
| Stock Issuance .....           | 38 |
| Subsidiary .....               | 12 |
| Surviving Corporation .....    | 1  |
| Surviving Entity .....         | 1  |
| Takeover Statutes .....        | 31 |
| Tax .....                      | 20 |
| Tax Return .....               | 20 |
| Taxes .....                    | 20 |
| Termination Date .....         | 70 |
| Termination Fee .....          | 72 |
| Trade Secrets .....            | 30 |

## AGREEMENT AND PLAN OF MERGER

AGREEMENT AND PLAN OF MERGER, dated as of October 5, 2025 (this “Agreement”), by and among Fifth Third Bancorp, an Ohio corporation (“Fifth Third”), Fifth Third Financial Corporation, an Ohio corporation and a wholly owned subsidiary of Fifth Third (“Fifth Third Intermediary”), Comerica Incorporated, a Delaware corporation (“Comerica”) and Comerica Holdings Incorporated, a Delaware corporation and a wholly owned subsidiary of Comerica (“Comerica Holdings”) (each of Fifth Third, Fifth Third Intermediary, Comerica and Comerica Holdings, a “party”, or collectively, the “parties”).

### RECITALS

- A. Approvals. The Boards of Directors of Fifth Third, Fifth Third Intermediary, Comerica and Comerica Holdings have determined that the transactions described herein are consistent with, and will further, their respective business strategies and goals, and are in the best interests of Fifth Third, Fifth Third Intermediary, Comerica and Comerica Holdings, respectively, and their respective shareholders or stockholders, as applicable.
- B. The Mergers. This Agreement provides for a strategic business combination through (i) the merger of Comerica with and into Fifth Third Intermediary, with Fifth Third Intermediary as the surviving corporation (hereinafter sometimes referred to in such capacity as the “Surviving Corporation”) and (ii) immediately thereafter, the merger of Comerica Holdings with and into the Surviving Corporation, with the Surviving Corporation as the surviving corporation (hereinafter sometimes referred to in such capacity as the “Surviving Entity”).
- C. Intention of the Parties. It is the intention of the parties that (i) each of the Merger and the Bank Mergers shall qualify as a “reorganization” within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the “Code”), (ii) this Agreement shall constitute a “plan of reorganization” for purposes of Sections 354 and 361 of the Code, and (iii) the Second Step Merger shall qualify as a “liquidation” as described in Section 332 of the Code.

NOW, THEREFORE, in consideration of the above and the mutual warranties, representations, covenants, and agreements set forth herein, and intending to be legally bound hereby, the parties agree as follows:

### ARTICLE I THE MERGERS

1.1. Merger. Subject to the terms and conditions of this Agreement, at the Effective Time, Comerica shall be merged with and into Fifth Third Intermediary (the “Merger”) in accordance with the provisions of the Delaware General Corporation Law, as amended (the “DGCL”), and the Ohio General Corporation Law, as amended (the “OGCL”). Fifth Third Intermediary shall be the surviving corporation in the Merger and shall continue its corporate existence under the laws of the State of Ohio. Upon consummation of the Merger, the separate corporate existence of Comerica will cease. At and after the Effective Time, the Merger shall have the effects set forth in the applicable provisions of the DGCL and OGCL.

1.2. Time and Place of Closing The closing of the Merger (the “Closing”) shall take place by electronic exchange of documents and signatures on (i) the first (1st) business day of the month following the date on which each of the conditions set forth in Article VIII (other than those conditions that by their nature are to be satisfied at the Closing but subject to the fulfillment or waiver of those conditions) have been satisfied or waived in accordance with this Agreement; provided, if the Termination Date would occur (x) on or following the third business day following the date on which each of the conditions set forth in Article VIII (other than those conditions that by their nature are to be satisfied at the Closing but subject to the fulfillment or waiver of those conditions) have been satisfied or waived in accordance with this Agreement, but (y) prior to the date that the Closing would otherwise be scheduled to occur pursuant to clause (i), then the Closing shall instead occur on the third (3rd) business day following the date on which each of the conditions set forth in Article VIII (other than those conditions that by their nature are to be satisfied at the Closing but subject to the fulfillment or waiver of those conditions) have been satisfied or waived in accordance with this Agreement; provided, further that if the date on which such conditions are satisfied or waived is less than five (5) business days prior to the first business day of such following month, the Closing shall occur on the first business day of the next succeeding calendar month so long as the Termination Date is not before the first business day of such next succeeding calendar month or (ii) at such other time and place as the parties hereto may mutually agree (the date of the Closing, the “Closing Date”). The Closing shall be deemed effective as of the Effective Time.

1.3. Effective Time. Subject to the terms and conditions of this Agreement, on or before the Closing Date, the parties will cause a certificate of merger with respect to the Merger to be filed with the Secretary of State of the State of Delaware (the “Delaware Secretary”) and a certificate of merger to be filed with the Secretary of State of the State of Ohio (the “Ohio Secretary”) (collectively, the “First Step Certificates of Merger”) to effect the Merger. The Merger shall take place at the time specified in the First Step Certificates of Merger (the “Effective Time”).

1.4. Conversion of Common Stock. At the Effective Time, by virtue of the Merger and without any action on the part of Fifth Third, Fifth Third Intermediary, Comerica, Comerica Holdings or the holder of any of the following securities:

(a) Each share of common stock, \$5.00 par value, of Comerica (the “Comerica Common Stock”) issued and outstanding immediately prior to the Effective Time (except for shares of Comerica Common Stock owned by Comerica or Fifth Third (in each case other than shares of Comerica Common Stock (i) held in trust accounts, managed accounts, mutual funds and the like, or otherwise held in a fiduciary or agency capacity that are beneficially owned by third parties or (ii) held, directly or indirectly, by Comerica or Fifth Third in respect of debts previously contracted)) shall be converted into the right to receive 1.8663 shares (the “Exchange Ratio” and such shares the “Merger Consideration”) of common stock, without par value, of Fifth Third (“Fifth Third Common Stock”).

(b) All shares of Comerica Common Stock converted pursuant to this Section 1.4 shall no longer be issued and outstanding and shall automatically be cancelled and retired and shall cease to exist as of the Effective Time, and each certificate previously representing any such shares of Comerica Common Stock (each, an “Old Certificate”; it being

understood that any reference herein to an Old Certificate shall be deemed to include reference to book-entry account statements relating to the ownership of shares of Comerica Common Stock) shall thereafter represent only the right to receive (i) a New Certificate representing the number of whole shares of Fifth Third Common Stock which such shares of Comerica Common Stock have been converted into the right to receive pursuant to this Section 1.4, (ii) cash in lieu of fractional shares which the shares of Comerica Common Stock represented by such Old Comerica Certificate have been converted into the right to receive pursuant to this Section 1.4 and Section 3.2(e), without any interest thereon and (iii) any dividends or distributions which the holder thereof has the right to receive pursuant to Section 3.2, in each case, without any interest thereon. If, prior to the Effective Time, the issued and outstanding shares of Fifth Third Common Stock or Comerica Common Stock shall have been increased, decreased, changed into or exchanged for a different number or kind of shares or securities as a result of a reorganization, recapitalization, reclassification, stock dividend, stock split or reverse stock split, or there shall be any extraordinary dividend or distribution, an appropriate and proportionate adjustment shall be made to the Exchange Ratio to give the holders of Comerica Common Stock the same economic effect as contemplated by this Agreement prior to such event; provided that nothing contained in this sentence shall be construed to permit Comerica or Fifth Third to take any action with respect to its securities or otherwise that is prohibited by the terms of this Agreement.

(c) Notwithstanding anything in this Agreement to the contrary, at the Effective Time, all shares of Comerica Common Stock that are owned by Comerica or Fifth Third (in each case other than shares of Comerica Common Stock or Fifth Third Common Stock (i) held in trust accounts, managed accounts, mutual funds and the like, or otherwise held in a fiduciary or agency capacity that are beneficially owned by third parties or (ii) held, directly or indirectly, by Comerica or Fifth Third, as applicable, in respect of debts previously contracted) shall be cancelled and retired and shall cease to exist and no Fifth Third Common Stock or other consideration shall be delivered in exchange therefor.

1.5. Conversion of Preferred Stock. At the Effective Time, by virtue of the Merger and without any action on the part of Fifth Third, Comerica or the holder of any securities of Fifth Third or Comerica, each share of 6.875% Fixed-Rate Reset Non-Cumulative Perpetual Preferred Stock, Series B, no par value, of Comerica (the “Comerica Preferred Stock”), issued and outstanding immediately prior to the Effective Time shall automatically be converted into the right to receive a share of a newly created series of preferred stock of Fifth Third having terms that are not materially less favorable than the terms of the Comerica Preferred Stock (all shares of such newly created series, collectively, the “New Fifth Third Preferred Stock”) and, upon such conversion, the Comerica Preferred Stock shall no longer be issued and outstanding and shall automatically be cancelled and shall cease to exist as of the Effective Time.

1.6. Fifth Third Common Stock. At and after the Effective Time, each share of Fifth Third Common Stock issued and outstanding immediately prior to the Effective Time shall remain an issued and outstanding share of common stock of Fifth Third and shall not be affected by the Merger.

1.7. Fifth Third Intermediary Common Stock. At and after the Effective Time, each share of Fifth Third Intermediary common stock issued and outstanding immediately prior

to the Effective Time shall remain an issued and outstanding share of common stock of the Surviving Corporation and shall not be affected by the Merger.

1.8. Treatment of Comerica Equity Awards.

(a) Treatment of Comerica Stock Options. At the Effective Time, each option granted by Comerica to purchase shares of Comerica Common Stock that is outstanding and unexercised immediately prior to the Effective Time whether or not vested (a “Comerica Option”) shall, automatically and without any action on the part of the holder thereof, be converted into an option to purchase shares of Fifth Third Common Stock (an “Assumed Option”) adjusted as follows: (i) the number of shares of Fifth Third Common Stock subject to the Assumed Option shall equal the (A) the number of shares of Comerica Common Stock subject to the Comerica Option immediately prior to the Effective Time *multiplied* by (B) the Exchange Ratio, with any fractional shares rounded down to the nearest whole share, and (ii) the exercise price per share of Fifth Third Common Stock subject to the Adjusted Option shall equal (A) the per share exercise price applicable to the corresponding Comerica Option immediately prior to the Effective Time *divided* by (B) the Exchange Ratio, rounded up to the nearest whole cent. Each Adjusted Option shall otherwise be subject to the same terms and conditions as applied to the corresponding Comerica Option under the applicable Comerica equity plan and the award agreement evidencing grant thereunder, including vesting terms and termination protections under the applicable equity plan, including the provisions of Section 10(d) of the Comerica Amended and Restated 2018 Long-Term Incentive Plan (as amended) (the “Comerica 2018 LTIP”), or any more favorable termination protections under the applicable award agreement.

(b) Treatment of Comerica RSU Awards. At the Effective Time, each outstanding award of restricted stock units (a “Comerica RSU Award”) that is not a Director RSU Award (as defined below), whether granted prior to or on or after the date hereof shall, whether vested or unvested, automatically and without any required action on the part of the holder thereof, be converted into a restricted share unit award in respect of shares of Fifth Third Common Stock (an “Assumed RSU Award”) on the terms and conditions, including any vesting requirements and termination protections, under the applicable equity plan and award agreement in effect immediately prior to the Effective Time (including, as applicable, the provisions of Section 10(d) of the Comerica 2018 LTIP, or any more favorable termination protections under the applicable award agreement), with respect to a number of shares of Fifth Third Common Stock (rounded up to the nearest whole number of shares) equal to the product of (A) the number of shares of Comerica Common Stock subject to such Comerica RSU Award immediately prior to the Effective Time *multiplied* by (B) the Exchange Ratio. For the avoidance of doubt, any amounts relating to dividend equivalent payments with respect to any Comerica RSU Award that are accrued but unpaid as of the Effective Time will carry over with respect to the Assumed RSU Award and will be paid in accordance with the terms and conditions as were applicable to such Comerica RSU Award immediately prior to the Effective Time.

(c) Treatment of Director RSU Awards. At the Effective Time, each outstanding Comerica RSU Award that is held by a current or former non-employee director (a “Director RSU Award”), whether granted prior to or on or after the date hereof shall, whether vested or unvested, be converted into the right to receive (without interest) (A) a number of fully



vested and freely transferable shares of Fifth Third Common Stock (rounded up to the nearest whole number of shares) equal to the product of (A) the number of shares of Comerica Common Stock subject to such Director RSU Award immediately prior to the Effective Time *multiplied* by (B) the Exchange Ratio, plus (B) a cash payment in respect of any accrued but unpaid dividend equivalents in respect of such Director RSU Award (to the extent not re-invested), with such consideration to be issued or paid, as applicable, as soon as reasonably practicable following the Closing Date and in no event later than five (5) business days following the Closing Date.

(d) Treatment of Comerica PSU Awards. At the Effective Time, each outstanding award of performance stock units (a “Comerica PSU Award”), whether vested or unvested, shall, automatically and without any required action on the part of the holder thereof, be converted into an Assumed RSU Award on the terms and conditions, including any time-based vesting requirements (but excluding any performance-based vesting requirements) and termination protections under the applicable equity plan and award agreement in effect immediately prior to the Effective Time (including, as applicable, the provisions of Section 10(d) of the Comerica 2018 LTIP, or any more favorable termination protections under the applicable award agreement), with respect to a number of shares of Fifth Third Common Stock (rounded up to the nearest whole number of shares) equal to the product of a number of shares of Fifth Third Common Stock (rounded up to the nearest whole number of shares) equal to the product of (A) the number of shares of Comerica Common Stock subject to such Comerica PSU Award (with such number of shares of Comerica Common Stock determined based on the greater of (x) the target level of performance and (y) the actual level of performance measured through the latest practicable date prior to the Effective Time as determined by the Governance, Compensation and Nominating Committee of the Comerica Board of Directors prior to the Effective Time in good faith) immediately prior to the Effective Time *multiplied* by (B) the Exchange Ratio. For the avoidance of doubt, any amounts relating to dividend equivalent payments with respect to any Comerica PSU Award that are accrued but unpaid as of the Effective Time will carry over with respect to the Assumed RSU Award and will be paid in accordance with the terms and conditions as were applicable to such Comerica PSU Award immediately prior to the Effective Time.

(e) Treatment of Comerica DSU Awards. Each outstanding award of deferred stock units in respect of shares Comerica Common Shares deferred or issuable under the Amended and Restated Comerica Incorporated Common Stock Non-Employee Director Fee Deferral Plan or 1999 Comerica Incorporated Amended and Restated Common Stock Deferred Incentive Award Plan (each, a “Comerica DSU Award”) that is outstanding immediately prior to the Effective Time shall, as of the Effective Time, automatically and without any action on the part of the holder thereof, fully vest and any restrictions thereon shall lapse and be converted into a Fifth Third deferred share unit award (an “Assumed DSU Award”, together with the Assumed Options, Assumed RSU Awards, the “Assumed Awards”) on the terms and conditions under the applicable plan, award agreement and deferral election in effect immediately prior to the Effective Time, with respect to a number of shares of Fifth Third Common Stock (rounded up to the nearest whole number of shares) equal to the product of (i) the number of shares Comerica Common Stock subject to such Comerica DSU Award immediately prior to the Effective Time *multiplied* by (ii) the Exchange Ratio.

(f) Fifth Third Actions. Upon the Effective Time, Fifth Third shall file a post-effective amendment to the S-4 or an effective registration statement on Form S-8 with



respect to the Assumed Awards. Notwithstanding anything to the contrary in this Section 1.6, with respect to a Comerica Equity Award (as defined below) that constitutes “deferred compensation” for purposes of Section 409A of the Code, the shares of Fifth Third Common Stock and/or payments in respect thereof shall be settled or paid in a manner that will not result in the application of additional Taxes or penalties under Section 409A of the Code.

(g) Comerica Actions. At or prior to the Effective Time, the Comerica Board of Directors or the appropriate committee thereof shall adopt any resolutions that are necessary to effectuate the treatment of the Comerica Options, the Comerica RSU Awards, the Comerica PSU Awards and the Comerica DSU Awards (collectively, the “Comerica Equity Awards”) as contemplated by this Section 1.6.

(h) Treatment of Comerica ESPP. The Comerica Employee Stock Purchase Plan (the “Comerica ESPP”) shall terminate, effective as of no later than the fifth trading day before the Effective Time, but subsequent to the exercise of purchase rights on such purchase date (in accordance with the terms of the Comerica ESPP); provided, that, if requested by Fifth Third in writing at least ten (10) business days prior to the first day of the enrollment period for the offering period immediately following the offering period in progress as of the date hereof (the “Current Offering Period”), Comerica shall take all actions that are reasonably necessary to ensure that no additional offering period shall commence following the conclusion of the Current Offering Period.

1.9. Articles of Incorporation of Surviving Corporation. At the Effective Time, the Articles of Incorporation of Fifth Third Intermediary (the “Fifth Third Intermediary Articles”), as in effect immediately prior to the Effective Time, shall be the Articles of Incorporation of the Surviving Corporation until thereafter amended in accordance with applicable law.

1.10. Code of Regulations of Surviving Corporation. At the Effective Time, the Code of Regulations of Fifth Third Intermediary (the “Fifth Third Intermediary Code of Regulations”), as in effect immediately prior to the Effective Time, shall be the Code of Regulations of the Surviving Corporation until thereafter amended in accordance with applicable law.

1.11. Second Step Merger.

(a) Subject to the terms and conditions of this Agreement, immediately following the Effective Time, at the Second Step Effective Time, Comerica Holdings shall be merged with and into the Surviving Corporation (the “Second Step Merger,” and together with the Merger, the “Mergers”) in accordance with the OGCL and the DGCL. The Surviving Corporation shall be the surviving corporation in the Second Step Merger and shall continue its corporate existence under the laws of the State of Ohio. Upon consummation of the Second Step Merger, the separate corporate existence of Comerica Holdings will cease. At and after the Second Step Effective Time, the Second Step Merger shall have the effects set forth in the applicable provisions of the DGCL and OGCL.

(b) Subject to the terms and conditions of this Agreement, on or before the Closing Date, the parties will cause a certificate of merger with respect to the Second Step Merger to be filed with the Delaware Secretary and a certificate of merger to be filed with the Ohio Secretary (collectively, the “Second Step Certificates of Merger”) to effect the Second Step Merger. The Second Step Merger shall take place at the time specified in the Second Step Certificates of Merger (the “Second Step Effective Time”).

(c) At the Second Step Effective Time, by virtue of the Second Step Merger and without any action on the part of Fifth Third, Fifth Third Intermediary, Comerica, Comerica Holdings or the holder of any securities of Fifth Third, Fifth Third Intermediary, Comerica or Comerica Holdings, each share of common stock, par value \$0.01 per share, of Comerica Holdings that is issued and outstanding immediately prior to the Second Step Effective Time, shall automatically be cancelled and retired for no consideration and shall cease to exist.

(d) The shares of Fifth Third Intermediary stock issued and outstanding immediately prior to the Second Step Effective Time shall not be affected by the Second Step Merger, and, accordingly, each share of Fifth Third Intermediary stock issued and outstanding immediately prior to the Second Step Effective Time shall, at and after the Second Step Effective Time, remain issued and outstanding; it being understood that upon the Second Step Effective Time, the common stock of the Surviving Corporation shall be the common stock of the Surviving Entity.

(e) At the Second Step Effective Time, the Fifth Third Intermediary Articles, as in effect immediately prior to the Second Step Effective Time, shall be the Articles of Incorporation of the Surviving Entity until thereafter amended in accordance with applicable law.

(f) At the Second Step Effective Time, the Fifth Third Intermediary Code of Regulations, as in effect immediately prior to the Second Step Effective Time, shall be the Code of Regulations of the Surviving Entity until thereafter amended in accordance with applicable law.

## **ARTICLE II**

### **BANK MERGER**

2.1. Bank Merger. Immediately following the Second Step Effective Time, at a time determined by Fifth Third, each of Comerica Bank, a Texas banking association and wholly-owned Subsidiary of Comerica (“Comerica Bank”) and Comerica Bank & Trust, National Association, a national bank and wholly-owned Subsidiary of Comerica Holdings (“Comerica Bank & Trust”), will each merge with and into Fifth Third Bank, National Association, a national bank and wholly-owned Subsidiary of Fifth Third Intermediary (“Fifth Third Bank”) (each, a “Bank Merger” and collectively, the “Bank Mergers”). Fifth Third Bank shall be the surviving entity in each of the Bank Mergers and, following the Bank Mergers, the separate corporate existence of Comerica Bank and Comerica Bank & Trust shall cease. Promptly after the date of this Agreement, Fifth Third Bank, Comerica Bank and Comerica Bank & Trust will enter into an agreement and plan of merger in substantially the form set forth in Exhibit A (the “Bank Merger Agreement”). Each of Fifth Third, Comerica and Comerica

Holdings shall approve the Bank Merger Agreement and the Bank Mergers, as applicable, as the sole shareholder of Fifth Third Bank, in the case of Fifth Third, Comerica Bank, in the case of Comerica, and Comerica Bank & Trust, in the case of Comerica Holdings, and Fifth Third and Comerica shall, and shall cause Fifth Third Bank, in the case of Fifth Third, and Comerica Bank and Comerica Bank & Trust, in the case of Comerica, to, execute certificates or articles of merger and such other documents and certificates as are necessary to make the Bank Mergers effective (“Bank Merger Certificates”) immediately following the Effective Time. The Bank Merger shall become effective at such time and date as specified in the Bank Merger Agreement in accordance with applicable law, or at such other time as shall be provided by applicable law, or as mutually agreed by Comerica and Fifth Third.

### **ARTICLE III** **EXCHANGE OF SHARES**

3.1. Fifth Third to Make Consideration Available. At or prior to the Effective Time, Fifth Third shall deposit, or shall cause to be deposited, with Equinity Group, PLC or such other bank or trust company selected by Fifth Third (the “Exchange Agent”), for exchange in accordance with this Article III for the benefit of the holders of Old Certificates (which for purposes of this Article III shall be deemed to include certificates or book-entry account statements representing shares of Comerica Preferred Stock), certificates or evidence in book-entry form, representing shares of Fifth Third Common Stock or New Fifth Third Preferred Stock to be issued pursuant to Section 1.4 and Section 1.5, respectively (collectively, referred to herein as “New Certificates”), and cash in lieu of any fractional shares to be paid pursuant to Section 3.2(e) (such cash and New Certificates, together with any dividends or distributions with respect to shares of Fifth Third Common Stock or New Fifth Third Preferred Stock payable in accordance with Section 3.2, being hereinafter referred to as the “Exchange Fund”).

3.2. Exchange of Shares.

(a) As promptly as practicable after the Effective Time, but in no event later than ten (10) days thereafter, Fifth Third shall cause the Exchange Agent to mail to each holder of record of one or more Old Certificates immediately prior to the Effective Time that have been converted at the Effective Time into the right to receive Fifth Third Common Stock and New Fifth Third Preferred Stock, as applicable, pursuant to Article I, a letter of transmittal (which shall specify that delivery shall be effected, and risk of loss and title to the Old Certificates shall pass, only upon proper delivery of the Old Certificates to the Exchange Agent) and instructions for use in effecting the surrender of the Old Certificates in exchange for New Certificates representing the number of whole shares of Fifth Third Common Stock and any cash in lieu of fractional shares or shares of New Fifth Third Preferred Stock, as applicable, which the shares of Comerica Common Stock or Comerica Preferred Stock represented by such Old Certificate or Old Certificates shall have been converted into the right to receive pursuant to this Agreement as well as any dividends or distributions to be paid pursuant to this Section 3.2. Upon proper surrender of an Old Certificate or Old Certificates for exchange and cancellation to the Exchange Agent, together with such properly completed letter of transmittal, duly executed, the holder of such Old Certificate or Old Certificates shall be entitled to receive in exchange therefor, as applicable, (i) (A) a New Certificate representing that number of whole shares of Fifth Third Common Stock to which such holder of Comerica Common Stock shall have become entitled

pursuant to the provisions of Article I and (B) a check representing the amount of (x) any cash in lieu of fractional shares which such holder has the right to receive in respect of the Old Certificate or Old Certificates surrendered pursuant to the provisions of this Article III and (y) any dividends or distributions which the holder thereof has the right to receive pursuant to this Section 3.2 or (ii) (A) a New Certificate representing that number of shares of New Fifth Third Preferred Stock to which such holder of Comerica Preferred Stock shall have become entitled pursuant to the provisions of Article I, and (B) a check representing the amount of any dividends or distributions which the holder thereof has the right to receive pursuant to this Section 3.2, and the Old Certificate or Old Certificates so surrendered shall forthwith be cancelled. No interest will be paid or accrued on any cash in lieu of fractional shares or dividends or distributions payable to holders of Old Certificates. Until surrendered as contemplated by this Section 3.2, each Old Certificate shall be deemed at any time after the Effective Time to represent only the right to receive, upon surrender, the number of whole shares of Fifth Third Common Stock or shares of New Fifth Third Preferred Stock which the shares of Comerica Common Stock or Comerica Preferred Stock, as applicable, represented by such Old Certificate have been converted into the right to receive and any cash in lieu of fractional shares or in respect of any dividends or distributions as contemplated by this Section 3.2.

(b) No dividends or other distributions declared with respect to Fifth Third Common Stock or New Fifth Third Preferred Stock shall be paid to the holder of any unsurrendered Old Certificate until the holder thereof shall surrender such Old Certificate in accordance with this Article III. After the surrender of an Old Certificate in accordance with this Article III, the record holder thereof shall be entitled to receive any such dividends or other distributions, without any interest thereon, which theretofore had become payable with respect to the shares of Fifth Third Common Stock or shares of New Fifth Third Preferred Stock that the shares of Comerica Common Stock or Comerica Preferred Stock, as applicable, represented by such Old Certificate have been converted into the right to receive.

(c) If any New Certificate representing shares of Fifth Third Common Stock or New Fifth Third Preferred Stock is to be issued in a name other than that in which the Old Certificate or Old Certificates surrendered in exchange therefor is or are registered, it shall be a condition of the issuance thereof that the Old Certificate or Old Certificates so surrendered shall be properly endorsed (or accompanied by an appropriate instrument of transfer) and otherwise in proper form for transfer, and that the person requesting such exchange shall pay to the Exchange Agent in advance any transfer or other similar Taxes required by reason of the issuance of a New Certificate representing shares of Fifth Third Common Stock or New Fifth Third Preferred Stock in any name other than that of the registered holder of the Old Certificate or Old Certificates surrendered, or required for any other reason, or shall establish to the satisfaction of the Exchange Agent that such Tax has been paid or is not payable.

(d) After the Effective Time, there shall be no transfers on the stock transfer books of Comerica of the shares of Comerica Common Stock or Comerica Preferred Stock, as applicable, that were issued and outstanding immediately prior to the Effective Time, as applicable. If, after the Effective Time, Old Certificates representing such shares are presented for transfer to the Exchange Agent, they shall be cancelled and exchanged for New Certificates representing shares of Fifth Third Common Stock or New Fifth Third Preferred Stock, as applicable, as provided in this Article III.

(e) Notwithstanding anything to the contrary contained herein, no New Certificates or scrip representing fractional shares of Fifth Third Common Stock shall be issued upon the surrender for exchange of Old Certificates, no dividend or distribution with respect to Fifth Third Common Stock shall be payable on or with respect to any fractional share, and such fractional share interests shall not entitle the owner thereof to vote or to any other rights of a shareholder of Fifth Third. In lieu of the issuance of any such fractional share, Fifth Third shall pay to each former holder of Comerica Common Stock who otherwise would be entitled to receive such fractional share an amount in cash (without interest and rounded to the nearest cent) determined by multiplying (i) the average of the closing-sale price of Fifth Third Common Stock on the Nasdaq Stock Market ("NASDAQ"), as reported by *The Wall Street Journal* for the consecutive period of five (5) full trading days ending on the trading day preceding the Closing Date (the "Fifth Third Closing Price") by (ii) the fraction of a share (after taking into account all shares of Comerica Common Stock held by such holder immediately prior to the Effective Time and rounded to the nearest one-thousandth when expressed in decimal form) of Fifth Third Common Stock which such holder would otherwise be entitled to receive pursuant to Section 1.4. The parties acknowledge that payment of such cash consideration in lieu of issuing fractional shares is not separately bargained-for consideration, but merely represents a mechanical rounding off for purposes of avoiding the expense and inconvenience that would otherwise be caused by the issuance of fractional shares.

(f) Any portion of the Exchange Fund that remains unclaimed by the stockholders of Comerica for twelve (12) months after the Effective Time shall be paid to Fifth Third. Any former holders of Comerica Common Stock or Comerica Preferred Stock, who have not theretofore complied with this Article III shall thereafter look only to the Surviving Entity for payment of the shares of Fifth Third Common Stock, cash in lieu of any fractional shares and any unpaid dividends and distributions on the Fifth Third Common Stock deliverable in respect of each former share of Comerica Common Stock such holder holds as determined pursuant to this Agreement, or the shares of New Fifth Third Preferred Stock and any unpaid dividends and distributions on the New Fifth Third Preferred Stock deliverable in respect of each former share of Comerica Preferred Stock such holder holds as determined pursuant to this Agreement, in each case, without any interest thereon. Notwithstanding the foregoing, none of Fifth Third, Comerica, the Surviving Entity, the Exchange Agent or any other person shall be liable to any former holder of shares of Comerica Common Stock or Comerica Preferred Stock for any amount delivered in good faith to a public official pursuant to applicable abandoned property, escheat or similar laws.

(g) Fifth Third shall be entitled to deduct and withhold, or cause the Exchange Agent to deduct and withhold, from any cash in lieu of fractional shares of Fifth Third Common Stock, cash dividends or distributions payable pursuant to this Section 3.2 or any other amounts otherwise payable pursuant to this Agreement such amounts as it is required to deduct and withhold with respect to the making of such payment under the Code or any provision of state, local or foreign Tax law. To the extent that amounts are so deducted and withheld and paid over to the appropriate governmental authority, such amounts shall be treated for all purposes of this Agreement as having been paid to the person in respect of which the deduction and withholding was made.



(h) In the event any Old Certificate shall have been lost, stolen or destroyed, upon the making of an affidavit of that fact by the person claiming such Old Certificate to be lost, stolen or destroyed and, if required by Fifth Third or the Exchange Agent, the posting by such person of a bond in such amount as Fifth Third or the Exchange Agent may determine is reasonably necessary as indemnity against any claim that may be made against it with respect to such Old Certificate, the Exchange Agent will issue in exchange for such lost, stolen or destroyed Old Certificate the shares, and any cash in lieu of fractional shares, of Fifth Third Common Stock, or the shares of New Fifth Third Preferred Stock, as applicable, deliverable in respect thereof pursuant to this Agreement.

#### **ARTICLE IV**

##### **REPRESENTATIONS AND WARRANTIES OF COMERICA**

Except (a) as disclosed in the disclosure schedule delivered by Comerica to Fifth Third concurrently herewith (the “Comerica Disclosure Schedule”); provided, that (i) no such item is required to be set forth as an exception to a representation or warranty if its absence would not result in the related representation or warranty being deemed untrue or incorrect, (ii) the mere inclusion of an item in the Comerica Disclosure Schedule as an exception to a representation or warranty shall not be deemed an admission by Comerica that such item represents a material exception or fact, event or circumstance or that such item would reasonably be expected to have a Material Adverse Effect and (iii) any disclosures made with respect to a section of this Article IV shall be deemed to qualify (1) any other section of this Article IV specifically referenced or cross-referenced and (2) other sections of this Article IV to the extent it is reasonably apparent on its face (notwithstanding the absence of a specific cross reference) from a reading of the disclosure that such disclosure applies to such other sections, (b) as disclosed in any Comerica Reports filed with the SEC by Comerica since December 31, 2022 and prior to the date hereof (but disregarding risk factor disclosures contained under the heading “Risk Factors,” or disclosures of risks set forth in any “forward-looking statements” disclaimer or any other statements that are similarly non-specific or cautionary, predictive or forward-looking in nature), or (c) as contemplated by Section 10.14, Comerica hereby represents and warrants to Fifth Third as follows:

#### **4.1. Corporate Organization.**

(a) Each of Comerica and Comerica Holdings is a corporation duly organized, validly existing and in good standing under the laws of the State of Delaware, is a bank holding company duly registered under the Bank Holding Company Act of 1956, as amended (the “BHC Act”) and has elected to be treated as a financial holding company under the BHC Act. Each of Comerica and Comerica Holdings has the corporate power and authority to own, lease or operate all of its properties and assets and to carry on its business as it is now being conducted in all material respects. Comerica is duly licensed or qualified to do business and in good standing in each jurisdiction in which the nature of the business conducted by it or the character or location of the properties and assets owned, leased or operated by it makes such licensing, qualification or standing necessary, except where the failure to be so licensed or qualified or to be in good standing would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica. As used in this Agreement, the term “Material Adverse Effect” means, with respect to Fifth Third, Comerica or the Surviving Entity, as the case may be,

any effect, change, event, circumstance, condition, occurrence or development that, either individually or in the aggregate, has had or would reasonably be expected to have a material adverse effect on (i) the business, properties, assets, liabilities, results of operations or financial condition of such party and its Subsidiaries taken as a whole (provided, however, that, with respect to this clause (i), Material Adverse Effect shall not be deemed to include the impact of (A) changes, after the date hereof, in U.S. generally accepted accounting principles (“GAAP”) or applicable regulatory accounting requirements, (B) changes, after the date hereof, in laws, rules or regulations of general applicability to companies in the industries in which such party and its Subsidiaries operate, or interpretations thereof by courts or Governmental Entities, (C) changes, after the date hereof, in global, national or regional political conditions (including the outbreak of war or acts of terrorism) or in economic or market (including equity, credit and debt markets, as well as changes in interest rates) conditions affecting the financial services industry generally and not specifically relating to such party or its Subsidiaries, (D) changes, after the date hereof, resulting from hurricanes, earthquakes, tornados, floods or other natural or manmade disasters or from any outbreak of any disease or other public health event, (E) public disclosure of the transactions contemplated hereby or actions expressly required by this Agreement or that are taken with the prior written consent of the other parties in contemplation of the transactions contemplated hereby, or (F) a decline in the trading price of a party’s common stock or the failure, in and of itself, to meet earnings projections or internal financial forecasts, but not, in either case, including any underlying causes thereof; except, with respect to subclause (A), (B), (C) or (D), to the extent that the effects of such change are materially disproportionately adverse to the business, properties, assets, liabilities results of operations or financial condition of such party and its Subsidiaries, taken as a whole, as compared to other companies in the industry in which such party and its Subsidiaries operate) or (ii) the ability of such party to timely consummate the transactions contemplated hereby. As used in this Agreement, the word “Subsidiary” when used with respect to any person, means any corporation, partnership, limited liability company, bank or other organization, whether incorporated or unincorporated, or person of which (x) such first person directly or indirectly owns or controls at least a majority of the securities or other interests having by their terms ordinary voting power to elect a majority of the board of directors or others performing similar functions, (y) such first person is or directly or indirectly has the power to appoint a general partner, manager or managing member or others performing similar functions or (z) such first person is deemed to control for purposes of the BHC Act. True and complete copies of the restated certificate of incorporation of Comerica (as amended, the “Comerica Charter”), the certificate of incorporation of Comerica Holdings (as amended, the “Comerica Holdings Charter”), the bylaws of Comerica (as amended, the “Comerica Bylaws”) and the bylaws of Comerica Holdings (as amended, the “Comerica Holdings Bylaws”), in each case, as in effect as of the date of this Agreement, have previously been made available by Comerica to Fifth Third.

(b) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica, each Subsidiary of Comerica (a “Comerica Subsidiary”) (i) is duly organized and validly existing under the laws of its jurisdiction of organization, (ii) is duly licensed or qualified to do business and, where such concept is recognized under applicable law, in good standing in all jurisdictions (whether federal, state, local or foreign) where its ownership, leasing or operation of property or the conduct of its business requires it to be so licensed or qualified or in good standing and (iii) has all requisite corporate power and authority to own, lease or operate its properties and assets and to carry on

its business as now conducted. There are no restrictions on the ability of Comerica or any Subsidiary of Comerica to pay dividends or distributions except, in the case of Comerica or a Subsidiary that is a regulated entity, for restrictions on dividends or distributions generally applicable to all similarly regulated entities. Comerica Bank and Comerica Bank & Trust are the only depository institution Subsidiaries of Comerica, and the deposit accounts of Comerica Bank and Comerica Bank & Trust are insured by the Federal Deposit Insurance Corporation (the “FDIC”) through the Deposit Insurance Fund (as defined in Section 3(y) of the Federal Deposit Insurance Act of 1950 (the “Bank Merger Act”)) to the fullest extent permitted by law, all premiums and assessments required to be paid in connection therewith have been paid when due, and no proceedings for the termination of such insurance are pending or threatened. Section 4.1(b) of the Comerica Disclosure Schedule sets forth a true and complete list of all Subsidiaries of Comerica as of the date hereof. True and complete copies of the articles of incorporation, certificate of incorporation, charter, bylaws or other similar governing instruments, in each case as amended (the “Organizational Documents”), of Comerica Bank and Comerica Bank & Trust as in effect as of the date of this Agreement have previously been made available by Comerica to Fifth Third. There is no person whose results of operations, cash flows, changes in shareholders’ equity or financial position are consolidated in the financial statements of Comerica other than the Comerica Subsidiaries.

#### 4.2. Capitalization.

(a) The authorized capital stock of Comerica consists of 325,000,000 shares of Comerica Common Stock, and 10,000,000 shares of preferred stock, no par value per share. As of September 30, 2025, no shares of capital stock or other equity or voting securities of Comerica are issued, reserved for issuance or outstanding, other than (i) 127,589,080 shares of Comerica Common Stock issued and outstanding, (ii) 100,575,744 shares of Comerica Common Stock held in treasury, (iii) 1,804,367 shares of Comerica Common Stock reserved for issuance upon the exercise of outstanding Comerica Stock Options, (iv) 1,974,570 shares of Comerica Common Stock reserved for issuance upon the settlement of outstanding Comerica RSU Awards, (v) 947,068 shares of Comerica Common Stock reserved for issuance upon the settlement of outstanding Comerica PSU Awards assuming that performance with respect thereto is achieved at the target level and 1,420,602 shares of Comerica Common Stock reserved for issuance upon the settlement of outstanding Comerica PSU Awards assuming that performance with respect thereto is achieved at the maximum level, (vi) 150,334 shares of Comerica Common Stock reserved for issuance upon the settlement of outstanding Comerica DSU Awards, (vii) 7,962,649 shares of Comerica Common Stock reserved for issuance for future grants under Comerica equity incentive plans (including the Comerica ESPP), and (viii) 400,000 shares of Comerica Preferred Stock (and 16,000,000 depository shares representing a 1/40<sup>th</sup> ownership interest in each such share of Comerica Preferred Stock). As of the date of this Agreement, except as set forth in the immediately preceding sentence and for changes since September 30, 2025 resulting from the grant, exercise, vesting or settlement of any Comerica Equity Awards described in the immediately preceding sentence, there are no shares of capital stock or other voting securities or equity interests of Comerica issued, reserved for issuance or outstanding. All the issued and outstanding shares of Comerica Common Stock and Comerica Preferred Stock have been duly authorized and validly issued and are fully paid, nonassessable and free of preemptive rights, with no personal liability attaching to the ownership thereof. Comerica is current on all dividends payable on the outstanding shares of Comerica Preferred Stock, and has complied in



all material respects with terms and conditions thereof. There are no bonds, debentures, notes or other indebtedness that have the right to vote on any matters on which stockholders of Comerica may vote. As of the date hereof, no trust preferred or subordinated debt securities of Comerica are issued or outstanding. Other than Comerica Equity Awards issued prior to the date of this Agreement as described in this Section 4.2(a), as of the date of this Agreement there are no outstanding subscriptions, options, warrants, stock appreciation rights, phantom units, scrip, rights to subscribe to, preemptive rights, anti-dilutive rights, rights of first refusal or similar rights, puts, calls, commitments or agreements of any character relating to, or securities or rights convertible or exchangeable into or exercisable for, shares of capital stock or other voting or equity securities of or ownership interest in Comerica, or contracts, commitments, understandings or arrangements by which Comerica may become bound to issue additional shares of its capital stock or other equity or voting securities of or ownership interests in Comerica, or that otherwise obligate Comerica to issue, transfer, sell, purchase, redeem or otherwise acquire, any of the foregoing (collectively, “Comerica Securities”). Other than Comerica Equity Awards, no equity-based awards (including any cash awards where the amount of payment is determined, in whole or in part, based on the price of any capital stock of Comerica or any of its Subsidiaries) are outstanding. There are no voting trusts, stockholder agreements, proxies or other agreements in effect to which Comerica or any of its Subsidiaries is a party with respect to the voting or transfer of Comerica Common Stock, capital stock or other voting or equity securities or ownership interests of Comerica or granting any stockholder or other person any registration rights. No Comerica Subsidiary owns any capital stock of Comerica.

(b) Each Comerica Stock Option (i) was granted in compliance with all applicable laws and all of the terms and conditions of the Comerica equity incentive plan pursuant to which it was issued, and (ii) has an exercise price per share equal to or greater than the fair market value of a share on the date of such grant.

(c) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica, Comerica owns, directly or indirectly, all the issued and outstanding shares of capital stock or other equity ownership interests of each of the Comerica Subsidiaries, free and clear of any liens, claims, title defects, mortgages, pledges, charges, encumbrances and security interests whatsoever (“Liens”), and all of such shares or equity ownership interests are duly authorized and validly issued and are fully paid, nonassessable (except, with respect to Subsidiaries that are depository institutions, as provided under 12 U.S.C. § 55 or any comparable provision of state law) and free of preemptive rights, with no personal liability attaching to the ownership thereof. As of the date of this Agreement, no Comerica Subsidiary has or is bound by any outstanding subscriptions, options, warrants, calls, rights, commitments or agreements of any character calling for the purchase or issuance of any shares of capital stock or any other equity security of such Subsidiary or any securities representing the right to purchase or otherwise receive any shares of capital stock or any other equity security of such Subsidiary.

#### 4.3. Authority; No Violation.

(a) Each of Comerica and Comerica Holdings has full corporate power and authority to execute and deliver this Agreement and, subject to the stockholder and other actions

described below, to consummate the transactions contemplated hereby. The execution and delivery of this Agreement and the consummation of the transactions contemplated hereby (including the Mergers) have been duly and validly approved by the Board of Directors of Comerica and Comerica Holdings. The Board of Directors of Comerica has determined that the transactions contemplated hereby (including the Mergers), on the terms and conditions set forth in this Agreement, are advisable and in the best interests of Comerica and its stockholders, has adopted and approved this Agreement and the transactions contemplated hereby (including the Mergers), and has directed that this Agreement be submitted to Comerica's stockholders for adoption at a meeting of such stockholders and has adopted a resolution to the foregoing effect. Except for (i) the adoption of this Agreement by the affirmative vote of a majority of all the votes entitled to be cast on this Agreement by all shares of Comerica Common Stock entitled to vote on this Agreement (the "Requisite Comerica Vote"), (ii) the approval and adoption of the Bank Merger Agreement by the boards of directors of Comerica Bank and Comerica Bank & Trust and by Comerica as the sole shareholder of Comerica Bank and Comerica Holdings as the sole shareholder of Comerica Bank & Trust (each of which will occur promptly following the date hereof) and (iii) the adoption of this Agreement by Comerica as Comerica Holdings' sole shareholder (which will occur promptly following the execution of this Agreement), no other corporate proceedings on the part of Comerica or Comerica Holdings are necessary to approve this Agreement or to consummate the transactions contemplated hereby. This Agreement has been duly and validly executed and delivered by each of Comerica and Comerica Holdings and (assuming due authorization, execution and delivery by Fifth Third and Fifth Third Intermediary) constitutes a valid and binding obligation of Comerica and Comerica Holdings, enforceable against Comerica and Comerica Holdings in accordance with its terms (except in all cases as such enforceability may be limited by bankruptcy, insolvency, moratorium, reorganization or similar laws of general applicability affecting the rights of creditors generally and the availability of equitable remedies (the "Enforceability Exceptions")).

(b) Neither the execution and delivery of this Agreement by Comerica and Comerica Holdings nor the consummation by Comerica and Comerica Holdings of the transactions contemplated hereby (including the Mergers and the Bank Merger), nor compliance by Comerica with any of the terms or provisions hereof, will (i) violate any provision of (A) the Comerica Charter or the Comerica Bylaws or (B) the Comerica Holdings Charter or the Comerica Holdings Bylaws or (ii) assuming that the consents and approvals referred to in Section 4.4 are duly obtained, (x) violate any law, statute, code, ordinance, rule, regulation, judgment, order, writ, decree or injunction applicable to Comerica or any of its Subsidiaries or any of their respective properties or assets or (y) violate, conflict with, result in a breach of any provision of or the loss of any benefit under, constitute a default (or an event which, with notice or lapse of time, or both, would constitute a default) under, result in the termination of or a right of termination or cancellation under, accelerate the performance required by, or result in the creation of any Lien upon any of the respective properties or assets of Comerica or any of its Subsidiaries under, any of the terms, conditions or provisions of any note, bond, mortgage, indenture, deed of trust, license, lease, agreement or other instrument or obligation to which Comerica or any of its Subsidiaries is a party, or by which they or any of their respective properties or assets may be bound, except (in the case of clauses (x) and (y) above) for such violations, conflicts, breaches, defaults, terminations, cancellations, accelerations or creations that, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica.

4.4. Consents and Approvals. Except for (i) the filing of any required applications, filings and notices, as applicable, with NASDAQ or the New York Stock Exchange (“NYSE”), and the approval of the listing of the shares of Fifth Third Common Stock and the depositary shares in respect of the New Fifth Third Preferred Stock to be issued pursuant to this Agreement on NASDAQ, (ii) the filing of any required applications, filings and notices, as applicable, with the Board of Governors of the Federal Reserve System (the “Federal Reserve Board”) under the BHC Act with respect to the Mergers and with the Office of the Comptroller of the Currency (the “OCC”) under the Bank Merger Act with respect to the Bank Mergers and approval or waiver of such applications, filings and notices, (iii) the filing of any required applications, filings and notices, as applicable, with the Texas Department of Banking, and approval of such applications, filings and notices, (iv) the filing of any required applications, filings or notices listed on Section 4.4 of the Comerica Disclosure Schedule or Section 5.4 of the Fifth Third Disclosure Schedule and approval or non-objection, as applicable, of such applications, filings and notices, (v) the filing of any required applications, filings or notices with the Financial Industry Regulatory Authority (“FINRA”) and approval of such applications, filings and notices, (vi) the filing with the Securities and Exchange Commission (the “SEC”) of a joint proxy statement in definitive form relating to the meetings of Comerica’s stockholders and Fifth Third’s shareholders to be held in connection with this Agreement and the transactions contemplated hereby (including any amendments or supplements thereto, the “Joint Proxy Statement”), and the registration statement on Form S-4 in which the Joint Proxy Statement will be included as a prospectus, to be filed with the SEC by Fifth Third in connection with the transactions contemplated by this Agreement (the “S-4”) and the declaration by the SEC of the effectiveness of the S-4, (vii) the filing of the First Step Certificates of Merger and the Second Step Merger Certificates with the Delaware Secretary and the Ohio Secretary, as applicable, the filing of the Bank Merger Certificates with the applicable Governmental Entities as required by applicable law and (viii) such filings and approvals as are required to be made or obtained under the securities or “Blue Sky” laws of various states in connection with the issuance of the shares of Fifth Third Common Stock and New Fifth Third Preferred Stock (and, in the case of the New Fifth Third Preferred Stock, depositary shares in respect thereof) pursuant to this Agreement, no consents or approvals of or filings or registrations with any court, administrative agency or commission or other governmental or regulatory authority or instrumentality or self-regulatory organization (an “SRO” and, each of the preceding, a “Governmental Entity”) are necessary in connection with (x) the execution and delivery by Comerica and Comerica Holdings of this Agreement or (y) the consummation by Comerica and Comerica Holdings of the Mergers and the other transactions contemplated hereby (including the Bank Merger). As of the date hereof, neither Comerica nor Comerica Holdings is aware of any reason why any of the necessary regulatory approvals and consents will not be received to permit consummation of the Mergers or the Bank Mergers on a timely basis.

4.5. Reports. Comerica and each of its Subsidiaries have timely filed (or furnished) all reports, forms, correspondence, registrations and statements, together with any amendments required to be made with respect thereto, that they were required to file (or furnish, as applicable) since January 1, 2023 with (i) any state regulatory authority, including the Texas Department of Banking, (ii) the SEC, (iii) the Federal Reserve Board, (iv) the FDIC, (v) any foreign regulatory authority and (vi) any SRO (clauses (i) – (vi), collectively “Regulatory Agencies”), including any report, form, correspondence, registration or statement required to be filed (or furnished, as applicable) pursuant to the laws, rules or regulations of the United States,

any state, any foreign entity, or any Regulatory Agency, and have paid all fees and assessments due and payable in connection therewith, except where the failure to file (or furnish, as applicable) such report, form, correspondence, registration or statement or to pay such fees and assessments, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica. Subject to Section 10.14, except for normal examinations conducted by a Regulatory Agency in the ordinary course of business of Comerica and its Subsidiaries, no Regulatory Agency has initiated or has pending any proceeding or, to the knowledge of Comerica, investigation into the business or operations of Comerica or any of its Subsidiaries since January 1, 2023, except where such proceedings or investigations would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica. Subject to Section 10.14, there (i) is no unresolved violation, criticism, or exception by any Regulatory Agency with respect to any report or statement relating to any examinations or inspections of Comerica or any of its Subsidiaries and (ii) has been no formal or informal inquiries by, or disagreements or disputes with, any Regulatory Agency with respect to the business, operations, policies or procedures of Comerica or any of its Subsidiaries since January 1, 2023, in each case, which would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica.

#### 4.6. Financial Statements.

(a) The financial statements of Comerica and its Subsidiaries included (or incorporated by reference) in the Comerica Reports (including the related notes, where applicable) (i) have been prepared from, and are in accordance with, the books and records of Comerica and its Subsidiaries in all material respects, (ii) fairly present in all material respects the consolidated results of operations, cash flows, changes in shareholders' equity and consolidated financial position of Comerica and its Subsidiaries for the respective fiscal periods or as of the respective dates therein set forth (subject in the case of unaudited statements to year-end audit adjustments normal in nature and amount), (iii) complied, as of their respective dates of filing with the SEC, in all material respects with applicable accounting requirements and with the published rules and regulations of the SEC with respect thereto, and (iv) have been prepared in accordance with GAAP consistently applied during the periods involved, except, in each case, as indicated in such statements or in the notes thereto. The books and records of Comerica and its Subsidiaries have been, and are being, maintained in all material respects in accordance with GAAP and any other applicable legal and accounting requirements. Since December 31, 2022, no independent public accounting firm of Comerica has resigned (or informed Comerica that it intends to resign) or been dismissed as independent public accountants of Comerica as a result of or in connection with any disagreements with Comerica on a matter of accounting principles or practices, financial statement disclosure or auditing scope or procedure.

(b) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, neither Comerica nor any of its Subsidiaries has any liability of any nature whatsoever (whether absolute, accrued, contingent or otherwise and whether due or to become due), except for those liabilities that are reflected or reserved against on the consolidated balance sheet of Comerica included in its Quarterly Report on Form 10-Q for the fiscal quarter ended June 30, 2025 (including any notes thereto) and for liabilities incurred in the ordinary course of business consistent with past practice since June 30, 2025, or in connection with this Agreement and the transactions contemplated hereby.



(c) The records, systems, controls, data and information of Comerica and its Subsidiaries are recorded, stored, maintained and operated under means (including any electronic, mechanical or photographic process, whether computerized or not) that are under the exclusive ownership and direct control of Comerica or its Subsidiaries or accountants (including all means of access thereto and therefrom), except for any non-exclusive ownership and non-direct control that would not reasonably be expected to have a Material Adverse Effect on Comerica. Comerica (x) has implemented and maintains disclosure controls and procedures (as defined in Rule 13a-15(e) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”)) to ensure that material information relating to Comerica, including its Subsidiaries, is made known to the chief executive officer and the chief financial officer of Comerica by others within those entities as appropriate to allow timely decisions regarding required disclosures and to make the certifications required by the Exchange Act and Sections 302 and 906 of the Sarbanes-Oxley Act of 2002 (the “Sarbanes-Oxley Act”), and (y) has disclosed, based on its most recent evaluation prior to the date hereof, to Comerica’s outside auditors and the audit committee of Comerica’s Board of Directors (i) any significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting (as defined in Rule 13a-15(f) of the Exchange Act) which are reasonably likely to adversely affect Comerica’s ability to record, process, summarize and report financial information, and (ii) any fraud, whether or not material, that involves management or other employees who have a significant role in Comerica’s internal controls over financial reporting. These disclosures were made in writing by management to Comerica’s auditors and audit committee. There is no reason to believe that Comerica’s outside auditors and its chief executive officer and chief financial officer will not be able to give the certifications and attestations required pursuant to the rules and regulations adopted pursuant to Section 404 of the Sarbanes-Oxley Act, without qualification, when due in the future.

(d) Since January 1, 2023, (i) neither Comerica nor any of its Subsidiaries, nor, to the knowledge of Comerica, any director, officer, auditor, accountant or representative of Comerica or any of its Subsidiaries, has received or otherwise had or obtained knowledge of any material complaint, allegation, assertion or claim, whether written or oral, regarding the accounting or auditing practices, procedures, methodologies or methods (including with respect to loan loss reserves, write-downs, charge-offs and accruals) of Comerica or any of its Subsidiaries or their respective internal accounting controls, including any material complaint, allegation, assertion or claim that Comerica or any of its Subsidiaries has engaged in questionable accounting or auditing practices, and (ii) no employee of or attorney representing Comerica or any of its Subsidiaries, whether or not employed by Comerica or any of its Subsidiaries, has reported evidence of a material violation of securities laws or banking laws, breach of fiduciary duty or similar violation by Comerica or any of its Subsidiaries or any of their respective officers, directors, employees or agents to the Board of Directors of Comerica or any committee thereof or the Board of Directors or similar governing body of any Comerica Subsidiary or any committee thereof, or to the knowledge of Comerica, to any director or officer of Comerica or any Comerica Subsidiary.

4.7. Broker’s Fees. With the exception of the engagement of J.P. Morgan Securities LLC and Keefe, Bruyette & Woods, Inc., neither Comerica nor any Comerica Subsidiary nor any of their respective officers or directors has employed any broker, finder or financial advisor or incurred any liability for any broker’s fees, commissions or finder’s fees in

connection with the Mergers or the other transactions contemplated by this Agreement. Comerica has disclosed to Fifth Third as of the date hereof the engagement letter pursuant to which J.P. Morgan Securities LLC and Keefe, Bruyette & Woods, Inc. have been engaged by Comerica in connection with the Mergers and the other transactions contemplated hereunder.

4.8. Absence of Certain Changes or Events.

(a) Since December 31, 2024, there has not been any effect, change, event, circumstance, condition, occurrence or development that has had or would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica.

(b) Since December 31, 2024, through the date of this Agreement, Comerica and its Subsidiaries have carried on their respective businesses in all material respects in the ordinary course.

4.9. Legal and Regulatory Proceedings.

(a) Except as would not reasonably be expected to, either individually or in the aggregate, have a Material Adverse Effect on Comerica, neither Comerica nor any of its Subsidiaries is a party to any, and there are no outstanding or pending or, to the knowledge of Comerica, threatened, legal, administrative, arbitral or other proceedings, claims, actions or governmental or regulatory investigations of any nature against Comerica or any of its Subsidiaries or any of their current or former directors or executive officers or challenging the validity or propriety of the transactions contemplated by this Agreement.

(b) There is no material injunction, order, judgment, decree, or regulatory restriction imposed upon Comerica, any of its Subsidiaries or the assets of Comerica or any of its Subsidiaries (or that, upon consummation of the Mergers, would apply to the Surviving Entity or any of its affiliates).

4.10. Taxes and Tax Returns.

(a) Except as would not reasonably be expected to, either individually or in the aggregate, have a Material Adverse Effect on Comerica: Each of Comerica and its Subsidiaries has duly and timely filed (including all applicable extensions) all Tax Returns required to be filed by it, and all such Tax Returns are true, correct, and complete; neither Comerica nor any of its Subsidiaries is the beneficiary of any extension of time within which to file any Tax Return (other than extensions to file Tax Returns obtained in the ordinary course); all Taxes of Comerica and its Subsidiaries (whether or not shown on any Tax Returns) that are due have been fully and timely paid; each of Comerica and its Subsidiaries has withheld and paid all Taxes required to have been withheld and paid in connection with amounts paid or owing to any employee, creditor, stockholder, independent contractor or other third party; neither Comerica nor any of its Subsidiaries has been granted any extension or waiver of the limitation period applicable to any Tax that remains in effect; neither Comerica nor any of its Subsidiaries has received written notice of assessment or proposed assessment in connection with any amount of Taxes, and there are no threatened in writing or pending disputes, claims, audits, examinations or other proceedings regarding any Tax of Comerica or its Subsidiaries; neither Comerica nor any of its Subsidiaries is a party to or is bound by any Tax sharing,

allocation or indemnification agreement or arrangement (other than (x) such an agreement or arrangement exclusively between or among Comerica and its Subsidiaries or (y) commercial agreements the principal purpose of which does not relate to Taxes); neither Comerica nor any of its Subsidiaries (A) has been a member of an affiliated group filing a consolidated federal income Tax Return for which the statute of limitations is open (other than a group the common parent of which is or was Comerica) or (B) has any liability for the Taxes of any person (other than Comerica or any of its Subsidiaries) under Treasury Regulation Section 1.1502-6 (or any similar provision of state, local or foreign law), as a transferee or successor or otherwise by operation of law; neither Comerica nor any of its Subsidiaries has been, within the past two (2) years, a “distributing corporation” or a “controlled corporation” (within the meaning of Section 355(a)(1)(A) of the Code) in a distribution of stock intending to qualify for tax-free treatment under Section 355 of the Code; and neither Comerica nor any of its Subsidiaries has participated in a “listed transaction” within the meaning of Treasury Regulation Section 1.6011-4(b)(2).

(b) As used in this Agreement, the term “Tax” or “Taxes” means all federal, state, local, and foreign income, excise, gross receipts, ad valorem, profits, gains, property, capital, sales, transfer, use, license, payroll, employment, social security, severance, unemployment, withholding, duties, tariff, excise, windfall profits, intangibles, franchise, backup withholding, value added, alternative or add-on minimum, estimated and other taxes, charges, levies or like assessments together with all interest, penalties, additions to tax and additional amounts thereon.

(c) As used in this Agreement, the term “Tax Return” means any return, declaration, report, claim for refund, or information return or statement relating to Taxes, including any schedule or attachment thereto, and including any amendment thereof, supplied or required to be supplied to a Governmental Entity.

#### 4.11. Employees.

(a) Except as would not result in any material liability to Comerica and its Subsidiaries, taken as a whole, each Comerica Benefit Plan has been established, operated and administered in accordance with its terms and the requirements of all applicable laws, including ERISA and the Code. For purposes of this Agreement, the term “Comerica Benefit Plans” means all employee benefit plans (as defined in Section 3(3) of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”)), whether or not subject to ERISA, and all equity, bonus or incentive, deferred compensation, retiree medical or life insurance, supplemental retirement, severance, termination, change in control, retention, employment, welfare, insurance, medical, fringe or other benefit plans, programs, agreements, contracts, policies, arrangements or remuneration of any kind with respect to which Comerica or any Subsidiary or any trade or business of Comerica or any of its Subsidiaries, whether or not incorporated, all of which together with Comerica would be deemed a “single employer” within the meaning of Section 4001 of ERISA (a “Comerica ERISA Affiliate”), is a party or has any current or future obligation or that are maintained, contributed to or sponsored by Comerica or any of its Subsidiaries or any Comerica ERISA Affiliate for the benefit of any current or former employee, officer, director or independent contractor of Comerica or any of its Subsidiaries or any

Comerica ERISA Affiliate, excluding, in each case, any “multiemployer plan” within the meaning of Section 4001(a)(3) of ERISA (a “Multiemployer Plan”).

(b) Comerica has made available to Fifth Third true and complete copies of each material Comerica Benefit Plan and the following related documents, to the extent applicable: (i) all summary plan descriptions, amendments, modifications or material supplements, (ii) the most recent annual report (Form 5500) filed with the Internal Revenue Service (the “IRS”), (iii) the most recently received IRS determination letter, and (iv) the most recently prepared actuarial report.

(c) The IRS has issued a favorable determination letter or opinion with respect to each Comerica Benefit Plan that is intended to be qualified under Section 401(a) of the Code (the “Comerica Qualified Plans”) and the related trust, which letter or opinion has not been revoked (nor has revocation been threatened), and, to the knowledge of Comerica, there are no existing circumstances and no events have occurred that would reasonably be expected to adversely affect the qualified status of any Comerica Qualified Plans or the related trust.

(d) Except as would not result in any material liability to Comerica and its Subsidiaries, taken as a whole, with respect to each Comerica Benefit Plan that is subject to Section 302 or Title IV of ERISA or Section 412, 430 or 4971 of the Code: (i) the minimum funding standard under Section 302 of ERISA and Sections 412 and 430 of the Code has been satisfied and no waiver of any minimum funding standard or any extension of any amortization period has been requested or granted, (ii) no such plan is in “at-risk” status for purposes of Section 430 of the Code, (iii) the present value of accrued benefits under such Comerica Benefit Plan, based upon the actuarial assumptions used for funding purposes in the most recent actuarial report prepared by such Comerica Benefit Plan’s actuary with respect to such Comerica Benefit Plan, did not, as of its latest valuation date, exceed the then current fair market value of the assets of such Comerica Benefit Plan allocable to such accrued benefits, (iv) no reportable event within the meaning of Section 4043(c) of ERISA for which the 30-day notice requirement has not been waived has occurred, (v) all premiums to the Pension Benefit Guaranty Corporation (the “PBGC”) have been timely paid in full, (vi) no liability (other than for premiums to the PBGC) under Title IV of ERISA has been or is expected to be incurred by Comerica or any of its Subsidiaries, and (vii) the PBGC has not instituted proceedings to terminate any such Comerica Benefit Plan.

(e) None of Comerica and its Subsidiaries nor any Comerica ERISA Affiliate has, at any time during the last six (6) years, contributed to or been obligated to contribute to a Multiemployer Plan or a plan that has two (2) or more contributing sponsors at least two (2) of whom are not under common control, within the meaning of Section 4063 of ERISA (a “Multiple Employer Plan”), and none of Comerica and its Subsidiaries nor any Comerica ERISA Affiliate has incurred any liability that has not been satisfied to a Multiemployer Plan or Multiple Employer Plan as a result of a complete or partial withdrawal (as those terms are defined in Part I of Subtitle E of Title IV of ERISA) from a Multiemployer Plan or Multiple Employer Plan.

(f) Except as would not result in any material liability to Comerica and its Subsidiaries, taken as a whole, no Comerica Benefit Plan provides for any post-employment or post-retirement health or medical or life insurance benefits for retired, former or current



employees or beneficiaries or dependents thereof, except as required by Section 4980B of the Code.

(g) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, all contributions required to be made to any Comerica Benefit Plan by applicable law or by any plan document or other contractual undertaking, and all premiums due or payable with respect to insurance policies funding any Comerica Benefit Plan, for any period through the date hereof, have been timely made or paid in full or, to the extent not required to be made or paid on or before the date hereof, have been fully reflected on the books and records of Comerica.

(h) There are no pending or threatened claims (other than claims for benefits in the ordinary course), lawsuits or arbitrations which have been asserted or instituted, and, to Comerica's knowledge, no set of circumstances exists which may reasonably give rise to a claim or lawsuit, against the Comerica Benefit Plans, any fiduciaries thereof with respect to their duties to the Comerica Benefit Plans or the assets of any of the trusts under any of the Comerica Benefit Plans that would reasonably be expected to result in any liability of Comerica or any of its Subsidiaries in an amount that would be material to Comerica and its Subsidiaries, taken as a whole.

(i) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, none of Comerica and its Subsidiaries nor any Comerica ERISA Affiliate has engaged in any "prohibited transaction" (as defined in Section 4975 of the Code or Section 406 of ERISA) which would reasonably be expected to subject any of the Comerica Benefit Plans or their related trusts, Comerica, any of its Subsidiaries or any Comerica ERISA Affiliate to any material Tax or penalty imposed under Section 4975 of the Code or Section 502 of ERISA.

(j) Neither the execution and delivery of this Agreement nor the consummation of the transactions contemplated hereby will (either alone or in conjunction with any other event) result in the acceleration of vesting, exercisability, funding or delivery of, or increase in the amount or value of, any payment, right or other benefit to any employee, officer, director or other service provider of Comerica or any of its Subsidiaries, or result in any limitation on the right of Comerica or any of its Subsidiaries to amend, merge, terminate or receive a reversion of assets from any Comerica Benefit Plan or related trust on or after the Effective Time.

(k) No Comerica Benefit Plan provides for the gross-up or reimbursement of Taxes under Section 409A or 4999 of the Code, or otherwise.

(l) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, there are no pending or, to Comerica's knowledge, threatened labor grievances or unfair labor practice claims or charges against Comerica or any of its Subsidiaries, or any strikes or other labor disputes against Comerica or any of its Subsidiaries. Neither Comerica nor any of its Subsidiaries is party to or bound by any collective bargaining or similar agreement with any labor organization, or work rules or practices agreed to with any labor organization or employee association applicable to employees of

Comerica or any of its Subsidiaries and, except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, there are no pending or, to the knowledge of Comerica, threatened organizing efforts by any union or other group seeking to represent any employees of Comerica or any of its Subsidiaries.

(m) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, Comerica and its Subsidiaries are in compliance with, and since January 1, 2023 have complied with, all laws regarding employment and employment practices, terms and conditions of employment, wages and hours, paid sick leave, classification of employees and independent contractors, equitable pay practices, privacy rights, labor disputes, employment discrimination, sexual or racial harassment or discrimination, workers' compensation or long-term disability policies, retaliation, immigration, family and medical leave, occupational safety and health and other laws in respect of any reduction in force (including notice, information and consultation requirements).

(n) (i) No written allegations of sexual or racial harassment or sexual or race-based misconduct have been made since January 1, 2023 against any individual in his or her capacity as an officer or director of Comerica who is subject to the reporting requirements of Section 16(a) of the Exchange Act ("Comerica Insider"), (ii) since January 1, 2023, neither Comerica nor any of its Subsidiaries has entered into any settlement agreement related to allegations of sexual or racial harassment or sexual or race-based misconduct by any Comerica Insiders, and (iii) there are no proceedings currently pending or, to the knowledge of Comerica, threatened related to any allegations of sexual or racial harassment or sexual or race-based misconduct by any individual in his or her capacity as a Comerica Insider.

4.12. SEC Reports. Comerica has previously made available to Fifth Third an accurate and complete copy of each (a) final registration statement, prospectus, report, schedule and definitive proxy statement filed with or furnished to the SEC since December 31, 2022 by Comerica pursuant to the Securities Act of 1933, as amended (the "Securities Act"), or the Exchange Act (the "Comerica Reports") and (b) communication mailed by Comerica to its stockholders since December 31, 2022 and prior to the date hereof, and no such Comerica Report or communication, as of the date thereof (and, in the case of registration statements and proxy statements, on the dates of effectiveness and the dates of the relevant meetings, respectively), contained any untrue statement of a material fact or omitted to state any material fact required to be stated therein or necessary in order to make the statements therein, in light of the circumstances in which they were made, not misleading, except that information filed or furnished as of a later date (but before the date of this Agreement) shall be deemed to modify information as of an earlier date. Since December 31, 2022, as of their respective dates, all Comerica Reports filed or furnished under the Securities Act and the Exchange Act complied in all material respects with the published rules and regulations of the SEC with respect thereto. As of the date of this Agreement, no executive officer of Comerica has failed in any respect to make the certifications required of him or her under Section 302 or 906 of the Sarbanes-Oxley Act. As of the date of this Agreement, there are no outstanding comments from, or unresolved issues raised by, the SEC with respect to any of the Comerica Reports.

#### 4.13. Compliance with Applicable Law.

(a) Comerica and each of its Subsidiaries hold, and have at all times since December 31, 2022, held, all licenses, registrations, franchises, certificates, variances, permits, charters and authorizations necessary for the lawful conduct of their respective businesses and ownership of their respective properties, rights and assets under and pursuant to each (and have paid all fees and assessments due and payable in connection therewith), except where neither the cost of failure to hold nor the cost of obtaining and holding such license, registration, franchise, certificate, variance, permit, charter or authorization (nor the failure to pay any fees or assessments) would, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica, and to the knowledge of Comerica, no suspension or cancellation of any such necessary license, registration, franchise, certificate, variance, permit, charter or authorization is threatened.

(b) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica, Comerica and each of its Subsidiaries have complied with and are not in default or violation under any applicable law, statute, order (including any Executive Order), rule, regulation, policy and/or guideline of any Governmental Entity relating to Comerica or any of its Subsidiaries, including all laws, rules and regulations related to data protection or privacy (including laws relating to the privacy and security of data or information that constitutes “personal data,” “nonpublic personal information,” “personal information”, “sensitive data” or any other equivalent term as defined under or otherwise protected by applicable law (“Personal Data”, and such laws, collectively, “Privacy Laws”)), the USA PATRIOT Act, the Bank Secrecy Act, the Equal Credit Opportunity Act and Regulation B, the Fair Housing Act, the Community Reinvestment Act, the Fair Credit Reporting Act, the Truth in Lending Act and Regulation Z, the Home Mortgage Disclosure Act, the Fair Debt Collection Practices Act, the Electronic Fund Transfer Act, the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Interagency Policy Statement on Retail Sales of Nondeposit Investment Products, the SAFE Mortgage Licensing Act of 2008, the Real Estate Settlement Procedures Act and Regulation X, Title V of the Gramm-Leach-Bliley Act, Executive Order 14,331, any and all sanctions or regulations enforced by the Office of Foreign Assets Control of the United States Department of Treasury and any other law, policy or guideline relating to bank secrecy, discriminatory lending, financing or leasing practices, consumer protection, money laundering prevention, foreign assets control, U.S. sanctions laws and regulations, Sections 23A and 23B of the Federal Reserve Act, the Sarbanes-Oxley Act, and all agency requirements relating to the origination, sale and servicing of mortgage and consumer loans. Comerica and its Subsidiaries have established and maintain a system of internal controls designed to ensure compliance in all material respects by Comerica and its Subsidiaries with applicable financial recordkeeping and reporting requirements of applicable money laundering prevention laws in jurisdictions where Comerica and its Subsidiaries conduct business.

(c) Comerica Bank has a Community Reinvestment Act rating of “satisfactory” or better in its most recently completed Community Reinvestment Act examination.

(d) Since December 31, 2022, Comerica and its Subsidiaries have maintained and implemented written information privacy and cybersecurity programs that provide for

reasonable measures, consistent with accepted industry practices, Privacy Laws and all contracts to the extent such contracts relate to the use or processing of Personal Data, that are designed to protect the privacy, confidentiality and security of all (i) Personal Data, including against any loss or misuse of, or unauthorized or unlawful access to, such Personal Data and (ii) hardware, Software, systems, servers, networks, data communications lines, devices, and other information technology and equipment (collectively, “IT Assets”) owned or used by Comerica or its Subsidiaries, including from any unauthorized access or interference, disabling codes or instructions, spyware, trojan horses, worms, viruses, or other Software routines that permit or cause unauthorized access to, or disruption, impairment, disablement, or destruction of, any Software, data or other materials (“Malicious Code”), in each case of the foregoing, including protection against any (x) unauthorized or unlawful operations performed upon Personal Data or IT Assets, or (y) other act or omission that compromises the security or confidentiality of Personal Data or IT Assets (each of clauses (i) and (ii), a “Security Breach”). To the knowledge of Comerica, Comerica and its Subsidiaries have not experienced any Security Breach (A) that would, individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica or (B) in a manner that has resulted or is reasonably likely to result in a duty to notify any Governmental Entity or any person. To the knowledge of Comerica, there are no data security or other technological vulnerabilities with respect to IT Assets owned or used by Comerica or its Subsidiaries that, individually or in the aggregate, would reasonably be expected to have a Material Adverse Effect on Comerica. To the knowledge of Comerica, since December 31, 2022, neither Comerica nor any of its Subsidiaries has been the subject of any inquiry or action of any Governmental Entity with respect to any unauthorized processing of Personal Data or material violation of any Privacy Law. The IT Assets owned or used by Comerica or its Subsidiaries are free from any Malicious Code and have not, since December 31, 2022, experienced any failure, malfunction or unscheduled outage, in each case, that would, individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica.

(e) Without limitation, none of Comerica or any of its Subsidiaries, or to the knowledge of Comerica, any director, officer, employee, agent or other person acting on behalf of Comerica or any of its Subsidiaries has, directly or indirectly, (i) used any funds of Comerica or any of its Subsidiaries for unlawful contributions, unlawful gifts, unlawful entertainment or other expenses relating to political activity, (ii) made any unlawful payment to foreign or domestic governmental officials or employees or to foreign or domestic political parties or campaigns from funds of Comerica or any of its Subsidiaries, (iii) violated any provision that would result in the violation of the Foreign Corrupt Practices Act of 1977, as amended, or any similar law, (iv) established or maintained any unlawful fund of monies or other assets of Comerica or any of its Subsidiaries, (v) made any fraudulent entry on the books or records of Comerica or any of its Subsidiaries, (vi) made any unlawful bribe, unlawful rebate, unlawful payoff, unlawful influence payment, unlawful kickback or other unlawful payment to any person, private or public, regardless of form, whether in money, property or services, to obtain favorable treatment in securing business, to obtain special concessions for Comerica or any of its Subsidiaries, to pay for favorable treatment for business secured or to pay for special concessions already obtained for Comerica or any of its Subsidiaries, or is currently subject to any United States sanctions administered by the Office of Foreign Assets Control of the United States Treasury Department or (vii) has engaged during the past five years with any person designated by a Governmental Entity as of “primary money laundering concern,” except, in each case (i)

through (vii), as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica.

(f) As of the date hereof, each of Comerica, Comerica Bank and Comerica Bank & Trust is “well-capitalized” (as such term is defined in the relevant regulations of the Federal Reserve Board).

(g) To the knowledge of Comerica, none of Comerica, Comerica Bank and Comerica Bank & Trust, nor any of their respective Subsidiaries, has knowingly maintained policies that require Comerica, Comerica Bank and Comerica Bank & Trust to engage in “politicized or unlawful debanking,” as such term is defined in Executive Order 14,331, or unlawful debanking on the basis of religion.

(h) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica, (i) Comerica and each of its Subsidiaries have properly administered all accounts for which it acts as a fiduciary, including accounts for which it serves as a trustee, agent, custodian, personal representative, guardian, conservator or investment advisor, in accordance with the terms of the governing documents and applicable state, federal and foreign law; and (ii) none of Comerica, any of its Subsidiaries, or any of its or its Subsidiaries’ directors, officers or employees, has committed any breach of trust or fiduciary duty with respect to any such fiduciary account, and the accountings for each such fiduciary account are true, correct and complete and accurately reflect the assets and results of such fiduciary account.

#### 4.14. Certain Contracts.

(a) Except as set forth in Section 4.14(a) of the Comerica Disclosure Schedule or as filed with any Comerica Reports, as of the date hereof, neither Comerica nor any of its Subsidiaries is a party to or bound by any contract, arrangement, commitment or understanding (whether written or oral), but excluding any Comerica Benefit Plan and any contract, arrangement, commitment or understanding solely among Comerica and any wholly owned Subsidiaries of Comerica or solely among wholly owned Subsidiaries of Comerica:

(i) which is a “material contract” (as such term is defined in Item 601(b)(10) of Regulation S-K of the SEC);

(ii) which contains a provision that materially restricts the conduct of any line of business by Comerica or any of its Subsidiaries or upon consummation of the Mergers will materially restrict the ability of the Surviving Entity or any of its affiliates to engage in any line of business or in any geographic region (including any exclusivity or exclusive dealing provisions with such an effect);

(iii) with or to a labor union or guild with respect to any employees of Comerica or any of its Subsidiaries (including any collective bargaining agreement);

(iv) any of the benefits of or obligations under which will arise or be increased or accelerated by the occurrence of the execution and delivery of this Agreement, receipt of the Requisite Comerica Vote or the announcement or consummation of any of the



transactions contemplated by this Agreement, or under which a right of cancellation or termination will arise as a result thereof, or the value of any of the benefits of which will be calculated on the basis of any of the transactions contemplated by this Agreement, where such increase or acceleration of benefits or obligations, right of cancellation or termination, or change in calculation of value of benefits would, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Comerica;

(v) (A) that relates to the incurrence of indebtedness by Comerica or any of its Subsidiaries, including any sale and leaseback transactions, securitizations, off-balance sheet financing arrangements, capitalized leases and other similar financing arrangements (other than deposit liabilities, trade payables, federal funds purchased, advances and loans from the Federal Home Loan Bank and securities sold under agreements to repurchase, in each case incurred in the ordinary course of business consistent with past practice), or (B) that provides for the guarantee, support, indemnification, assumption or endorsement by Comerica or any of its Subsidiaries of, or any similar commitment by Comerica or any of its Subsidiaries with respect to, the obligations, liabilities or indebtedness of any other person, in the case of each of clauses (A) and (B), in the principal amount of \$20,000,000 or more;

(vi) pursuant to which (A) any license, covenant not to sue or other right is granted or received by Comerica or any of its Subsidiaries with respect to material Intellectual Property (other than non-exclusive licenses for commercially available off-the-shelf Software or granted to customers in the ordinary course of business) or (B) Comerica or any of its Subsidiaries has assigned, transferred, sold, purchased, acquired or obtained, any material Intellectual Property, or has agreed to do any of the foregoing;

(vii) that grants any right of first refusal, right of first offer or similar right with respect to any material assets, rights or properties of Comerica or its Subsidiaries, taken as a whole;

(viii) which creates future payment obligations in excess of \$5,000,000 per annum (other than any such contracts which are terminable by Comerica or any of its Subsidiaries on sixty (60) days or less notice without any required payment or other conditions, other than the condition of notice) other than with respect to indebtedness disclosed in any Comerica Reports;

(ix) that is a settlement, consent or similar agreement and contains any material continuing obligations of Comerica or any of its Subsidiaries; or

(x) that relates to the acquisition or disposition of any person, business or asset and under which Comerica or its Subsidiaries have or may have a material obligation or liability.

Each contract, arrangement, commitment or understanding of the type described in this Section 4.14(a), whether or not set forth in the Comerica Disclosure Schedule, is referred to herein as a “Comerica Contract.” Comerica has made available to Fifth Third true, correct and complete copies of each Comerica Contract in effect as of the date hereof.

(b) (i) Each Comerica Contract is valid and binding on Comerica or one of its Subsidiaries, as applicable, and in full force and effect, except as, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica, (ii) Comerica and each of its Subsidiaries have in all material respects complied with and performed all obligations required to be complied with or performed by any of them to date under each Comerica Contract, except where such noncompliance or nonperformance, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica, (iii) to the knowledge of Comerica, each third-party counterparty to each Comerica Contract has in all material respects complied with and performed all obligations required to be complied with and performed by it to date under such Comerica Contract, except where such noncompliance or nonperformance, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica, (iv) neither Comerica nor any of its Subsidiaries has knowledge of, or has received notice of, any violation of any Comerica Contract by any of the other parties thereto which would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica and (v) no event or condition exists which constitutes or, after notice or lapse of time or both, will constitute, a material breach or default on the part of Comerica or any of its Subsidiaries, or to the knowledge of Comerica, any other party thereto, of or under any such Comerica Contract, except where such breach or default, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica.

4.15. Agreements with Regulatory Agencies. Subject to Section 10.14, neither Comerica nor any of its Subsidiaries is subject to any cease-and-desist or other order or enforcement action issued by, or is a party to any written agreement, consent agreement or memorandum of understanding with, or is a party to any commitment letter or similar undertaking to, or is subject to any order or directive by, or has been ordered to pay any civil money penalty by, or has been since January 1, 2023, a recipient of any supervisory letter from, or since January 1, 2023, has adopted any policies, procedures or board resolutions at the request or suggestion of, any Regulatory Agency or other Governmental Entity that currently restricts in any material respect or would reasonably be expected to restrict in any material respect the conduct of its business or that in any material manner relates to its capital adequacy, its ability to pay dividends, its credit or risk management policies, its management or its business (each, whether or not set forth in the Comerica Disclosure Schedule, a “Comerica Regulatory Agreement”), nor has Comerica or any of its Subsidiaries been advised in writing, or to Comerica’s knowledge, orally, since January 1, 2023, by any Regulatory Agency or other Governmental Entity that it is considering issuing, initiating, ordering, or requesting any such Comerica Regulatory Agreement.

4.16. Environmental Matters. Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, Comerica and its Subsidiaries are in compliance, and have complied since January 1, 2023, with any federal, state or local law, regulation, order, decree, permit, authorization, common law or agency requirement relating to: (a) the protection or restoration of the environment, health and safety as it relates to hazardous substance exposure or natural resource damages, (b) the handling, use, presence, disposal, release or threatened release of, or exposure to, any hazardous substance, or (c) noise, odor, wetlands, indoor air, pollution, contamination or any injury to persons or property from exposure to any hazardous substance (collectively, “Environmental



Laws”). There are no legal, administrative, arbitral or other proceedings, claims or actions, or to the knowledge of Comerica, any private environmental investigations or remediation activities or governmental investigations of any nature seeking to impose, or that could reasonably be expected to result in the imposition, on Comerica or any of its Subsidiaries of any liability or obligation arising under any Environmental Law pending or threatened against Comerica, which liability or obligation would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica. To the knowledge of Comerica, there is no reasonable basis for any such proceeding, claim, action or governmental investigation that would impose any liability or obligation that would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica. Comerica is not subject to any agreement, order, judgment, decree, letter agreement or memorandum of agreement by or with any court, Governmental Entity, Regulatory Agency or other third party imposing any liability or obligation with respect to the foregoing that would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica.

4.17. Investment Securities and Commodities. Each of Comerica and its Subsidiaries has good title in all material respects to all securities and commodities owned by it (except those sold under repurchase agreements) which are material to Comerica’s business on a consolidated basis, free and clear of any Lien, except to the extent such securities or commodities are pledged in the ordinary course of business to secure obligations of Comerica or its Subsidiaries. Such securities and commodities are valued on the books of Comerica in accordance with GAAP in all material respects.

4.18. Real Property. Comerica or a Comerica Subsidiary (a) has good and marketable title to all the real property reflected in the latest audited balance sheet included in the Comerica Reports as being owned by Comerica or a Comerica Subsidiary or acquired after the date thereof which are material to Comerica’s business on a consolidated basis (except properties sold or otherwise disposed of since the date thereof in the ordinary course of business) (the “Comerica Owned Properties”), free and clear of all material Liens, except (i) statutory Liens securing payments not yet due, (ii) Liens for real property Taxes not yet due and payable, (iii) easements, rights of way, and other similar encumbrances that do not materially affect the value or use of the properties or assets subject thereto or affected thereby or otherwise materially impair business operations at such properties and (iv) such imperfections or irregularities of title or Liens as do not materially affect the value or use of the properties or assets subject thereto or affected thereby or otherwise materially impair business operations at such properties (collectively, “Permitted Encumbrances”), and (b) is the lessee of all leasehold estates reflected in the latest audited financial statements included in such Comerica Reports or acquired after the date thereof which are material to Comerica’s business on a consolidated basis (except for leases that have expired by their terms since the date thereof) (such leasehold estates, collectively with the Comerica Owned Properties, the “Comerica Real Property”), free and clear of all material Liens, except for Permitted Encumbrances, and is in possession of the properties purported to be leased thereunder, and each such lease is valid without default thereunder by the lessee or, to the knowledge of Comerica, the lessor. There are no pending or, to the knowledge of Comerica, threatened condemnation proceedings against the Comerica Real Property.

4.19. Intellectual Property. Comerica and each of its Subsidiaries owns, or is licensed to use (in each case, free and clear of any material Liens), all Intellectual Property

necessary for the conduct of their respective businesses as currently conducted. Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica: (a) (i) to the knowledge of Comerica, the use of any Intellectual Property by Comerica and its Subsidiaries does not infringe, misappropriate or otherwise violate the rights of any person and is in accordance with any applicable license pursuant to which Comerica or any of its Subsidiaries acquired the right to use any Intellectual Property, and (ii) no person has asserted in writing to Comerica that Comerica or any of its Subsidiaries has infringed, misappropriated or otherwise violated the Intellectual Property rights of such person, (b) to the knowledge of Comerica, no person is challenging, infringing on or otherwise violating any right of Comerica or any of its Subsidiaries with respect to any Intellectual Property owned by and/or licensed to Comerica or its Subsidiaries, and (c) neither Comerica nor any of its Subsidiaries has received any written notice of any pending claim with respect to any Intellectual Property owned by Comerica or any of its Subsidiaries, and Comerica and its Subsidiaries have taken commercially reasonable actions to avoid the abandonment, cancellation or unenforceability of all Intellectual Property owned or licensed, respectively, by Comerica and its Subsidiaries. Comerica and its Subsidiaries have taken commercially reasonable efforts to protect the Trade Secrets owned or held by Comerica and its Subsidiaries, as applicable. Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, no Software that is owned by Comerica or its Subsidiaries is subject to any obligation or condition under any license identified as an open source license by the Open Source Initiative ([www.opensource.org/](http://www.opensource.org/)) or any other license that conditions the distribution of such Software on (i) the disclosure, licensing or distribution of any source code for any portion of such Software, (ii) the granting to licensees of the right to make derivative works or other modifications to such Software, (iii) the licensing under terms that allow such Software or portions thereof or interfaces therefor to be reverse engineered, reverse assembled or disassembled (other than by operation of law), or (iv) redistribution of such Software at no license fee. For purposes of this Agreement, (x) “Intellectual Property” means all rights in any jurisdiction throughout the world in or to: trademarks, service marks, brand names, internet domain names, social media identifiers, logos, symbols, certification marks, trade dress and other indications of origin, the goodwill associated with the foregoing and symbolized thereby and registrations in any jurisdiction of, and applications in any jurisdiction to register, the foregoing, including any extension, modification or renewal of any such registration or application; inventions, discoveries and ideas, whether patentable or not, in any jurisdiction; patents, applications for patents (including divisions, continuations, continuations in part and renewal applications), all improvements thereto, and any renewals, extensions or reissues thereof, in any jurisdiction; nonpublic information, trade secrets and know-how, including processes, technologies, protocols, source code, data, databases, formulae, prototypes and confidential information and rights in any jurisdiction to limit the use or disclosure thereof by any person (collectively, “Trade Secrets”); writings and other works, whether copyrightable or not and whether in published or unpublished works, in any jurisdiction; and registrations or applications for registration of copyrights in any jurisdiction, and any renewals or extensions thereof; and any similar intellectual property or proprietary rights; and (y) “Software” means any computer program, application, microcode, firmware, middleware or software, including operating systems, software implementations of algorithms, models and methodologies, in each case, whether in source code, object code or other form or format, including libraries, subroutines and other components thereof, and all documentation relating thereto.

4.20. Related Party Transactions.

(a) As of the date hereof, except as set forth in any Comerica Reports, there are no transactions or series of related transactions, agreements, arrangements or understandings, nor are there any currently proposed transactions or series of related transactions, between Comerica or any of its Subsidiaries, on the one hand, and any current or former director or “executive officer” (as defined in Rule 3b-7 under the Exchange Act) of Comerica or any of its Subsidiaries or any person who beneficially owns (as defined in Rules 13d-3 and 13d-5 of the Exchange Act) five percent (5%) or more of the outstanding Comerica Common Stock (or any of such person’s immediate family members or affiliates) (other than Subsidiaries of Comerica) on the other hand, of the type required to be reported in any Comerica Report pursuant to Item 404 of Regulation S-K promulgated under the Exchange Act.

(b) There are no outstanding written or oral loan, loan agreement, note or borrowing arrangement (including leases, credit enhancements, commitments, guarantees and interest-bearing assets) (collectively, “Loans”) made by Comerica or any of its Subsidiaries to any “executive officer” or other “insider” (as each such term is defined in Regulation O promulgated by the Federal Reserve Board) of Comerica or its Subsidiaries, other than Loans that are subject to and that were made and continue to be in compliance with Regulation O or that are exempt therefrom.

4.21. State Takeover Laws. The Board of Directors of Comerica has approved this Agreement and the transactions contemplated hereby and has taken all such other necessary actions as required to render inapplicable to such agreements and transactions the provisions of any potentially applicable takeover laws of any state, including any “moratorium,” “control share,” “fair price,” “takeover” or “interested stockholder” law or any similar provisions of the Comerica Charter or Comerica Bylaws (collectively, with any similar provisions of the Fifth Third Articles or Fifth Third Code of Regulations, “Takeover Statutes”). No appraisal or dissenters’ rights will be available to the holders of Comerica Common Stock or Comerica Preferred Stock in connection with the Merger.

4.22. Reorganization. Comerica has not taken any action and is not aware of the existence of any fact or circumstance that could reasonably be expected to prevent or impede (i) each of the Merger or the Bank Mergers from qualifying as a “reorganization” within the meaning of Section 368(a) of the Code or (ii) the Second Step Merger from qualifying as a “liquidation” as described in Section 332 of the Code.

4.23. Opinion. Prior to the execution of this Agreement, the Board of Directors of Comerica has received an opinion (which if initially rendered orally, has been or will be confirmed in writing) from J.P. Morgan Securities LLC to the effect that as of the date of such opinion and based upon and subject to the various assumptions, limitations, qualifications and other matters set forth in the written opinion, the Exchange Ratio in the proposed Merger is fair, from a financial point of view, to the holders of Comerica Common Stock. Such opinion has not been amended or rescinded as of the date of this Agreement.

4.24. Comerica Information. The information relating to Comerica and its Subsidiaries or that is provided by Comerica or its Subsidiaries or their respective representatives

for inclusion in the Joint Proxy Statement and the S-4, or in any other document filed with any Regulatory Agency or Governmental Entity in connection herewith, will not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements therein, in light of the circumstances in which they are made, not misleading. The Joint Proxy Statement (except for such portions thereof that relate only to Fifth Third or any of its Subsidiaries) will comply in all material respects with the provisions of the Exchange Act and the rules and regulations thereunder.

#### 4.25. Loan Portfolio.

(a) As of the date hereof, except as set forth in Section 4.25(a) of the Comerica Disclosure Schedule, neither Comerica nor any of its Subsidiaries is a party to any Loans in which Comerica or any Subsidiary of Comerica is a creditor that, as of June 30, 2025, had an outstanding balance of \$5,000,000 or more and under the terms of which the obligor was, as of June 30, 2025, over ninety (90) days or more delinquent in payment of principal or interest. Set forth in Section 4.25(a) of the Comerica Disclosure Schedule is a true, correct and complete list of (i) all of the Loans of Comerica and its Subsidiaries that, as of June 30, 2025, had an outstanding balance of \$5,000,000 and were classified by Comerica as “Other Loans Specially Mentioned,” “Special Mention,” “Substandard,” “Doubtful,” “Loss,” “Classified,” “Criticized,” “Credit Risk Assets,” “Concerned Loans,” “Watch List” or words of similar import, together with the principal amount of each such Loan and the identity of the borrower thereunder, together with the aggregate principal amount of such Loans, by category of Loan (e.g., commercial, consumer, etc.), together with the aggregate principal amount of such Loans by category and (ii) each asset of Comerica or any of its Subsidiaries that, as of June 30, 2025, is classified as “Other Real Estate Owned” and the book value thereof. Since December 31, 2022 through the date hereof, Comerica has not changed, in any material respect, its process or standards for the classifications referred to in the immediately preceding sentence.

(b) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, each Loan of Comerica or any of its Subsidiaries (i) is evidenced by notes, agreements or other evidences of indebtedness that are true, genuine and what they purport to be, (ii) to the extent carried on the books and records of Comerica and its Subsidiaries as secured Loans, has been secured by valid charges, mortgages, pledges, security interests, restrictions, claims, liens or encumbrances, as applicable, which have been perfected and (iii) is the legal, valid and binding obligation of the obligor named therein, enforceable in accordance with its terms, subject to the Enforceability Exceptions.

(c) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Comerica, each outstanding Loan of Comerica or any of its Subsidiaries (including Loans held for resale to investors) was solicited and originated, and is and has been administered and, where applicable, serviced, and the relevant Loan files are being maintained, in all material respects in accordance with the relevant notes or other credit or security documents, the written underwriting standards of Comerica and its Subsidiaries (and, in the case of Loans held for resale to investors, the underwriting standards, if any, of the applicable investors) and with all applicable federal, state and local laws, regulations and rules.

4.26. Insurance. Except as would not reasonably be expected, either individually or in the aggregate, to have a Material Adverse Effect on Comerica, (a) Comerica and its Subsidiaries are insured with reputable insurers against such risks and in such amounts as the management of Comerica reasonably has determined to be prudent and consistent with industry practice, and Comerica and its Subsidiaries are in compliance in all material respects with their insurance policies and are not in default under any of the terms thereof, (b) each such policy is outstanding and in full force and effect and, except for policies insuring against potential liabilities of current or former officers, directors and employees of Comerica and its Subsidiaries, Comerica or the relevant Subsidiary thereof is the sole beneficiary of such policies, (c) all premiums and other payments due under any such policy have been paid, and all claims thereunder have been filed in due and timely fashion, (d) there is no claim for coverage by Comerica or any of its Subsidiaries pending under any insurance policy as to which coverage has been questioned, denied or disputed by the underwriters of such insurance policy and (e) neither Comerica nor any of its Subsidiaries has received notice of any threatened termination of, material premium increase with respect to, or material alteration of coverage under, any insurance policies.

4.27. Insurance Subsidiary.

(a) Except as would not reasonably be expected, individually or in the aggregate, to have a Material Adverse Effect on Comerica, (i) since January 1, 2023, at the time each agent, representative, producer, reinsurance intermediary, wholesaler, third-party administrator, distributor, broker, employee or other person authorized to sell, produce, manage or administer products on behalf of any Comerica Subsidiary ("Comerica Agent") wrote, sold, produced, managed, administered or procured business for a Comerica Subsidiary, such Comerica Agent was, at the time the Comerica Agent wrote or sold business, duly licensed for the type of activity and business written, sold, produced, managed, administered or produced to the extent required by applicable law, (ii) no Comerica Agent has been since January 1, 2023, or is currently, in violation (or with or without notice or lapse of time or both, would be in violation) of any law, rule or regulation applicable to such Comerica Agent's writing, sale, management, administration or production of insurance business for any Comerica Insurance Subsidiary and (iii) each Comerica Agent was appointed by Comerica or a Comerica Insurance Subsidiary in compliance with applicable insurance laws, rules and regulations and all processes and procedures undertaken with respect to such Comerica Agent were undertaken in compliance with applicable insurance laws, rules and regulations. "Comerica Insurance Subsidiary" means each Subsidiary of Comerica through which insurance operations is conducted.

(b) Except as would not reasonably be expected, individually or in the aggregate, to have a Material Adverse Effect on Comerica, (i) since January 1, 2023, Comerica and the Comerica Insurance Subsidiaries have made all required notices, submissions, reports or other filings under applicable insurance holding company statutes, (ii) all contracts, agreements, arrangements and transactions in effect between any Comerica Insurance Subsidiary and any affiliate are in compliance in all material respects with the requirements of all applicable insurance holding company statutes, and (iii) each Comerica Insurance Subsidiary has operated and otherwise been in compliance with all applicable insurance laws, rules and regulations.



#### 4.28. Broker-Dealer Subsidiary.

(a) Comerica has a Subsidiary that is registered, licensed or qualified, or are required to be registered, licensed or qualified, as a broker-dealer in accordance with any regulatory or legal requirement applicable to such Comerica Subsidiary (each, a “Comerica Broker-Dealer Subsidiary”). Except as would not reasonably be expected to, either individually or in the aggregate, have a Material Adverse Effect on Comerica: (i) the Comerica Broker-Dealer Subsidiary is duly registered under the Exchange Act as a broker-dealer with the SEC and is in compliance with the applicable provisions of the Exchange Act, including the net capital requirements and customer protection requirements thereof; (ii) the Comerica Broker-Dealer Subsidiary is a member in good standing with FINRA and any other applicable SROs and in compliance with all applicable rules and regulations of FINRA and any such SRO of which it is a member or which otherwise has authority over it; (iii) the Comerica Broker-Dealer Subsidiary (and each registered representative thereof) is duly registered, licensed or qualified as a broker-dealer or registered representative, as applicable, under, and in compliance with, the applicable laws of all jurisdictions in which it is required to be so registered and each such registration, license or qualification is in full force and effect and in good standing; and (iv) there is no action, suit, proceeding or investigation pending or, to the knowledge of Comerica, threatened that would reasonably be likely to lead to the revocation, amendment, failure to renew, limitation, suspension or restriction of any such registrations, licenses and qualifications.

(b) Except as would not reasonably be expected to, either individually or in the aggregate, have a Material Adverse Effect on Comerica, (i) neither the Comerica Broker-Dealer Subsidiaries nor any “associated person” thereof (A) is or has been ineligible to serve as a broker-dealer or an associated person of a broker-dealer under Section 15(b) of the Exchange Act, (B) is subject to a “statutory disqualification” as defined in Section 3(a)(39) of the Exchange Act or (C) is subject to a disqualification that would be a basis for censure, limitations on the activities, functions or operations of, or suspension or revocation of the registration of any Comerica Broker-Dealer Subsidiary as broker-dealer, municipal securities dealer, government securities broker or government securities dealer under Section 15, Section 15B or Section 15C of the Exchange Act, and (ii) there is no action, suit, proceeding or investigation pending or, to the knowledge of Comerica, threatened, that is reasonably likely to result in any such person being deemed ineligible as described in clause (A), subject to a “statutory disqualification” as described in clause (B) or subject to a disqualification as described in clause (C).

#### 4.29. No Other Representations or Warranties.

(a) Except for the representations and warranties made by Comerica in this Article IV, neither Comerica nor any other person makes any express or implied representation or warranty with respect to Comerica, its Subsidiaries, or their respective businesses, operations, assets, liabilities, conditions (financial or otherwise) or prospects, and Comerica hereby disclaims any such other representations or warranties. In particular, without limiting the foregoing disclaimer, neither Comerica nor any other person makes or has made any representation or warranty to Fifth Third or any of its affiliates or representatives with respect to (i) any financial projection, forecast, estimate, budget or prospective information relating to Comerica, any of its Subsidiaries or their respective businesses or (ii) except for the representations and warranties made by Comerica in this Article IV, any oral or written

information presented to Fifth Third or any of its affiliates or representatives in the course of their due diligence investigation of Comerica, the negotiation of this Agreement or in the course of the transactions contemplated hereby.

(b) Comerica acknowledges and agrees that neither Fifth Third nor any other person on behalf of Fifth Third has made or is making, and Comerica has not relied upon, any express or implied representation or warranty other than those contained in Article V.

## **ARTICLE V**

### **REPRESENTATIONS AND WARRANTIES OF FIFTH THIRD**

Except (a) as disclosed in the disclosure schedule delivered by Fifth Third to Comerica concurrently herewith (the “Fifth Third Disclosure Schedule”); provided, that (i) no such item is required to be set forth as an exception to a representation or warranty if its absence would not result in the related representation or warranty being deemed untrue or incorrect, (ii) the mere inclusion of an item in the Fifth Third Disclosure Schedule as an exception to a representation or warranty shall not be deemed an admission by Fifth Third that such item represents a material exception or fact, event or circumstance or that such item would reasonably be expected to have a Material Adverse Effect and (iii) any disclosures made with respect to a section of this Article V shall be deemed to qualify (1) any other section of this Article V specifically referenced or cross-referenced and (2) other sections of this Article V to the extent it is reasonably apparent on its face (notwithstanding the absence of a specific cross reference) from a reading of the disclosure that such disclosure applies to such other sections, (b) as disclosed in any Fifth Third Reports filed with the SEC by Fifth Third since December 31, 2022 and prior to the date hereof (but disregarding risk factor disclosures contained under the heading “Risk Factors,” or disclosures of risks set forth in any “forward-looking statements” disclaimer or any other statements that are similarly non-specific or cautionary, predictive or forward-looking in nature) or (c) as contemplated by Section 10.14, Fifth Third hereby represents and warrants to Comerica as follows:

#### **5.1. Corporate Organization.**

(a) Each of Fifth Third and Fifth Third Intermediary is a corporation duly organized, validly existing and in good standing under the laws of the State of Ohio. Fifth Third is a bank holding company duly registered under the BHC Act and has elected to be treated as a financial holding company under the BHC Act. Each of Fifth Third and Fifth Third Intermediary has the corporate power and authority to own, lease or operate all of its properties and assets and to carry on its business as it is now being conducted in all material respects. Fifth Third is duly licensed or qualified to do business and in good standing in each jurisdiction in which the nature of the business conducted by it or the character or location of the properties and assets owned, leased or operated by it makes such licensing, qualification or standing necessary, except where the failure to be so licensed or qualified or to be in good standing would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third. True and complete copies of Fifth Third’s Amended Articles of Incorporation (the “Fifth Third Articles”), the Fifth Third Intermediary Articles, Fifth Third’s Code of Regulations (the “Fifth Third Code of Regulations”) and the Fifth Third Intermediary Code of Regulations, in each case,



as in effect as of the date of this Agreement, have previously been made available by Fifth Third to Comerica.

(b) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third, each Subsidiary of Fifth Third (a “Fifth Third Subsidiary”) (i) is duly organized and validly existing under the laws of its jurisdiction of organization, (ii) is duly licensed or qualified to do business and, where such concept is recognized under applicable law, in good standing in all jurisdictions (whether federal, state, local or foreign) where its ownership, leasing or operation of property or the conduct of its business requires it to be so licensed or qualified or in good standing and (iii) has all requisite corporate power and authority to own, lease or operate its properties and assets and to carry on its business as now conducted. There are no restrictions on the ability of Fifth Third or any Subsidiary of Fifth Third to pay dividends or distributions except, in the case of Fifth Third or a Subsidiary that is a regulated entity, for restrictions on dividends or distributions generally applicable to all similarly regulated entities. Fifth Third Bank is the only depository institution Subsidiary of Fifth Third, and the deposit accounts of Fifth Third Bank are insured by the FDIC through the Deposit Insurance Fund (as defined in Section 3(y) of the Bank Merger Act) to the fullest extent permitted by law, all premiums and assessments required to be paid in connection therewith have been paid when due, and no proceedings for the termination of such insurance are pending or threatened. Section 5.1(b) of the Fifth Third Disclosure Schedule sets forth a true and complete list of all Subsidiaries of Fifth Third as of the date hereof. True and complete copies of the Organizational Documents of Fifth Third Bank as in effect as of the date of this Agreement have previously been made available by Fifth Third to Comerica. There is no person whose results of operations, cash flows, changes in shareholders’ equity or financial position are consolidated in the financial statements of Fifth Third other than the Fifth Third Subsidiaries.

## 5.2. Capitalization.

(a) As of the date hereof, the authorized capital stock of Fifth Third consists of 2,000,000,000 shares of Fifth Third Common Stock and 500,000 shares of preferred stock, without par value (“Fifth Third Preferred Stock”). As of September 30, 2025, following the redemption on September 30, 2025 of all outstanding shares of Comerica’s 4.500% Fixed-Rate Reset Non-Cumulative Perpetual Preferred Stock, Series L, and all outstanding receipts evidencing depository shares thereof, no shares of capital stock or other voting securities of Fifth Third are issued, reserved for issuance or outstanding, other than (i) 660,973,674 shares of Fifth Third Common Stock issued and outstanding, (ii) 262,918,907 shares of Fifth Third Common Stock held in treasury, (iii) 200,000 shares of 6.00% Non-Cumulative Perpetual Class B Preferred Stock, Series A (“Fifth Third Series A, Class B Preferred Stock”), (iv) 18,000 shares of 6.625% Fixed-to-Floating Rate Non-Cumulative Perpetual Preferred Stock, Series I, (v) 10,000 shares of 4.95% Non-Cumulative Perpetual Preferred Stock, Series K, (vi) 10,000,000 depository shares representing a 1/1000th ownership interest in a share of 4.95% Non-Cumulative Perpetual Preferred Stock, Series K, (vii) 8,000,000 depository shares representing a 1/40th ownership interest in a share of Fifth Third Series A, Class B Preferred Stock, (viii) 18,000,000 depository shares representing a 1/1000th ownership interest in a share of 6.625% Fixed-to-Floating Rate Non-Cumulative Perpetual Preferred Stock, Series I, (ix) 66,117 shares of Fifth Third Common Stock underlying stock options, (x) 3,420,425 shares of Fifth Third Common Stock underlying stock appreciation rights, (xi) 9,922,777.13 shares of Fifth Third Common Stock underlying

restricted stock units, (xii) 0 shares of Fifth Third Common Stock underlying restricted stock awards, (xiii) 844,109 shares of Fifth Third Common Stock underlying performance share awards assuming that performance with respect thereto is achieved at the target level, (xiv) 51,050,000 shares of Fifth Third Common Stock reserved for issuance for future grants under the Fifth Third Stock Plans, (xv) 24,000 shares of 5.10% Fixed-to-Floating Rate Non-Cumulative Perpetual Preferred Stock, Series H, (xvi) 12,000 shares of 4.90% Fixed-to-Floating Rate Non-Cumulative Perpetual Preferred Stock, Series J, (xvii) 600,000 depositary shares representing a 1/25<sup>th</sup> ownership interest in a share of 5.10% Fixed-to-Floating Rate Non-Cumulative Perpetual Preferred Stock, Series H and (xviii) 300,000 depositary shares representing a 1/25<sup>th</sup> ownership interest in a share of 4.90% Fixed-to-Floating Rate Non-Cumulative Perpetual Preferred Stock, Series J. All the issued and outstanding shares of Fifth Third Common Stock and Fifth Third Preferred Stock have been duly authorized and validly issued and are fully paid, nonassessable and free of preemptive rights, with no personal liability attaching to the ownership thereof. Fifth Third is current on all dividends payable on the outstanding shares of Fifth Third Preferred Stock, and has complied in all material respects with terms and conditions thereof. There are no bonds, debentures, notes or other indebtedness that have the right to vote on any matters on which shareholders of Fifth Third may vote. As of the date hereof, no trust preferred or subordinated debt securities of Fifth Third are issued or outstanding. Other than Fifth Third Restricted Stock Awards, Fifth Third RSU Awards, Fifth Third PSU Awards and Fifth Third Preferred Stock, issued prior to the date of this Agreement as described in this Section 5.2(a), as of the date of this Agreement there are no outstanding subscriptions, options, warrants, stock appreciation rights, phantom units, scrip, rights to subscribe to, preemptive rights, anti-dilutive rights, rights of first refusal or similar rights, puts, calls, commitments or agreements of any character relating to, or securities or rights convertible or exchangeable into or exercisable for, shares of capital stock or other voting or equity securities of or ownership interest in Fifth Third, or contracts, commitments, understandings or arrangements by which Fifth Third may become bound to issue additional shares of its capital stock or other equity or voting securities of or ownership interests in Fifth Third or that otherwise obligate Fifth Third to issue, transfer, sell, purchase, redeem or otherwise acquire, any of the foregoing (collectively, “Fifth Third Securities”). Other than the Fifth Third Equity Awards, no equity-based awards (including any cash awards where the amount of payment is determined in whole or in part based on the price of any capital stock of Fifth Third or any of its Subsidiaries) are outstanding. There are no voting trusts, shareholder agreements, proxies or other agreements in effect to which Fifth Third or any of its Subsidiaries is a party with respect to the voting or transfer of Fifth Third Common Stock, capital stock or other voting or equity securities or ownership interests of Fifth Third or granting any shareholder or other person any registration rights. No Fifth Third Subsidiary owns any capital stock of Fifth Third.

(b) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third, Fifth Third owns, directly or indirectly, all the issued and outstanding shares of capital stock or other equity ownership interests of each of the Fifth Third Subsidiaries, free and clear of any Liens, and all of such shares or equity ownership interests are duly authorized and validly issued and are fully paid, nonassessable (except, with respect to Subsidiaries that are depository institutions, as provided under 12 U.S.C. § 55 or any comparable provision of state law) and free of preemptive rights, with no personal liability attaching to the ownership thereof. As of the date of this Agreement, no Fifth Third Subsidiary has or is bound by any outstanding subscriptions, options, warrants,

calls, rights, commitments or agreements of any character calling for the purchase or issuance of any shares of capital stock or any other equity security of such Subsidiary or any securities representing the right to purchase or otherwise receive any shares of capital stock or any other equity security of such Subsidiary.

5.3. Authority; No Violation.

(a) Each of Fifth Third and Fifth Third Intermediary has full corporate power and authority to execute and deliver this Agreement and, subject to the shareholder and other actions described below, to consummate the transactions contemplated hereby. The execution and delivery of this Agreement and the consummation of the transactions contemplated hereby (including the Mergers) have been duly and validly approved by the Boards of Directors of Fifth Third and Fifth Third Intermediary. The Board of Directors of Fifth Third has determined that the transactions contemplated hereby (including the Mergers and the issuance of shares of Fifth Third Common Stock in the Merger (the “Stock Issuance”)), on the terms and conditions set forth in this Agreement, are advisable and in the best interests of Fifth Third and its shareholders, has adopted and approved this Agreement and the transactions contemplated hereby (including the Mergers and the Stock Issuance), and has directed that the Stock Issuance be submitted to Fifth Third’s shareholders for approval at a meeting of such shareholders and has adopted a resolution to the foregoing effect. Except for (i) the approval of the Stock Issuance by the affirmative vote of the majority of the voting power of Fifth Third (the “Requisite Fifth Third Vote”), (ii) the approval and adoption of the Bank Merger Agreement by the board of directors of Fifth Third Bank and Fifth Third Intermediary as Fifth Third Bank’s sole shareholder (which will occur promptly following the date hereof) and (iii) the adoption of this Agreement by Fifth Third as Fifth Third Intermediary’s sole shareholder (which will occur promptly following the execution of this Agreement), no other corporate proceedings on the part of Fifth Third or Fifth Third Intermediary are necessary to approve this Agreement or to consummate the transactions contemplated hereby. The Fifth Third Common Stock and Fifth Third Series A, Class B Preferred Stock are the only securities of Fifth Third entitled to vote in respect of the Requisite Fifth Third Vote. This Agreement has been duly and validly executed and delivered by each of Fifth Third and Fifth Third Intermediary and (assuming due authorization, execution and delivery by Comerica and Comerica Holdings) constitutes a valid and binding obligation of Fifth Third and Fifth Third Intermediary, enforceable against Fifth Third and Fifth Third Intermediary in accordance with its terms (except in all cases as such enforceability may be limited by the Enforceability Exceptions).

(b) Neither the execution and delivery of this Agreement by Fifth Third and Fifth Third Intermediary, nor the consummation by Fifth Third and Fifth Third Intermediary of the transactions contemplated hereby (including the Mergers and the Bank Merger), nor compliance by Fifth Third with any of the terms or provisions hereof, will (i) violate any provision of (A) the Fifth Third Articles or the Fifth Third Code of Regulations or (B) the Fifth Third Intermediary Articles or the Fifth Third Intermediary Code of Regulations or (ii) assuming that the consents and approvals referred to in Section 5.4 are duly obtained, (x) violate any law, statute, code, ordinance, rule, regulation, judgment, order, writ, decree or injunction applicable to Fifth Third or any of its Subsidiaries or any of their respective properties or assets or (y) violate, conflict with, result in a breach of any provision of or the loss of any benefit under, constitute a default (or an event which, with notice or lapse of time, or both, would constitute a default)

under, result in the termination of or a right of termination or cancellation under, accelerate the performance required by, or result in the creation of any Lien upon any of the respective properties or assets of Fifth Third or any of its Subsidiaries under, any of the terms, conditions or provisions of any note, bond, mortgage, indenture, deed of trust, license, lease, agreement or other instrument or obligation to which Fifth Third or any of its Subsidiaries is a party, or by which they or any of their respective properties or assets may be bound, except (in the case of clauses (x) and (y) above) for such violations, conflicts, breaches, defaults, terminations, cancellations, accelerations or creations that, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Comerica.

5.4. Consents and Approvals. Except for (i) the filing of any required applications, filings and notices, as applicable, with NASDAQ or the NYSE, and the approval of the listing of the shares of Fifth Third Common Stock and the depositary shares in respect of the New Fifth Third Preferred Stock to be issued pursuant to this Agreement on NASDAQ, (ii) the filing of any required applications, filings and notices, as applicable, with the Federal Reserve Board under the BHC Act with respect to the Mergers and with the OCC under the Bank Merger Act with respect to the Bank Mergers and approval or waiver of such applications, filings and notices, (iii) the filing of any required applications, filings and notices, as applicable, with the Texas Department of Banking, and approval of such applications, filings and notices, (iv) the filing of any required applications, filings or notices listed on Section 4.4 of the Comerica Disclosure Schedule or Section 5.4 of the Fifth Third Disclosure Schedule and approval or non-objection, as applicable, of such applications, filings and notices, (v) the filing of any required applications, filings or notices with FINRA and approval of such applications, filings and notices, (vi) the filing with the SEC of the Joint Proxy Statement, and the S-4 and the declaration by the SEC of the effectiveness of the S-4, (vii) the filing of the First Step Certificates of Merger and the Second Step Merger Certificates with the Delaware Secretary and the Ohio Secretary, as applicable, the filing of the Bank Merger Certificates with the applicable Governmental Entities as required by applicable law and (viii) such filings and approvals as are required to be made or obtained under the securities or “Blue Sky” laws of various states in connection with the issuance of the shares of Fifth Third Common Stock and New Fifth Third Preferred Stock (and, in the case of the New Fifth Third Preferred Stock, depositary shares in respect thereof) pursuant to this Agreement, no consents or approvals of or filings or registrations with any Governmental Entity are necessary in connection with (x) the execution and delivery by Fifth Third and Fifth Third Intermediary of this Agreement or (y) the consummation by Fifth Third and Fifth Third Intermediary of the Mergers and the other transactions contemplated hereby (including the Bank Merger). As of the date hereof, neither Fifth Third nor Fifth Third Intermediary is aware of any reason why any of the necessary regulatory approvals and consents will not be received to permit consummation of the Mergers or the Bank Mergers on a timely basis.

5.5. Reports. Fifth Third and each of its Subsidiaries have timely filed (or furnished) all reports, forms, correspondence, registrations and statements, together with any amendments required to be made with respect thereto, that they were required to file (or furnish, as applicable) since January 1, 2023 with any Regulatory Agencies, including any report, form, correspondence, registration or statement required to be filed (or furnished, as applicable) pursuant to the laws, rules or regulations of the United States, any state, any foreign entity, or any Regulatory Agency, and have paid all fees and assessments due and payable in connection therewith, except where the failure to file (or furnish, as applicable) such report, form,



correspondence, registration or statement or to pay such fees and assessments, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Fifth Third. Subject to Section 10.14, except for normal examinations conducted by a Regulatory Agency in the ordinary course of business of Fifth Third and its Subsidiaries, no Regulatory Agency has initiated or has pending any proceeding or, to the knowledge of Fifth Third, investigation into the business or operations of Fifth Third or any of its Subsidiaries since January 1, 2023, except where such proceedings or investigations would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third. Subject to Section 10.14, there (i) is no unresolved violation, criticism, or exception by any Regulatory Agency with respect to any report or statement relating to any examinations or inspections of Fifth Third or any of its Subsidiaries and (ii) has been no formal or informal inquiries by, or disagreements or disputes with, any Regulatory Agency with respect to the business, operations, policies or procedures of Fifth Third or any of its Subsidiaries since January 1, 2023, in each case, which would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third.

#### 5.6. Financial Statements.

(a) The financial statements of Fifth Third and its Subsidiaries included (or incorporated by reference) in the Fifth Third Reports (including the related notes, where applicable) (i) have been prepared from, and are in accordance with, the books and records of Fifth Third and its Subsidiaries in all material respects, (ii) fairly present in all material respects the consolidated results of operations, cash flows, changes in shareholders' equity and consolidated financial position of Fifth Third and its Subsidiaries for the respective fiscal periods or as of the respective dates therein set forth (subject in the case of unaudited statements to year-end audit adjustments normal in nature and amount), (iii) complied, as of their respective dates of filing with the SEC, in all material respects with applicable accounting requirements and with the published rules and regulations of the SEC with respect thereto, and (iv) have been prepared in accordance with GAAP consistently applied during the periods involved, except, in each case, as indicated in such statements or in the notes thereto. The books and records of Fifth Third and its Subsidiaries have been, and are being, maintained in all material respects in accordance with GAAP and any other applicable legal and accounting requirements. Since December 31, 2022, no independent public accounting firm of Fifth Third has resigned (or informed Fifth Third that it intends to resign) or been dismissed as independent public accountants of Fifth Third as a result of or in connection with any disagreements with Fifth Third on a matter of accounting principles or practices, financial statement disclosure or auditing scope or procedure.

(b) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, neither Fifth Third nor any of its Subsidiaries has any liability of any nature whatsoever (whether absolute, accrued, contingent or otherwise and whether due or to become due), except for those liabilities that are reflected or reserved against on the consolidated balance sheet of Fifth Third included in its Quarterly Report on Form 10-Q for the fiscal quarter ended June 30, 2025 (including any notes thereto) and for liabilities incurred in the ordinary course of business consistent with past practice since June 30, 2025, or in connection with this Agreement and the transactions contemplated hereby.

(c) The records, systems, controls, data and information of Fifth Third and its Subsidiaries are recorded, stored, maintained and operated under means (including any electronic, mechanical or photographic process, whether computerized or not) that are under the exclusive ownership and direct control of Fifth Third or its Subsidiaries or accountants (including all means of access thereto and therefrom), except for any non-exclusive ownership and non-direct control that would not reasonably be expected to have a Material Adverse Effect on Fifth Third. Fifth Third (x) has implemented and maintains disclosure controls and procedures (as defined in Rule 13a-15(e) of the Exchange Act) to ensure that material information relating to Fifth Third, including its Subsidiaries, is made known to the chief executive officer and the chief financial officer of Fifth Third by others within those entities as appropriate to allow timely decisions regarding required disclosures and to make the certifications required by the Exchange Act and Sections 302 and 906 of the Sarbanes-Oxley Act, and (y) has disclosed, based on its most recent evaluation prior to the date hereof, to Fifth Third's outside auditors and the audit committee of Fifth Third's Board of Directors (i) any significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting (as defined in Rule 13a-15(f) of the Exchange Act) which are reasonably likely to adversely affect Fifth Third's ability to record, process, summarize and report financial information, and (ii) any fraud, whether or not material, that involves management or other employees who have a significant role in Fifth Third's internal controls over financial reporting. These disclosures were made in writing by management to Fifth Third's auditors and audit committee. There is no reason to believe that Fifth Third's outside auditors and its chief executive officer and chief financial officer will not be able to give the certifications and attestations required pursuant to the rules and regulations adopted pursuant to Section 404 of the Sarbanes-Oxley Act, without qualification, when due in the future.

(d) Since January 1, 2023, (i) neither Fifth Third nor any of its Subsidiaries, nor, to the knowledge of Fifth Third, any director, officer, auditor, accountant or representative of Fifth Third or any of its Subsidiaries, has received or otherwise had or obtained knowledge of any material complaint, allegation, assertion or claim, whether written or oral, regarding the accounting or auditing practices, procedures, methodologies or methods (including with respect to loan loss reserves, write-downs, charge-offs and accruals) of Fifth Third or any of its Subsidiaries or their respective internal accounting controls, including any material complaint, allegation, assertion or claim that Fifth Third or any of its Subsidiaries has engaged in questionable accounting or auditing practices, and (ii) no employee of or attorney representing Fifth Third or any of its Subsidiaries, whether or not employed by Fifth Third or any of its Subsidiaries, has reported evidence of a material violation of securities laws or banking laws, breach of fiduciary duty or similar violation by Fifth Third or any of its Subsidiaries or any of their respective officers, directors, employees or agents to the Board of Directors of Fifth Third or any committee thereof or the Board of Directors or similar governing body of any Fifth Third Subsidiary or any committee thereof, or to the knowledge of Fifth Third, to any director or officer of Fifth Third or any Fifth Third Subsidiary.

5.7. Broker's Fees. With the exception of the engagement of Goldman Sachs & Co. LLC, neither Fifth Third nor any Fifth Third Subsidiary nor any of their respective officers or directors has employed any broker, finder or financial advisor or incurred any liability for any broker's fees, commissions or finder's fees in connection with the Mergers or the other transactions contemplated by this Agreement. Fifth Third has disclosed to Comerica as of the



date hereof the engagement letter pursuant to which Goldman Sachs & Co. LLC has been engaged by Fifth Third in connection with the Mergers and the other transactions contemplated hereunder.

5.8. Absence of Certain Changes or Events.

(a) Since December 31, 2024, there has not been any effect, change, event, circumstance, condition, occurrence or development that has had or would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third.

(b) Since December 31, 2024, through the date of this Agreement, Fifth Third and its Subsidiaries have carried on their respective businesses in all material respects in the ordinary course.

5.9. Legal and Regulatory Proceedings.

(a) Except as would not reasonably be expected to, either individually or in the aggregate, have a Material Adverse Effect on Fifth Third, none of Fifth Third or any of its Subsidiaries is a party to any, and there are no outstanding or pending or, to the knowledge of Fifth Third, threatened, legal, administrative, arbitral or other proceedings, claims, actions or governmental or regulatory investigations of any nature against Fifth Third or any of its Subsidiaries or any of their current or former directors or executive officers or challenging the validity or propriety of the transactions contemplated by this Agreement.

(b) There is no material injunction, order, judgment, decree, or regulatory restriction imposed upon Fifth Third or any of its Subsidiaries or the assets of Fifth Third or any of its Subsidiaries (or that, upon consummation of the Mergers, would apply to the Surviving Entity or any of its affiliates).

5.10. Taxes and Tax Returns. Except as would not reasonably be expected to, either individually or in the aggregate, have a Material Adverse Effect on Fifth Third: Fifth Third and each of its Subsidiaries have duly and timely filed (including all applicable extensions) all Tax Returns required to be filed by it, and all such Tax Returns are true, correct, and complete; all Taxes of Fifth Third and its Subsidiaries (whether or not shown on any Tax Returns) that are due have been fully and timely paid; each of Fifth Third and its Subsidiaries has withheld and paid all Taxes required to have been withheld and paid in connection with amounts paid or owing to any employee, creditor, shareholder, independent contractor or other third party.

5.11. Employees.

(a) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, each Fifth Third Benefit Plan has been established, operated and administered in accordance with its terms and the requirements of all applicable laws, including ERISA and the Code. For purposes of this Agreement, the term “Fifth Third Benefit Plans” means all employee benefit plans (as defined in Section 3(3) of ERISA), whether or not subject to ERISA, and all equity, bonus or incentive, deferred compensation, retiree medical or life insurance, supplemental retirement, severance, termination

change in control, retention, employment, welfare, insurance, medical, fringe or other benefit plans, programs, agreements, contracts, policies, arrangements or remuneration of any kind with respect to which Fifth Third or any Subsidiary or any trade or business of Fifth Third or any of its Subsidiaries, whether or not incorporated, all of which together with Fifth Third would be deemed a “single employer” within the meaning of Section 4001 of ERISA (a “Fifth Third ERISA Affiliate”), is a party or has any current or future obligation or that are maintained, contributed to or sponsored by Fifth Third or any of its Subsidiaries or any Fifth Third ERISA Affiliate for the benefit of any current or former employee, officer, director or independent contractor of Fifth Third or any of its Subsidiaries or any Fifth Third ERISA Affiliate, excluding, in each case, any Multiemployer Plan.

(b) The IRS has issued a favorable determination letter or opinion with respect to each Fifth Third Benefit Plan that is intended to be qualified under Section 401(a) of the Code (the “Fifth Third Qualified Plans”) and the related trust, which letter or opinion has not been revoked (nor has revocation been threatened), and, to the knowledge of Fifth Third, there are no existing circumstances and no events have occurred that would reasonably be expected to adversely affect the qualified status of any Fifth Third Qualified Plans or the related trust.

(c) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, with respect to each Fifth Third Benefit Plan that is subject to Section 302 or Title IV of ERISA or Section 412, 430 or 4971 of the Code: (i) the minimum funding standard under Section 302 of ERISA and Sections 412 and 430 of the Code has been satisfied and no waiver of any minimum funding standard or any extension of any amortization period has been requested or granted, (ii) no such plan is in “at-risk” status for purposes of Section 430 of the Code, (iii) the present value of accrued benefits under such Fifth Third Benefit Plan, based upon the actuarial assumptions used for funding purposes in the most recent actuarial report prepared by such Fifth Third Benefit Plan’s actuary with respect to such Fifth Third Benefit Plan, did not, as of its latest valuation date, exceed the then current fair market value of the assets of such Fifth Third Benefit Plan allocable to such accrued benefits, (iv) no reportable event within the meaning of Section 4043(c) of ERISA for which the 30-day notice requirement has not been waived has occurred, (v) all premiums to the PBGC have been timely paid in full, (vi) no liability (other than for premiums to the PBGC) under Title IV of ERISA has been or is expected to be incurred by Fifth Third or any of its Subsidiaries, and (vii) the PBGC has not instituted proceedings to terminate any such Fifth Third Benefit Plan.

(d) None of Fifth Third and its Subsidiaries nor any Fifth Third ERISA Affiliate has, at any time during the last six (6) years, contributed to or been obligated to contribute to a Multiemployer Plan or a Multiple Employer Plan, and none of Fifth Third and its Subsidiaries nor any Fifth Third ERISA Affiliate has incurred any liability that has not been satisfied to a Multiemployer Plan or Multiple Employer Plan as a result of a complete or partial withdrawal (as those terms are defined in Part I of Subtitle E of Title IV of ERISA) from a Multiemployer Plan or Multiple Employer Plan.

(e) There are no pending or threatened claims (other than claims for benefits in the ordinary course), lawsuits or arbitrations which have been asserted or instituted, and, to Fifth Third’s knowledge, no set of circumstances exists which may reasonably give rise to a

claim or lawsuit, against the Fifth Third Benefit Plans, any fiduciaries thereof with respect to their duties to the Fifth Third Benefit Plans or the assets of any of the trusts under any of the Fifth Third Benefit Plans that would reasonably be expected to result in any liability of Fifth Third or any of its Subsidiaries in an amount that would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third.

(f) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, none of Fifth Third and its Subsidiaries nor any Fifth Third ERISA Affiliate has engaged in any “prohibited transaction” (as defined in Section 4975 of the Code or Section 406 of ERISA) which would reasonably be expected to subject any of the Fifth Third Benefit Plans or their related trusts, Fifth Third, any of its Subsidiaries or any Fifth Third ERISA Affiliate to any material Tax or penalty imposed under Section 4975 of the Code or Section 502 of ERISA.

(g) Neither the execution and delivery of this Agreement nor the consummation of the transactions contemplated hereby will (either alone or in conjunction with any other event) result in the acceleration of vesting, exercisability, funding or delivery of, or increase in the amount or value of, any payment, right or other benefit to any employee, officer, director or other service provider of Fifth Third or any of its Subsidiaries, or result in any limitation on the right of Fifth Third or any of its Subsidiaries to amend, merge, terminate or receive a reversion of assets from any Fifth Third Benefit Plan or related trust on or after the Effective Time.

(h) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, there are no pending or, to Fifth Third’s knowledge, threatened labor grievances or unfair labor practice claims or charges against Fifth Third or any of its Subsidiaries, or any strikes or other labor disputes against Fifth Third or any of its Subsidiaries. Neither Fifth Third nor any of its Subsidiaries is party to or bound by any collective bargaining or similar agreement with any labor organization, or work rules or practices agreed to with any labor organization or employee association applicable to employees of Fifth Third or any of its Subsidiaries and, except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, there are no pending or, to the knowledge of Fifth Third, threatened organizing efforts by any union or other group seeking to represent any employees of Fifth Third or any of its Subsidiaries.

(i) Except as would not reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third, Fifth Third and its Subsidiaries are in compliance with, and since January 1, 2023 have complied with, all laws regarding employment and employment practices, terms and conditions of employment, wages and hours, paid sick leave, classification of employees and independent contractors, equitable pay practices, privacy rights, labor disputes, employment discrimination, sexual or racial harassment or discrimination, workers’ compensation or long-term disability policies, retaliation, immigration, family and medical leave, occupational safety and health and other laws in respect of any reduction in force (including notice, information and consultation requirements).

5.12. SEC Reports. Fifth Third has previously made available to Comerica an accurate and complete copy of each (a) final registration statement, prospectus, report, schedule

and definitive proxy statement filed with or furnished to the SEC since December 31, 2022 by Fifth Third pursuant to the Securities Act or the Exchange Act (the “Fifth Third Reports”) and (b) communication mailed by Fifth Third to its shareholders since December 31, 2022 and prior to the date hereof, and no such Fifth Third Report or communication, as of the date thereof (and, in the case of registration statements and proxy statements, on the dates of effectiveness and the dates of the relevant meetings, respectively), contained any untrue statement of a material fact or omitted to state any material fact required to be stated therein or necessary in order to make the statements therein, in light of the circumstances in which they were made, not misleading, except that information filed or furnished as of a later date (but before the date of this Agreement) shall be deemed to modify information as of an earlier date. Since December 31, 2022, as of their respective dates, all Fifth Third Reports filed or furnished under the Securities Act and the Exchange Act complied in all material respects with the published rules and regulations of the SEC with respect thereto. As of the date of this Agreement, no executive officer of Fifth Third has failed in any respect to make the certifications required of him or her under Section 302 or 906 of the Sarbanes-Oxley Act. As of the date of this Agreement, there are no outstanding comments from, or unresolved issues raised by, the SEC with respect to any of the Fifth Third Reports.

5.13. Compliance with Applicable Law.

(a) Each of Fifth Third and its Subsidiaries hold, and have at all times since December 31, 2022, held, all licenses, registrations, franchises, certificates, variances, permits, charters and authorizations necessary for the lawful conduct of their respective businesses and ownership of their respective properties, rights and assets under and pursuant to each (and have paid all fees and assessments due and payable in connection therewith), except where neither the cost of failure to hold nor the cost of obtaining and holding such license, registration, franchise, certificate, variance, permit, charter or authorization (nor the failure to pay any fees or assessments) would, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third, and to the knowledge of Fifth Third, no suspension or cancellation of any such necessary license, registration, franchise, certificate, variance, permit, charter or authorization is threatened.

(b) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third, each of Fifth Third and its Subsidiaries have complied with and are not in default or violation under any applicable law, statute, order (including any Executive Order), rule, regulation, policy and/or guideline of any Governmental Entity relating to Fifth Third or any of its Subsidiaries, as applicable, including all Privacy Laws, the USA PATRIOT Act, the Bank Secrecy Act, the Equal Credit Opportunity Act and Regulation B, the Fair Housing Act, the Community Reinvestment Act, the Fair Credit Reporting Act, the Truth in Lending Act and Regulation Z, the Home Mortgage Disclosure Act, the Fair Debt Collection Practices Act, the Electronic Fund Transfer Act, the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Interagency Policy Statement on Retail Sales of Nondeposit Investment Products, the SAFE Mortgage Licensing Act of 2008, the Real Estate Settlement Procedures Act and Regulation X, Title V of the Gramm-Leach-Bliley Act, Executive Order 14,331, any and all sanctions or regulations enforced by the Office of Foreign Assets Control of the United States Department of Treasury and any other law, policy or guideline relating to bank secrecy, discriminatory lending, financing or leasing practices, consumer

protection, money laundering prevention, foreign assets control, U.S. sanctions laws and regulations, Sections 23A and 23B of the Federal Reserve Act, the Sarbanes-Oxley Act, and all agency requirements relating to the origination, sale and servicing of mortgage and consumer loans. Each of Fifth Third and its Subsidiaries have established and maintain a system of internal controls designed to ensure compliance in all material respects by Fifth Third and its Subsidiaries with applicable financial recordkeeping and reporting requirements of applicable money laundering prevention laws in jurisdictions where Fifth Third and its Subsidiaries respectively conduct business.

(c) Fifth Third Bank has a Community Reinvestment Act rating of “satisfactory” or better in its most recently completed Community Reinvestment Act examination.

(d) Without limitation, none of Fifth Third or any of its Subsidiaries, or to the knowledge of Fifth Third, any director, officer, employee, agent or other person acting on behalf of Fifth Third or any of its Subsidiaries has, directly or indirectly, (i) used any funds of Fifth Third or any of its Subsidiaries, as applicable, for unlawful contributions, unlawful gifts, unlawful entertainment or other expenses relating to political activity, (ii) made any unlawful payment to foreign or domestic governmental officials or employees or to foreign or domestic political parties or campaigns from funds of Fifth Third or any of its Subsidiaries, (iii) violated any provision that would result in the violation of the Foreign Corrupt Practices Act of 1977, as amended, or any similar law, (iv) established or maintained any unlawful fund of monies or other assets of Fifth Third or any of its Subsidiaries, (v) made any fraudulent entry on the books or records of Fifth Third or any of its Subsidiaries, (vi) made any unlawful bribe, unlawful rebate, unlawful payoff, unlawful influence payment, unlawful kickback or other unlawful payment to any person, private or public, regardless of form, whether in money, property or services, to obtain favorable treatment in securing business, to obtain special concessions for Fifth Third or any of its Subsidiaries, to pay for favorable treatment for business secured or to pay for special concessions already obtained for Fifth Third or any of its Subsidiaries, or is currently subject to any United States sanctions administered by the Office of Foreign Assets Control of the United States Treasury Department or (vii) has engaged during the past five years with any person designated by a Governmental Entity as of “primary money laundering concern,” except, in each case (i) through (vii), as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third.

(e) As of the date hereof, each of Fifth Third and Fifth Third Bank is “well-capitalized” (as such term is defined in the relevant regulations of the Federal Reserve Board).

(f) To the knowledge of Fifth Third, none of Fifth Third and Fifth Third Bank, nor any of their respective Subsidiaries, has knowingly maintained policies that require Fifth Third and Fifth Third Bank to engage in “politicized or unlawful debanking,” as such term is defined in Executive Order 14,331, or unlawful debanking on the basis of religion.

(g) Except as would not, either individually or in the aggregate, reasonably be expected to have a Material Adverse Effect on Fifth Third, (i) each of Fifth Third and its Subsidiaries have properly administered all accounts for which it acts as a fiduciary, including accounts for which it serves as a trustee, agent, custodian, personal representative, guardian,



conservator or investment advisor, in accordance with the terms of the governing documents and applicable state, federal and foreign law; and (ii) none of Fifth Third or any of its Subsidiaries or any of their respective directors, officers or employees, have committed any breach of trust or fiduciary duty with respect to any such fiduciary account, and the accountings for each such fiduciary account are true, correct and complete and accurately reflect the assets and results of such fiduciary account.

5.14. Certain Contracts.

(a) Each contract, arrangement, commitment or understanding (whether written or oral) which is a “material contract” (as such term is defined in Item 601(b)(10) of Regulation S-K of the SEC) to which Fifth Third or any of its Subsidiaries is a party or by which Fifth Third or any of its Subsidiaries is bound as of the date hereof has been filed as an exhibit to the most recent Annual Report on Form 10-K filed by Fifth Third, or a Quarterly Report on Form 10-Q or Current Report on Form 8-K subsequent thereto (each, a “Fifth Third Contract”) and neither Fifth Third nor any of its Subsidiaries knows of, or has received written, or to the knowledge of Fifth Third, oral notice of, any violation of any Fifth Third Contract by any of the other parties thereto which would reasonably be likely to have, individually or in the aggregate, a Material Adverse Effect on Fifth Third.

(b) (i) Each Fifth Third Contract is valid and binding on Fifth Third or one of its Subsidiaries, as applicable, and in full force and effect, except as, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Fifth Third, (ii) Fifth Third and each of its Subsidiaries have in all material respects complied with and performed all obligations required to be complied with or performed by any of them to date under each Fifth Third Contract, except where such noncompliance or nonperformance, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Fifth Third, (iii) to the knowledge of Fifth Third, each third-party counterparty to each Fifth Third Contract has in all material respects complied with and performed all obligations required to be complied with and performed by it to date under such Fifth Third Contract, except where such noncompliance or nonperformance, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Fifth Third, (iv) neither Fifth Third nor any of its Subsidiaries has knowledge of, or has received notice of, any violation of any Fifth Third Contract by any of the other parties thereto which would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on Fifth Third and (v) no event or condition exists which constitutes or, after notice or lapse of time or both, will constitute, a material breach or default on the part of Fifth Third or any of its Subsidiaries or, to the knowledge of Fifth Third, any other party thereto, of or under any such Fifth Third Contract, except where such breach or default, either individually or in the aggregate, would not reasonably be expected to have a Material Adverse Effect on Fifth Third.

5.15. Agreements with Regulatory Agencies. Subject to Section 10.14, none of Fifth Third or any of its Subsidiaries is subject to any cease-and-desist or other order or enforcement action issued by, or is a party to any written agreement, consent agreement or memorandum of understanding with, or is a party to any commitment letter or similar undertaking to, or is subject to any order or directive by, or has been ordered to pay any civil money penalty by, or has been since January 1, 2023, a recipient of any supervisory letter from,



or since January 1, 2023, has adopted any policies, procedures or board resolutions at the request or suggestion of, any Regulatory Agency or other Governmental Entity that currently restricts in any material respect or would reasonably be expected to restrict in any material respect the conduct of its business or that in any material manner relates to its capital adequacy, its ability to pay dividends, its credit or risk management policies, its management or its business (each, whether or not set forth in the Fifth Third Disclosure Schedule, a “Fifth Third Regulatory Agreement”), nor has Fifth Third or any of its Subsidiaries been advised in writing, or to Fifth Third’s knowledge, orally, since January 1, 2023, by any Regulatory Agency or other Governmental Entity that it is considering issuing, initiating, ordering or requesting any such Fifth Third Regulatory Agreement.

5.16. Investment Securities and Commodities. Except as would not reasonably be likely to have, individually or in the aggregate, a Material Adverse Effect on Fifth Third, each of Fifth Third and its Subsidiaries has good title in all material respects to all securities and commodities owned by it (except those sold under repurchase agreements) which are material to Fifth Third’s business on a consolidated basis, free and clear of any Lien, except to the extent such securities or commodities are pledged in the ordinary course of business to secure obligations of Fifth Third or its Subsidiaries. Such securities and commodities are valued on the books of Fifth Third in accordance with GAAP in all material respects.

5.17. Related Party Transactions.

(a) As of the date hereof, except as set forth in any Fifth Third Reports, there are no transactions or series of related transactions, agreements, arrangements or understandings, nor are there any currently proposed transactions or series of related transactions, between Fifth Third or any of its Subsidiaries, on the one hand, and any current or former director or “executive officer” (as defined in Rule 3b-7 under the Exchange Act) of Fifth Third or any of its Subsidiaries or any person who beneficially owns (as defined in Rules 13d-3 and 13d-5 of the Exchange Act) five percent (5%) or more of the outstanding Fifth Third Common Stock (or any of such person’s immediate family members or affiliates) (other than Subsidiaries of Fifth Third) on the other hand, of the type required to be reported in any Comerica Report pursuant to Item 404 of Regulation S-K promulgated under the Exchange Act.

(b) There are no outstanding Loans made by Fifth Third or any of its Subsidiaries to any “executive officer” or other “insider” (as each such term is defined in Regulation O promulgated by the Federal Reserve Board) of Fifth Third or its Subsidiaries, other than Loans that are subject to and that were made and continue to be in compliance with Regulation O or that are exempt therefrom.

5.18. State Takeover Laws. The Board of Directors of Fifth Third has approved this Agreement and the transactions contemplated hereby and has taken all such other necessary actions as required to render inapplicable to such agreements and transactions the provisions of any potentially applicable Takeover Statutes.

5.19. Reorganization. Fifth Third has not taken any action and is not aware of the existence of any fact or circumstance that could reasonably be expected to prevent or impede (i) each of the Merger or the Bank Mergers from qualifying as a “reorganization” within the

meaning of Section 368(a) of the Code or (ii) the Second Step Merger from qualifying as a “liquidation” as described in Section 332 of the Code.

5.20. Opinion. Prior to the execution of this Agreement, Goldman Sachs & Co. LLC rendered its oral opinion (to confirmed in writing by delivery of a written opinion) to the Board of Directors of Fifth Third, that as of the date of such opinion and based upon and subject to the factors and assumptions set forth therein, the Exchange Ratio pursuant to this Agreement is fair from a financial point of view to Fifth Third. Such opinion has not been amended or rescinded as of the date of this Agreement.

5.21. Fifth Third Information. The information relating to Fifth Third and its Subsidiaries or that is provided by Fifth Third or its Subsidiaries or their respective representatives for inclusion in the Joint Proxy Statement and the S-4, or in any other document filed with any Regulatory Agency or Governmental Entity in connection herewith, will not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements therein, in light of the circumstances in which they are made, not misleading. The Joint Proxy Statement (except for such portions thereof that relate only to Comerica or any of its Subsidiaries) will comply in all material respects with the provisions of the Exchange Act and the rules and regulations thereunder.

5.22. Insurance. Except as would not reasonably be expected, either individually or in the aggregate, to have a Material Adverse Effect on Fifth Third, (a) Fifth Third and its Subsidiaries are insured with reputable insurers against such risks and in such amounts as the management of Fifth Third reasonably has determined to be prudent and consistent with industry practice, and Fifth Third and its Subsidiaries are in compliance in all material respects with their insurance policies and are not in default under any of the terms thereof, (b) each such policy is outstanding and in full force and effect and, except for policies insuring against potential liabilities of current or former officers, directors and employees of Fifth Third and its Subsidiaries, Fifth Third or the relevant Subsidiary thereof is the sole beneficiary of such policies, (c) all premiums and other payments due under any such policy have been paid, and all claims thereunder have been filed in due and timely fashion, (d) there is no claim for coverage by Fifth Third or any of its Subsidiaries pending under any insurance policy as to which coverage has been questioned, denied or disputed by the underwriters of such insurance policy and (e) neither Fifth Third nor any of its Subsidiaries has received notice of any threatened termination of, material premium increase with respect to, or material alteration of coverage under, any insurance policies.

5.23. No Other Representations or Warranties.

(a) Except for the representations and warranties made by Fifth Third in this Article V, neither Fifth Third nor any other person makes any express or implied representation or warranty with respect to Fifth Third, its Subsidiaries, or their respective businesses, operations, assets, liabilities, conditions (financial or otherwise) or prospects, and Fifth Third hereby disclaims any such other representations or warranties. In particular, without limiting the foregoing disclaimer, neither Fifth Third nor any other person makes or has made any representation or warranty to Comerica or any of its affiliates or representatives with respect to (i) any financial projection, forecast, estimate, budget or prospective information relating to Fifth

Third, any of its Subsidiaries or their respective businesses or (ii) except for the representations and warranties made by Fifth Third in this Article V, any oral or written information presented to Comerica or any of its affiliates or representatives in the course of their due diligence investigation of Fifth Third, the negotiation of this Agreement or in the course of the transactions contemplated hereby.

(b) Fifth Third acknowledges and agrees that neither Comerica nor any other person on behalf of Comerica has made or is making, and Fifth Third has not relied upon, any express or implied representation or warranty other than those contained in Article IV.

## **ARTICLE VI**

### **COVENANTS RELATING TO CONDUCT OF BUSINESS**

6.1. Conduct of Businesses Prior to the Effective Time. During the period from the date of this Agreement to the Effective Time or earlier termination of this Agreement, except as expressly contemplated or permitted by this Agreement (including as set forth in the Comerica Disclosure Schedule or the Fifth Third Disclosure Schedule), required by law or as consented to in writing by the other party (such consent not to be unreasonably withheld, conditioned or delayed), each of Fifth Third and Comerica shall, and shall cause each of its respective Subsidiaries to, (a) conduct its business in the ordinary course in all material respects, (b) use reasonable best efforts to maintain and preserve intact its business organization, employees and advantageous business relationships, and (c) take no action that would reasonably be expected to adversely affect or delay the ability of either Fifth Third or Comerica to obtain any necessary approvals of any Regulatory Agency or other Governmental Entity required for the transactions contemplated hereby or to perform its covenants and agreements under this Agreement or to consummate the transactions contemplated hereby on a timely basis.

6.2. Comerica Forbearances. During the period from the date of this Agreement to the Effective Time or earlier termination of this Agreement, except as set forth in the Comerica Disclosure Schedule as expressly contemplated or permitted by this Agreement or as required by law, Comerica shall not, and shall not permit any of its Subsidiaries to, without the prior written consent of Fifth Third (such consent not to be unreasonably withheld, conditioned or delayed):

(a) other than (i) federal funds borrowings and Federal Home Loan Bank borrowings, in each case with a maturity not in excess of twelve (12) months, and (ii) deposits, in each case in the ordinary course of business, incur any indebtedness for borrowed money (other than indebtedness of Comerica or any of its wholly-owned Subsidiaries to Comerica or any of its wholly-owned Subsidiaries), or assume, guarantee, endorse or otherwise as an accommodation become responsible for the obligations of any other individual, corporation or other entity;

(b) (i) adjust, split, combine or reclassify any capital stock;

(ii) make, declare, pay or set a record date for any dividend, or any other distribution on, or directly or indirectly redeem, purchase or otherwise acquire, any shares of its capital stock or other equity or voting securities or any securities or obligations convertible (whether currently convertible or convertible only after the passage of time or the occurrence of

certain events) or exchangeable into or exercisable for any shares of its capital stock or other equity or voting securities, including any Comerica Securities, except, in each case, (A) regular quarterly cash dividends by Comerica at a rate not in excess of \$0.71 per share of Comerica Common Stock, (B) dividends paid by any of the Subsidiaries of Comerica to Comerica or any of its wholly-owned Subsidiaries, (C) dividends provided for and paid on Comerica Preferred Stock in accordance with the terms of such Comerica Preferred Stock, (D) regular distributions on outstanding trust preferred securities in accordance with their terms or (E) the acceptance of shares of Comerica Common Stock as payment for the exercise price of stock options or for withholding Taxes incurred in connection with the exercise of stock options or the vesting or settlement of equity compensation awards, in each case, in accordance with past practice and the terms of the applicable award agreements;

(iii) grant any stock options, stock appreciation rights, performance shares, restricted stock units, performance stock units, phantom stock units, restricted shares or other equity-based awards or interests, or grant any person any right to acquire any Comerica Securities or Comerica Subsidiary Securities; or

(iv) issue, sell, transfer, encumber or otherwise permit to become outstanding any shares of capital stock or voting securities or equity interests or securities convertible (whether currently convertible or convertible only after the passage of time of the occurrence of certain events) or exchangeable into, or exercisable for, any shares of its capital stock or other equity or voting securities, including any Comerica Securities or Comerica Subsidiary Securities, or any options, warrants, or other rights of any kind to acquire any shares of capital stock or other equity or voting securities, including any Comerica Securities or Comerica Subsidiary Securities, except pursuant to the exercise of stock options or the vesting or settlement of any Comerica Equity Awards in accordance with their terms;

(c) sell, transfer, mortgage, encumber or otherwise dispose of any of its material properties or assets (other than Intellectual Property, which is the subject of Section 6.2(d)) to any individual, corporation or other entity other than a wholly-owned Subsidiary, or cancel, release or assign any indebtedness to any such person or any claims held by any such person, in each case other than in the ordinary course of business or pursuant to contracts or agreements in force at the date of this Agreement;

(d) sell, transfer, mortgage, encumber, license, abandon, cancel, allow to lapse or expire, or otherwise dispose of, any of its material Intellectual Property other than, in each case, (i) non-exclusive licenses granted in the ordinary course of business, or (ii) expiration or lapse at the end of such Intellectual Property's natural term;

(e) except for foreclosure or acquisitions of control in a fiduciary or similar capacity or in satisfaction of debts previously contracted in good faith in the ordinary course of business, make any material investment in or acquisition of (whether by purchase of stock or securities, contributions to capital, property transfers, merger or consolidation, or formation of a joint venture or otherwise) any other person or the property or assets of any other person, in each case, other than a wholly-owned Subsidiary of Comerica;

(f) in each case except for transactions in the ordinary course of business, terminate, materially amend, or waive any material provision of, any Comerica Contract or make any change in any instrument or agreement governing the terms of any of its securities, other than normal renewals of contracts without material adverse changes of terms with respect to Comerica or enter into any contract that would constitute a Comerica Contract if it were in effect on the date of this Agreement;

(g) except as required under applicable law or the terms of any Comerica Benefit Plan existing as of the date hereof or adopted thereafter not in violation of this Agreement, (i) enter into, establish, adopt, materially amend or terminate any material Comerica Benefit Plan, or any arrangement that would be a material Comerica Benefit Plan if in effect on the date hereof, other than with respect to broad-base welfare benefit plans (other than severance) in the ordinary course of business consistent with past practice and as would not reasonably be expected to materially increase the cost of benefits under any Comerica Benefit Plan, (ii) increase the compensation or benefits payable to any current or former employee, officer, director or individual consultant, other than increases to current employees and officers who are not Comerica Insiders (x) in connection with a promotion or change in responsibilities and to a level consistent with the compensation and benefits provided to similarly situated employees in the ordinary course of business or (y) in the ordinary course of business consistent with past practice or (z) as a result of the payment of incentive compensation for completed performance periods based upon corporate performance, the performance of such employee and, if applicable, such employee's business, where performance is determined in the ordinary course of business and consistent with past practice (iii) accelerate the vesting of any equity-based awards or other compensation or benefits, (iv) enter into any new, or amend any existing, employment, severance, change in control, retention, collective bargaining agreement or similar agreement or arrangement; *provided* that Comerica may enter into offer letters with new hires in the ordinary course of business consistent with past practice that do not provide for severance, (v) fund any rabbi trust or similar arrangement or in any other way secure the payment of compensation or benefits under any Comerica Benefit Plan or (vi) hire any Comerica Insider (other than as a replacement hire receiving substantially similar terms of employment);

(h) settle any material claim, suit, action or proceeding (other than any claim, suit, action or proceeding with respect to Taxes, which shall be governed by clause (o)), except involving solely monetary remedies in an amount, individually and in the aggregate, that is not material to Comerica, and that would not impose any material restriction on, or create any adverse precedent that would be material to, the business of it or its Subsidiaries or Fifth Third or the Surviving Entity;

(i) take any action or knowingly fail to take any action where such action or failure to act could reasonably be expected to prevent (i) each of the Merger and the Bank Mergers from qualifying as a "reorganization" within the meaning of Section 368(a) of the Code or (ii) the Second Step Merger from qualifying as a "liquidation" as described in Section 332 of the Code;

(j) amend its articles of incorporation, its bylaws or comparable governing documents of its Subsidiaries that are "significant subsidiaries" within the meaning of Rule 1-02 of Regulation S-X of the SEC ("Significant Subsidiaries");



(k) other than in prior consultation with Fifth Third, materially restructure or materially change its investment securities or derivatives portfolio or its interest rate exposure, through purchases, sales or otherwise, or the manner in which the portfolio is classified or reported;

(l) implement or adopt any change in its financial accounting principles or methods, other than as may be required by GAAP;

(m) enter into any new line of business or, other than in the ordinary course of business (which may include partnering with third parties in origination, flow, servicing and other capacities) consistent with past practice, change in any material respect its lending, investment, underwriting, risk and asset liability management and other banking and operating, securitization and servicing policies (including any change in the maximum ratio or similar limits as a percentage of its capital exposure applicable with respect to its loan portfolio, any segment thereof or individual loans), except as required by applicable law, regulation or policies imposed by any Governmental Entity;

(n) merge or consolidate itself or any of its Significant Subsidiaries with any other person, or restructure, reorganize or completely or partially liquidate or dissolve it or any of its Significant Subsidiaries;

(o) make (other than in the ordinary course of business), change or revoke any material Tax election, change an annual Tax accounting period, adopt or change any material Tax accounting method, file any material amended Tax Return, enter into any closing agreement or similar agreement with a Tax authority with respect to a material amount of Taxes, or settle any material Tax claim, audit, assessment or dispute or surrender any material right to claim a refund of Taxes; or

(p) agree to take, make any commitment to take, or adopt any resolutions of its Board of Directors or similar governing body in support of, any of the actions prohibited by this Section 6.2.

6.3. Fifth Third Forbearances. During the period from the date of this Agreement to the Effective Time or earlier termination of this Agreement, except as set forth in the Fifth Third Disclosure Schedule, as expressly contemplated or permitted by this Agreement or as required by law, Fifth Third shall not, and shall not permit any of its Subsidiaries to, without the prior written consent of Comerica (such consent not to be unreasonably withheld, conditioned or delayed):

(a) amend the Fifth Third Articles or the Fifth Third Code of Regulations in a manner that would adversely affect the holders of Comerica Common Stock or Comerica Preferred Stock relative to other holders of Fifth Third Common Stock or Fifth Third Preferred Stock (as applicable);



(b) adjust, split, combine or reclassify any capital stock of Fifth Third or make, declare or pay any extraordinary dividend on any capital stock of Fifth Third;

(c) take any action or knowingly fail to take any action where such action or failure to act could reasonably be expected to prevent (i) each of the Merger and the Bank Mergers from qualifying as a “reorganization” within the meaning of Section 368(a) of the Code or (ii) the Second Step Merger from qualifying as a “liquidation” as described in Section 332 of the Code;

(d) knowingly take any action that is intended to or would reasonably be likely to adversely affect or materially delay the ability of Fifth Third or its Subsidiaries to obtain any necessary approvals of any Regulatory Agency or Governmental Entity required for the transactions contemplated hereby or by the Bank Merger Agreement or the Requisite Fifth Third Vote or to perform its covenants and agreements under this Agreement or the Bank Merger Agreement or to consummate the transactions contemplated hereby or thereby; or

(e) agree to take, make any commitment to take, or adopt any resolutions of its Board of Directors or similar governing body in support of, any of the actions prohibited by this Section 6.3.

## **ARTICLE VII**

### **ADDITIONAL AGREEMENTS**

#### **7.1. S-4; Joint Proxy Statement; Regulatory Applications and Filings.**

(a) Fifth Third and Comerica shall promptly prepare and file with the SEC the Joint Proxy Statement and Fifth Third shall promptly prepare and file with the SEC the S-4, in which the Joint Proxy Statement will be included as a prospectus. Fifth Third and Comerica, as applicable, shall use reasonable best efforts to make such filings within forty-five (45) days of the date of this Agreement. Each of Fifth Third and Comerica shall use their reasonable best efforts to have the S-4 declared effective under the Securities Act as promptly as practicable after such filing and to keep the S-4 effective for so long as necessary to consummate the transactions contemplated by this Agreement, and Comerica and Fifth Third shall thereafter mail or deliver the Joint Proxy Statement to its stockholders or shareholders, as applicable. Fifth Third shall also use its reasonable best efforts to obtain all necessary state securities law or “Blue Sky” permits and approvals required to carry out the transactions contemplated by this Agreement as promptly as practicable, and Comerica shall furnish all information concerning Comerica and the holders of Comerica Common Stock and Comerica Preferred Stock as may be reasonably requested in connection with any such action.

(b) The parties shall cooperate with each other and use their reasonable best efforts to promptly prepare and file all necessary documentation, to effect all applications, notices, petitions and filings (and in the case of the applications, notices, petitions and filings required to obtain the Requisite Regulatory Approvals, use their reasonable best efforts to make such filings within thirty (30) days of the date of this Agreement), to obtain as promptly as practicable all permits, consents, approvals and authorizations of all third parties, Regulatory Agencies and Governmental Entities which are necessary or advisable to consummate the

transactions contemplated by this Agreement (including the Mergers and the Bank Merger), and to comply with the terms and conditions of all such permits, consents, approvals and authorizations of all such third parties and Governmental Entities. Fifth Third and Comerica shall each use, and shall each cause their applicable Subsidiaries to use, reasonable best efforts to obtain each such Requisite Regulatory Approval and any approvals required for the Bank Mergers as promptly as reasonably practicable. The parties shall cooperate with each other in connection therewith (including the furnishing of any information and any reasonable undertaking or commitments that may be required to obtain the Requisite Regulatory Approvals) and shall respond as promptly as practicable to the requests of Governmental Entities for documents and information. Fifth Third and Comerica shall have the right to review in advance, and, to the extent practicable, each will consult the other on, in each case subject to applicable laws relating to the exchange of information, all the information relating to Comerica or Fifth Third, as the case may be, and any of their respective Subsidiaries, which appears in any filing made with, or written materials submitted to, any third party or any Governmental Entity in connection with the transactions contemplated by this Agreement. In exercising the foregoing right, each of the parties hereto shall act reasonably and as promptly as practicable. Each party will provide the other with copies of any applications and all correspondence relating thereto prior to filing and with sufficient opportunity to comment, other than any portions of material filed in connection therewith that contain competitively sensitive business or other proprietary information or confidential supervisory information filed under a claim of confidentiality. The parties agree that they will consult with each other with respect to the obtaining of all permits, consents, approvals and authorizations of all third parties, Regulatory Agencies and Governmental Entities necessary or advisable to consummate the transactions contemplated by this Agreement and each party will keep the other apprised of the status of matters relating to completion of the transactions contemplated herein.

(c) In furtherance and not in limitation of the foregoing, each of Fifth Third and Comerica shall use its reasonable best efforts to avoid the entry of, or to have vacated, lifted, reversed or overturned any decree, judgment, injunction or other order, whether temporary, preliminary or permanent, that would restrain, prevent or delay the Closing. Notwithstanding the foregoing, nothing contained herein shall be deemed to require Fifth Third or Comerica or any of their respective Subsidiaries, and neither Fifth Third nor Comerica nor any of their respective Subsidiaries shall be permitted (without the written consent of the other party), to take any action, or commit to take any action, or agree to any condition or restriction, in connection with the foregoing or obtaining any permits, consents, approvals and authorizations of Governmental Entities that would reasonably be likely to have a material adverse effect on Comerica and its Subsidiaries, taken as a whole (a “Materially Burdensome Regulatory Condition”).

(d) Fifth Third and Comerica shall, upon request, furnish each other with all information concerning themselves, their Subsidiaries, directors, officers and stockholders or shareholders, as applicable, and such other matters as may be reasonably necessary or advisable in connection with the Proxy Statement, the S-4 or any other statement, filing, notice or application made by or on behalf of Fifth Third, Comerica or any of their respective Subsidiaries to any Governmental Entity in connection with the Mergers, the Bank Mergers and the other transactions contemplated by this Agreement. Each of Fifth Third and Comerica agrees, as to itself and its Subsidiaries, that none of the information supplied or to be supplied by it specifically for inclusion or incorporation by reference in (i) the S-4 will, at the time the S-4 and

each amendment or supplement thereto, if any, is filed and becomes effective under the Securities Act, contain any untrue statement of a material fact or omit to state any material fact required to be stated therein or necessary to make the statements therein not misleading, (ii) the Proxy Statement and any amendment or supplement thereto will, at the time of filing and the date of mailing to the stockholders or shareholders, as applicable, of Comerica and Fifth Third and at the time of the Comerica Meeting and Fifth Third Meeting, contain any untrue statement of a material fact or omit to state any material fact required to be stated therein or necessary to make the statements therein, in the light of the circumstances under which such statement was made, not misleading, and (iii) any applications, notices and filings required in order to obtain the Requisite Regulatory Approvals will, at the time each is filed, contain any untrue statement of a material fact or omit to state any material fact required to be stated therein or necessary to make the statements therein not misleading. Each of Fifth Third and Comerica further agrees that if it becomes aware that any information furnished by it would cause any of the statements in the S-4 or the Proxy Statement to be false or misleading with respect to any material fact, or to omit to state any material fact necessary to make the statements therein not false or misleading, to promptly inform the other party thereof and to take appropriate steps to correct the S-4 or the Proxy Statement.

(e) Fifth Third and Comerica shall promptly advise each other upon receiving any communication from any Governmental Entity whose consent or approval is required for consummation of the transactions contemplated by this Agreement that causes such party to believe that there is a reasonable likelihood that any Requisite Regulatory Approval will not be obtained or that the receipt of any such approval will be materially delayed.

(f) Without limiting the generality of this Section 7.1, Comerica shall, and shall cause its Subsidiaries to, reasonably cooperate with Fifth Third and its Subsidiaries (including the furnishing of information and by making employees reasonably available) as is reasonably requested by Fifth Third in order to comply with the requirements of the Comprehensive Capital Analysis and Review and Dodd-Frank Act Stress Testing programs.

## 7.2. Access to Information; Confidentiality.

(a) Upon reasonable notice and subject to applicable laws, each party, for the purposes of verifying the representations and warranties of Fifth Third and Comerica, respectively, and preparing for the Mergers, the Bank Mergers and the other matters contemplated by this Agreement, shall, and Fifth Third and Comerica shall cause each of their respective Subsidiaries to, afford to the officers, employees, accountants, counsel, advisors and other representatives of the other party, access, during normal business hours during the period prior to the Effective Time, to all its properties, books, contracts, commitments, personnel, information technology systems, and records, and each party shall cooperate with each other party in preparing to execute after the Effective Time the conversion or consolidation of data, systems and business operations generally and in preparing for compliance with the regulatory requirements that will apply to Fifth Third and Fifth Third Bank following the Effective Time, which cooperation and preparations will include the assessment by Fifth Third after the date hereof of the information technology systems of Comerica and its Subsidiaries, and, during such period, each of Fifth Third and Comerica shall, and shall cause its respective Subsidiaries to, make available to the other party (i) a copy of each report, schedule, registration statement and

other document filed or received by it during such period pursuant to the requirements of federal securities laws or federal or state banking laws (other than reports or documents that Fifth Third or Comerica, as the case may be, is not permitted to disclose under applicable law), and (ii) all other information concerning its business, properties and personnel as such party may reasonably request. Neither Fifth Third nor Comerica nor any of their respective Subsidiaries shall be required to provide access to or to disclose information where such access or disclosure would violate or prejudice the rights of Fifth Third's or Comerica's, as the case may be, customers, jeopardize the attorney-client privilege of the institution in possession or control of such information (after giving due consideration to the existence of any common interest, joint defense or similar agreement between the parties) or contravene any law, rule, regulation, order, judgment, decree, fiduciary duty or binding agreement entered into prior to the date of this Agreement. The parties hereto will make appropriate substitute disclosure arrangements under circumstances in which the restrictions of the preceding sentence apply.

(b) Each party shall hold all information furnished by or on behalf of each other party or any of such party's Subsidiaries or representatives pursuant to Section 7.2(a) in confidence to the extent required by, and in accordance with, the provisions of the letter agreement, dated September 24, 2025, between Fifth Third and Comerica (the "Confidentiality Agreement").

(c) No investigation by either of the parties or their respective representatives shall affect or be deemed to modify or waive the representations and warranties of the other set forth herein. Nothing contained in this Agreement shall give any party, directly or indirectly, the right to control or direct the operations of the other party prior to the Effective Time. Prior to the Effective Time, each party shall exercise, consistent with the terms and conditions of this Agreement, complete control and supervision over its and its Subsidiaries' respective operations.

7.3. Shareholders' Approvals. Each of Fifth Third and Comerica shall call a meeting of its shareholders or stockholders, as applicable (the "Fifth Third Meeting" and the "Comerica Meeting," respectively), to be held as soon as reasonably practicable after the S-4 is declared effective, for the purpose of obtaining (a) the Requisite Comerica Vote and the Requisite Fifth Third Vote required in connection with this Agreement and the Merger and (b) if so desired and mutually agreed, a vote upon other matters of the type customarily brought before a meeting of shareholders or stockholders in connection with the approval of a merger agreement or the transactions contemplated thereby, and each of Comerica and Fifth Third shall use its reasonable best efforts to cause such meetings to occur as soon as reasonably practicable and on the same date and to set the same record date for such meetings. Such meetings may be held virtually, subject to applicable law and the Organizational Documents of each party. Each of Fifth Third and Comerica and their respective Boards of Directors shall use its reasonable best efforts to obtain from the shareholders or stockholders of Fifth Third and Comerica, as applicable, the Requisite Fifth Third Vote and the Requisite Comerica Vote, as applicable, including by communicating to the respective shareholders or stockholders of Fifth Third and Comerica, as applicable, its recommendation (and including such recommendation in the Joint Proxy Statement) that, in the case of Fifth Third, the shareholders of Fifth Third approve the Stock Issuance (the "Fifth Third Board Recommendation"), and in the case of Comerica, that the stockholders of Comerica adopt this Agreement (the "Comerica Board Recommendation"). Each of Fifth Third and Comerica and their respective Boards of Directors shall not (i) withhold,

withdraw, modify or qualify in a manner adverse to the other party the Fifth Third Board Recommendation, in the case of Fifth Third, or the Comerica Board Recommendation, in the case of Comerica, (ii) fail to make the Fifth Third Board Recommendation, in the case of Fifth Third, or the Comerica Board Recommendation, in the case of Comerica, in the Joint Proxy Statement, (iii) adopt, approve, recommend or endorse an Acquisition Proposal or publicly announce an intention to adopt, approve, recommend or endorse an Acquisition Proposal, (iv) fail to publicly and without qualification (A) recommend against any Acquisition Proposal or (B) reaffirm the Fifth Third Board Recommendation, in the case of Fifth Third, or the Comerica Board Recommendation, in the case of Comerica, in each case within ten (10) business days (or such fewer number of days as remains prior to the Fifth Third Meeting or the Comerica Meeting, as applicable) after an Acquisition Proposal is made public or any request by the other party to do so, or (v) publicly propose to do any of the foregoing (any of the foregoing a “Recommendation Change”). However, subject to Section 9.1 and Section 9.2, if the Board of Directors of Fifth Third or Comerica, after receiving the advice of its outside counsel and, with respect to financial matters, its financial advisors, determines in good faith that it would more likely than not result in a violation of its fiduciary duties under applicable law to make or continue to make the Fifth Third Board Recommendation or the Comerica Board Recommendation, as applicable, such Board of Directors may, in the case of Fifth Third, prior to the receipt of the Requisite Fifth Third Vote, and in the case of Comerica, prior to the receipt of the Requisite Comerica Vote, submit this Agreement to its shareholders or stockholders, as applicable, without recommendation (although the resolutions approving this Agreement as of the date hereof may not be rescinded or amended), in which event such Board of Directors may communicate the basis for its lack of a recommendation to its shareholders or stockholders, as applicable, in the Joint Proxy Statement or an appropriate amendment or supplement thereto to the extent required by law; provided that such Board of Directors may not take any actions under this sentence unless it (A) gives the other party at least three (3) business days’ prior written notice of its intention to take such action and a reasonable description of the event or circumstances giving rise to its determination to take such action (including, in the event such action is taken in response to an Acquisition Proposal, the latest material terms and conditions of, and the identity of the third party making, any such Acquisition Proposal, or any amendment or modification thereof, or describe in reasonable detail such other event or circumstances) and (B) at the end of such notice period, takes into account any amendment or modification to this Agreement proposed by the other party and, after receiving the advice of its outside counsel and, with respect to financial matters, its financial advisors, determines in good faith that it would nevertheless more likely than not result in a violation of its fiduciary duties under applicable law to make or continue to make the Fifth Third Board Recommendation or Comerica Board Recommendation, as the case may be. Any material amendment to any Acquisition Proposal will be deemed to be a new Acquisition Proposal for purposes of this Section 7.3 and will require a new notice period as referred to in this Section 7.3. Fifth Third or Comerica shall adjourn or postpone the Fifth Third Meeting or the Comerica Meeting, as the case may be, if, as of the time for which such meeting is originally scheduled there are insufficient shares of Fifth Third Common Stock or Comerica Common Stock, as the case may be, represented (either in person or by proxy) to constitute a quorum necessary to conduct the business of such meeting, or if on the date of such meeting Comerica or Fifth Third, as applicable, has not received proxies representing a sufficient number of shares necessary to obtain the Requisite Comerica Vote or the Requisite Fifth Third Vote. Notwithstanding anything to the contrary herein, unless this



Agreement has been terminated in accordance with its terms, (x) the Fifth Third Meeting shall be convened and this Agreement shall be submitted to the shareholders of Fifth Third at the Fifth Third Meeting and (y) the Comerica Meeting shall be convened and this Agreement shall be submitted to the stockholders of Comerica at the Comerica Meeting, and nothing contained herein shall be deemed to relieve either Fifth Third or Comerica of such obligation. For the avoidance of doubt, the holders of Fifth Third Series A, Class B Preferred Stock shall be entitled to vote at the Fifth Third Meeting and shall be considered shareholders for purposes of such meeting.

7.4. Legal Conditions to Merger. Subject in all respects to Section 7.1 of this Agreement, each party shall, and Fifth Third and Comerica shall cause each of their respective Subsidiaries to, use their reasonable best efforts (a) to take, or cause to be taken, all actions necessary, proper or advisable to comply promptly with all legal requirements that may be imposed on such party or its Subsidiaries with respect to the Mergers and the Bank Mergers and, subject to the conditions set forth in Article VIII hereof, to consummate the transactions contemplated by this Agreement, including the Mergers and the Bank Merger, and (b) to obtain (and to cooperate with each other party to obtain) any material consent, authorization, order or approval of, or any exemption by, any Regulatory Agency, Governmental Entity and any other third party that is required to be obtained by Comerica or Fifth Third or any of their respective Subsidiaries in connection with the Mergers, the Bank Mergers and the other transactions contemplated by this Agreement.

7.5. Employee Matters.

(a) Fifth Third shall, or shall cause its applicable Subsidiary to, provide the employees of Comerica and its Subsidiaries as of the Effective Time (the “Continuing Employees”), (A) during the period commencing on the Closing Date and ending on the earlier of December 31 of the calendar year in which the Closing Date occurs and the Continuing Employee’s termination of employment, with the following: (i) annual base salary or wages, as applicable, that are no less than the annual base salary or wages in effect for each such Continuing Employee immediately prior to the Effective Time; (ii) annual cash bonus opportunities that are no less favorable than those in effect for such Continuing Employee immediately prior to the Effective Time; (iii) annual long-term incentive opportunities that are no less favorable than those in effect for such Continuing Employee immediately prior to the Effective Time; and (iv) employee and fringe benefits (excluding severance (which shall be provided consistent with the last sentence hereof) and retention) that are no less favorable in the aggregate than those provided to such Continuing Employee immediately prior to the Effective Time and (B) during the period commencing on January 1 of the calendar year following the calendar year in which the Closing Date occurs and ending on the earlier of the first anniversary of the Closing Date and the Continuing Employee’s termination of employment, with the following: (i) annual base salary or wages, as applicable, that are no less than the annual base salary or wages in effect for each such Continuing Employee immediately prior to the Effective Time; (ii) annual cash bonus opportunities that are no less favorable than those provided to similarly situated employees of Fifth Third; (iii) annual long-term incentive opportunities that are no less favorable than those provided to similarly situated employees of Fifth Third; and (iv) employee and fringe benefits (excluding severance solely during the period through the first anniversary of the Closing Date (which shall be provided consistent with the last sentence



hereof) and retention) that are no less favorable in the aggregate than those provided to similarly situated employees of Fifth Third. Additionally, notwithstanding anything contained herein to the contrary, Fifth Third agrees to maintain the Comerica Severance Pay Plan (as in effect on the date hereof) for the benefit of the Continuing Employees through the first anniversary of the Closing Date, with the benefits provided thereunder to be determined taking into account the service crediting provisions set forth in Section 7.5(b) and all service from and after the Effective Time and not to taking into account any reductions of compensation from and after the Effective Time.

(b) Fifth Third shall, or shall cause its applicable Subsidiary to, (i) cause any pre-existing conditions or limitations and eligibility waiting periods under any group health plans of Fifth Third or its Affiliates to be waived with respect to the Continuing Employees and their eligible dependents except to the extent that any waiting period, exclusions or requirements still applied to such Continuing Employee under the corresponding Comerica Benefit Plan that is a group health plan in which such Continuing Employee participated immediately before the Effective Time, (ii) use commercially reasonable efforts to cause the amount of eligible expenses incurred and paid by each Continuing Employee and his or her eligible dependents that were credited to deductible and maximum out-of-pocket co-insurance requirements under the Comerica Benefit Plans to be credited for purposes of satisfying the corresponding deductible and maximum out-of-pocket co-insurance requirements under the corresponding benefit plans of Fifth Third and its Affiliates and (iii) cause any of its (or its Affiliates') employee benefit plans (including disability pay continuation plans) in which the Continuing Employees are entitled to participate to take into account for purposes of eligibility to participate, vesting and benefit accrual thereunder (except to the extent it would result in a duplication of benefits for the same period of service), service by such Continuing Employees to Comerica or any of its Affiliates or predecessors prior to the Effective Time as if such service were with Fifth Third, to the same extent and for the same purpose that such service was recognized under a comparable Comerica Benefit Plan.

(c) Fifth Third hereby agrees that the transactions contemplated by this Agreement shall constitute a "change in control," "change of control" or term or concept of similar import of Comerica and its Subsidiaries under the terms of the Comerica Benefit Plans. From and after the Effective Time, Fifth Third shall, and shall cause its Affiliates to, honor all obligations and rights under the Comerica Benefit Plans in accordance with their terms as in effect in connection with any such transaction from time to time; provided that nothing herein will limit any right to amend, modify or terminate any such arrangement in accordance with its terms. Without limiting the foregoing, Fifth Third acknowledges and agrees to the matters set forth on Section 7.5(c) of the Comerica Disclosure Schedule.

(d) If requested by Fifth Third in writing at least ten (10) business days prior to the Effective Time, to the extent permitted by applicable Law and the terms of the applicable plan or arrangement, Comerica shall cause the Comerica 401(k) Plan to be terminated effective immediately prior to the Effective Time. In the event that Fifth Third requests any such actions, Comerica shall provide Fifth Third with evidence that such Plan has been terminated or amended, as applicable (the form and substance of which shall be subject to review and approval by Fifth Third), not later than the second business day immediately preceding the Effective Time. In the event that the Comerica 401(k) Plan is terminated, the Continuing Employees shall

be eligible to participate, effective as soon as reasonably practicable (and not more than thirty (30) days) after the Effective Time, in a 401(k) plan sponsored or maintained by Fifth Third or one of its Subsidiaries (a “Fifth Third 401(k) Plan”). Fifth Third and Comerica shall take any and all actions as may be required, including amendments to the Comerica 401(k) Plan and/or Fifth Third 401(k) Plan to permit the Continuing Employees who are then actively employed to make rollover contributions to the Fifth Third 401(k) Plan of “eligible rollover distributions” (with the meaning of Section 401(a)(31) of the Code) in the form of cash, notes (in the case of loans) or a combination thereof.

(e) Nothing in this Agreement shall confer upon any employee (including any Continuing Employee), officer, director or consultant of Fifth Third, Comerica or any of their respective Subsidiaries or affiliates any right to continue in the employ or service of the Surviving Entity, Fifth Third, Comerica or any Subsidiary or affiliate thereof, or shall interfere with or restrict in any way the rights of the Surviving Entity, Fifth Third, Comerica or any Subsidiary or affiliate thereof to discharge or terminate the services of any employee (including any Continuing Employee), officer, director or consultant of the Surviving Entity, Fifth Third, Comerica or any of their respective Subsidiaries or affiliates at any time for any reason whatsoever, with or without cause. Nothing in this Agreement shall be deemed to (i) establish, amend, or modify any Fifth Third Benefit Plan, Comerica Benefit Plan or any other benefit or employment plan, program, agreement or arrangement, or (ii) alter or limit the ability of the Surviving Entity or any of its Subsidiaries or affiliates to amend, modify or terminate any particular Fifth Third Benefit Plan, Comerica Benefit Plan or any other benefit or employment plan, program, agreement or arrangement after the Effective Time. Without limiting the generality of Section 10.11, nothing in this Agreement, express or implied, is intended to or shall confer upon any person, including, any current or former employee, officer, director or consultant of Fifth Third, Comerica or any of their respective Subsidiaries or affiliates or any beneficiary or dependent thereof, any right, benefit or remedy of any nature whatsoever under or by reason of this Agreement.

#### 7.6. Certain Tax Matters.

(a) Neither Fifth Third nor Comerica shall, nor shall they permit their respective Subsidiaries to, take any action that would prevent or impede, or could reasonably be expected to prevent or impede, (i) each of the Merger and the Bank Mergers from qualifying as a “reorganization” within the meaning of Section 368(a) of the Code or (ii) the Second Step Merger from qualifying as a “liquidation” as described in Section 332 of the Code, and each of Fifth Third and Comerica shall, and shall cause their respective Subsidiaries to, use its reasonable best efforts to cause the Mergers and the Bank Mergers to so qualify.

(b) Fifth Third shall use reasonable best efforts to obtain the Fifth Third Tax Opinion, and Comerica shall use reasonable best efforts to obtain the Comerica Tax Opinion (and, if the SEC requires any opinion regarding the U.S. federal income tax treatment of the Merger to be submitted in connection with the declaration of the effectiveness of the S-4, such opinions). In connection with the foregoing, each party shall deliver duly executed certificates (dated as of the necessary date and signed by an officer of Fifth Third, Fifth Third Intermediary or Comerica, as applicable) containing such representations and warranties as shall be reasonably satisfactory in form and substance to Fifth Third’s counsel and Comerica’s counsel and

reasonably necessary or appropriate to enable such counsel to render such opinions (but only to the extent Fifth Third and Comerica in good faith believe they are able to make such representations and warranties truthfully).

7.7. Indemnification; Directors' and Officers' Insurance.

(a) From and after the Effective Time, Fifth Third shall indemnify and hold harmless and shall advance expenses as incurred, in each case to the extent (subject to applicable law) such persons are indemnified as of the date of this Agreement by Comerica pursuant to the Comerica Charter, the Comerica Bylaws, the Organizational Documents of any Subsidiary of Comerica and any indemnification agreements in existence as of the date hereof and disclosed in Section 7.7(a) of the Comerica Disclosure Schedule, each present and former director, officer or employee of Comerica and its Subsidiaries (in each case, when acting in such capacity) (each, a "Indemnified Party") against any costs or expenses (including reasonable attorneys' fees), judgments, fines, losses, damages or liabilities incurred in connection with any threatened or actual claim, action, suit, proceeding or investigation, whether civil, criminal, administrative or investigative, whether arising before or after the Effective Time, arising out of the fact that such person is or was a director, officer or employee of Comerica or any of its Subsidiaries and pertaining to matters existing or occurring at or prior to the Effective Time, including the transactions contemplated by this Agreement; provided, that in the case of advancement of expenses, any Indemnified Party to whom expenses are advanced provides an undertaking to repay such advances if it is ultimately determined that such Indemnified Party is not entitled to indemnification.

(b) For a period of six (6) years after the Effective Time, Fifth Third shall cause to be maintained in effect the current policies of directors' and officers' liability insurance maintained by Comerica (provided, that Fifth Third may substitute therefor policies with a substantially comparable insurer of at least the same coverage and amounts containing terms and conditions that are no less advantageous to the insured) with respect to claims arising from facts or events which occurred at or before the Effective Time; provided, however, that Fifth Third shall not be obligated to expend, on an annual basis, an amount in excess of 300% of the current annual premium paid as of the date hereof by Comerica for such insurance (the "Premium Cap"), and if such premiums for such insurance would at any time exceed the Premium Cap, then Fifth Third shall cause to be maintained policies of insurance which, in Fifth Third's good faith determination, provide the maximum coverage available at an annual premium equal to the Premium Cap. In lieu of the foregoing, Fifth Third, in consultation with, but only upon the consent of Comerica, may obtain at or prior to the Effective Time a six (6)-year "tail" policy under Comerica's existing directors' and officers' insurance policy providing equivalent coverage to that described in the preceding sentence if and to the extent that the same may be obtained for an amount that, in the aggregate, does not exceed the Premium Cap.

(c) The provisions of this Section 7.7 shall survive the Effective Time and are intended to be for the benefit of, and shall be enforceable by, each Indemnified Party and his or her heirs and representatives. If Fifth Third or any of its successors or assigns (i) consolidates with or merges into any other person and is not the continuing or surviving entity of such consolidation or merger, or (ii) transfers all or substantially all its assets or deposits to any other person or engages in any similar transaction, then in each such case, Fifth Third will cause

proper provision to be made so that the successors and assigns of Fifth Third will expressly assume the obligations set forth in this Section 7.7.

7.8. Additional Agreements. In case at any time after the Effective Time any further action is necessary or desirable to carry out the purposes of this Agreement (including any merger between a Subsidiary of Fifth Third, on the one hand, and a Subsidiary of Comerica, on the other hand) or to vest the Surviving Corporation with full title to all properties, assets, rights, approvals, immunities and franchises of any of the parties to the Mergers or the Bank Merger, the proper officers and directors of each party to this Agreement and their respective Subsidiaries shall take all such necessary action as may be reasonably requested by Fifth Third.

7.9. Advice of Changes. Each party shall promptly advise each other party, as applicable, of any effect, change, event, circumstance, condition, occurrence or development (i) that has had or would reasonably be expected to have, either individually or in the aggregate, a Material Adverse Effect on it or (ii) that Fifth Third or Comerica believes would or would reasonably be expected to cause or constitute a material breach of any of its representations, warranties, obligations, covenants or agreements contained herein that reasonably could be expected to give rise, individually or in the aggregate, to the failure of a condition in Article VIII; provided, that any failure to give notice in accordance with the foregoing with respect to any breach shall not be deemed to constitute a violation of this Section 7.9 or the failure of any condition set forth in Section 8.2 or 8.3 to be satisfied, or otherwise constitute a breach of this Agreement by the party failing to give such notice, in each case unless the underlying breach would independently result in a failure of the conditions set forth in Section 8.2 or 8.3 to be satisfied; and provided, further, that the delivery of any notice pursuant to this Section 7.9 shall not cure any breach of, or noncompliance with, any other provision of this Agreement or limit the remedies available to the party receiving such notice.

7.10. Dividends. After the date of this Agreement, each of Fifth Third and Comerica shall coordinate with the other the declaration of any dividends in respect of Fifth Third Common Stock and Comerica Common Stock and the record dates and payment dates relating thereto, it being the intention of the parties hereto that holders of Comerica Common Stock and the holders of Fifth Third Common Stock shall not receive two dividends, or fail to receive one dividend, in any quarter with respect to their shares of Comerica Common Stock or Fifth Third Common Stock, as applicable, and any shares of Fifth Third Common Stock any such holder receives in exchange therefor in the Merger.

7.11. Shareholder Litigation. Each party shall give each other party prompt notice of any shareholder litigation against such party or its directors or officers relating to the transactions contemplated by this Agreement, and shall give each other party the opportunity to participate (at such other's party's expense) in the defense or settlement of any such litigation. Each party shall give the other the right to review and comment on all filings or responses to be made by such party in connection with any such litigation, and will in good faith take such comments into account. No party shall agree to settle any such litigation without the other party's prior written consent, which consent shall not be unreasonably withheld, conditioned or delayed; provided, that each other party shall not be obligated to consent to any settlement which does not include a full release of such other party and its affiliates or which imposes an

injunction or other equitable relief after the Effective Time upon the Surviving Corporation or any of its affiliates.

7.12. Corporate Governance. Fifth Third shall take all appropriate action so that, as of the Effective Time, the number of directors constituting the Board of Directors of Fifth Third shall be increased by three (3) and three (3) current directors of Comerica determined by mutual agreement of Comerica and Fifth Third shall be appointed to the Board of Directors of Fifth Third.

7.13. Acquisition Proposals.

(a) Each party agrees that it will not, and will cause each of its Subsidiaries and its and their respective officers, directors, employees, agents, advisors and representatives (collectively, “Representatives”) not to, directly or indirectly, (i) initiate, solicit, knowingly encourage or knowingly facilitate any inquiries or proposals with respect to any Acquisition Proposal, (ii) engage or participate in any negotiations with any person concerning any Acquisition Proposal, (iii) provide any confidential or nonpublic information or data to, or have or participate in any discussions with any person relating to any Acquisition Proposal or (iv) unless this Agreement has been terminated in accordance with its terms, approve or enter into any term sheet, letter of intent, commitment, memorandum of understanding, agreement in principle, acquisition agreement, merger agreement or other agreement (whether written or oral, binding or nonbinding) (other than a confidentiality agreement referred to and entered into in accordance with this Section 7.13(a)) in connection with or relating to any Acquisition Proposal. Notwithstanding the foregoing, in the event that after the date of this Agreement and prior to the receipt of the Requisite Fifth Third Vote, in the case of Fifth Third, or the Requisite Comerica Vote, in the case of Comerica, a party receives an unsolicited *bona fide* written Acquisition Proposal, such party may, and may permit its Subsidiaries and its and its Subsidiaries’ Representatives to, furnish or cause to be furnished confidential or nonpublic information or data (provided that no such information or data relates to the other party) and participate in such negotiations or discussions with the person making the Acquisition Proposal if the Board of Directors of such party concludes in good faith (after receiving the advice of its outside counsel, and with respect to financial matters, its financial advisors) that failure to take such actions would be more likely than not to result in a violation of its fiduciary duties under applicable law; provided, that, prior to furnishing any confidential or nonpublic information permitted to be provided pursuant to this sentence, such party shall have entered into a confidentiality agreement with the person making such Acquisition Proposal on terms no less favorable to it than the Confidentiality Agreement, which confidentiality agreement shall not provide such person with any exclusive right to negotiate with such party. Each party will, and will cause its Representatives to, immediately cease and cause to be terminated any activities, discussions or negotiations conducted before the date of this Agreement with any person other than Comerica or Fifth Third, as applicable, with respect to any Acquisition Proposal. Each party will promptly (within twenty-four (24) hours) advise the other party following receipt of any Acquisition Proposal or any inquiry which could reasonably be expected to lead to an Acquisition Proposal, and the substance thereof (including the terms and conditions of and the identity of the person making such inquiry or Acquisition Proposal), will provide the other party with an unredacted copy of any such Acquisition Proposal and any draft agreements, proposals or other materials received or provided in connection with any such inquiry or Acquisition Proposal, and will keep



the other party apprised of any related developments, discussions and negotiations on a current basis, including any amendments to or revisions of the terms of such inquiry or Acquisition Proposal. Each party shall use its reasonable best efforts to enforce any existing confidentiality or standstill agreements to which it or any of its Subsidiaries is a party in accordance with the terms thereof. As used in this Agreement, “Acquisition Proposal” shall mean, with respect to Fifth Third or Comerica, as applicable, other than the transactions contemplated by this Agreement, any offer, proposal or inquiry relating to, or any third-party indication of interest in, (i) any acquisition or purchase, direct or indirect, of twenty-five percent (25%) or more of the consolidated assets of a party and its Subsidiaries or twenty-five percent (25%) or more of any class of equity or voting securities of a party or its Subsidiaries whose assets, individually or in the aggregate, constitute twenty-five percent (25%) or more of the consolidated assets of the party, (ii) any tender offer (including a self-tender offer) or exchange offer that, if consummated, would result in such third party beneficially owning twenty-five percent (25%) or more of any class of equity or voting securities of a party or its Subsidiaries whose assets, individually or in the aggregate, constitute twenty-five percent (25%) or more of the consolidated assets of the party, or (iii) a merger, consolidation, share exchange, business combination, reorganization, recapitalization, liquidation, dissolution or other similar transaction involving a party or its Subsidiaries whose assets, individually or in the aggregate, constitute twenty-five percent (25%) or more of the consolidated assets of the party.

(b) Nothing contained in this Agreement shall prevent a party or its Board of Directors from complying with Rule 14d-9 and Rule 14e-2 under the Exchange Act with respect to an Acquisition Proposal; provided, that such rules will in no way eliminate or modify the effect that any action pursuant to such rules would otherwise have under this Agreement.

7.14. Public Announcements. Comerica and Fifth Third agree that the initial press release with respect to the execution and delivery of this Agreement shall be a release mutually agreed to by Comerica and Fifth Third. Thereafter, each of the parties agrees that no public release or announcement or statement concerning this Agreement or the transactions contemplated hereby shall be issued by any party without the prior written consent of, after reasonable notice, the other party (which consent shall not be unreasonably withheld, conditioned or delayed), except (i) as required by applicable law or the rules or regulations of any applicable Governmental Entity or stock exchange to which the relevant party is subject, in which case the party required to make the release or announcement shall consult with the other party about, and allow the other party reasonable time to comment on, such release or announcement in advance of such issuance or (ii) for such releases, announcements or statements that are consistent with other such releases, announcement or statements made after the date of this Agreement in compliance with this Section 7.14.

7.15. Change of Method. Fifth Third and Comerica shall be empowered, upon their mutual agreement, at any time prior to the Effective Time, to change the method or structure of effecting the combination of Comerica and Fifth Third (including the provisions of Article I), if and to the extent they both deem such change to be necessary, appropriate or desirable; provided, however, that no such change shall (i) alter or change the Exchange Ratio or the number of shares of Fifth Third Common Stock received by holders of Comerica Common Stock in exchange for each share of Comerica Common Stock, (ii) adversely affect the tax treatment of Fifth Third’s shareholders or Comerica’s stockholders pursuant to this Agreement,



(iii) adversely affect the tax treatment of Fifth Third or Comerica pursuant to this Agreement or (iv) materially impede or delay the consummation of the transactions contemplated by this Agreement in a timely manner. Fifth Third and Comerica agree to reflect any such change in an appropriate amendment to this Agreement executed by the parties in accordance with Section 10.1.

7.16. Restructuring Efforts. If either Comerica or Fifth Third shall have failed to obtain the Requisite Comerica Vote or the Requisite Fifth Third Vote at the duly convened Comerica Meeting or Fifth Third Meeting, as applicable, or any adjournment or postponement thereof, each of the parties shall in good faith use its reasonable best efforts to negotiate a restructuring of the transactions provided for herein (it being understood that neither party shall have any obligation to alter or change any material terms, including the amount or kind of the consideration to be issued to holders of the capital stock of Comerica or Fifth Third as provided for in this Agreement, in a manner adverse to such party or its shareholders or stockholders, as applicable) and/or resubmit this Agreement and the transactions contemplated hereby (or as restructured pursuant to this Section 7.16) to its respective shareholders or stockholders, as applicable, for approval.

7.17. Takeover Statutes. None of Comerica, Comerica Holdings, Fifth Third, Fifth Third Intermediary or their respective Boards of Directors shall take any action that would cause any Takeover Statute to become applicable to this Agreement, the Mergers, the Bank Mergers or any of the other transactions contemplated hereby, and each shall take all necessary steps to exempt (or ensure the continued exemption of) the Mergers, the Bank Mergers and the other transactions contemplated hereby from any applicable Takeover Statute now or hereafter in effect. If any Takeover Statute may become, or may purport to be, applicable to the transactions contemplated hereby, each party and the members of their respective Boards of Directors will grant such approvals and take such actions as are necessary so that the transactions contemplated by this Agreement may be consummated as promptly as practicable on the terms contemplated hereby and otherwise act to eliminate or minimize the effects of any Takeover Statute on any of the transactions contemplated by this Agreement, including, if necessary, challenging the validity or applicability of any such Takeover Statute.

7.18. Assumption of Comerica Indebtedness. Upon the Effective Time (or at the effective time of the Bank Mergers for any debt of Comerica Bank and Comerica Bank & Trust), Fifth Third, Fifth Third Intermediary or Fifth Third Bank, as applicable, shall, to the extent permitted thereunder and required thereby, assume the due and punctual performance and observance of the covenants to be performed by Comerica, Comerica Bank or Comerica Bank & Trust pursuant to the definitive documents governing the short-term and long-term borrowings set forth on Section 7.18 of the Comerica Disclosure Schedule, and the due and punctual payment of the principal of such borrowings (and premium, if any) and interest thereon. In connection therewith, (i) Fifth Third and Comerica shall, and shall cause Fifth Third Bank, in the case of Fifth Third, and Comerica Bank and Comerica Bank & Trust, in the case of Comerica, to, cooperate and use reasonable best efforts to execute and deliver any supplemental indentures, if applicable, and (ii) Comerica shall, and shall cause Comerica Bank and Comerica Bank & Trust to, use reasonable best efforts to execute and deliver any officer's certificates or other documents, and to provide any opinions of counsel to the trustee thereof, in each case, required

to make such assumption effective as of the Effective Time or the effective time of the Bank Merger, as applicable.

7.19. Exemption from Liability Under Section 16(b). Comerica and Fifth Third agree that, in order to most effectively compensate and retain the Comerica Insiders, both prior to and after the Effective Time, it is desirable that Comerica Insiders not be subject to a risk of liability under Section 16(b) of the Exchange Act to the fullest extent permitted by applicable law in connection with the conversion of shares of Comerica Common Stock, Comerica Preferred Stock and Comerica Equity Awards in the Merger, and for that compensatory and retentive purpose agree to the provisions of this Section 7.19. The Boards of Directors of Fifth Third and of Comerica, or a committee of non-employee directors thereof (as such term is defined for purposes of Rule 16b-3(d) under the Exchange Act), shall prior to the Effective Time, take all such steps as may be necessary or appropriate to cause (x) in the case of Comerica, any dispositions of Comerica Common Stock, Comerica Preferred Stock or Comerica Equity Awards by Comerica Insiders and (y) in the case of Fifth Third, any acquisitions of Fifth Third Common Stock, New Fifth Third Preferred Stock or equity awards of Fifth Third into which the Comerica Equity awards are converted by any Comerica Insiders who, immediately following the Merger, will be officers or directors of Fifth Third subject to the reporting requirements of Section 16(a) of the Exchange Act, in each case pursuant to the transactions contemplated by this Agreement, to be exempt from liability pursuant to Rule 16b-3 under the Exchange Act to the fullest extent permitted by applicable law.

7.20. Stock Exchange Listing. Fifth Third shall cause the shares of Fifth Third Common Stock and the depositary shares in respect of the New Fifth Third Preferred Stock to be issued in the Merger to be approved for listing on NASDAQ, subject to official notice of issuance, prior to the Effective Time.

## **ARTICLE VIII**

### **CONDITIONS PRECEDENT**

8.1. Conditions to Each Party's Obligation to Effect the Merger. The respective obligations of the parties to effect the Merger shall be subject to the satisfaction at or prior to the Effective Time of the following conditions:

(a) Shareholder Approvals. The Stock Issuance shall have been approved by the shareholders of Fifth Third by the Requisite Fifth Third Vote and this Agreement shall have been adopted by the stockholders of Comerica by the Requisite Comerica Vote.

(b) NASDAQ Listing. The shares of Fifth Third Common Stock and the depositary shares in respect of the New Fifth Third Preferred Stock that shall be issuable pursuant to this Agreement shall have been authorized for listing on NASDAQ, subject to official notice of issuance.

(c) Regulatory Approvals. (i) All regulatory authorizations, consents, orders or approvals (x) from the Federal Reserve Board, the OCC and the Texas Department of Banking and (y) set forth in Sections 4.4 and 5.4 which are necessary to consummate the transactions contemplated by this Agreement, including the Mergers and the Bank Merger, or those the

failure of which to be obtained would reasonably be likely to have, individually or in the aggregate, a Material Adverse Effect on Fifth Third or the Surviving Entity, shall have been obtained and shall remain in full force and effect and all statutory waiting periods in respect thereof shall have expired or been terminated (such approvals and the expiration of such waiting periods being referred to herein as the “Requisite Regulatory Approvals”) and (ii) no such Requisite Regulatory Approval shall have resulted in the imposition of any Materially Burdensome Regulatory Condition.

(d) S-4. The S-4 shall have become effective under the Securities Act and no stop order suspending the effectiveness of the S-4 shall have been issued, and no proceedings for such purpose shall have been initiated or threatened by the SEC and not withdrawn.

(e) No Injunctions or Restraints; Illegality. No order, injunction or decree issued by any court or Governmental Entity of competent jurisdiction or other legal restraint or prohibition preventing the consummation of the Merger, the Second Step Merger, the Bank Mergers or any of the other transactions contemplated by this Agreement shall be in effect. No law, statute, rule, regulation, order, injunction or decree shall have been enacted, entered, promulgated or enforced by any Governmental Entity which prohibits or makes illegal consummation of the Merger, the Second Step Merger, the Bank Mergers or any of the other transactions contemplated by this Agreement.

8.2. Conditions to Obligations of Fifth Third and Fifth Third Intermediary. The respective obligations of Fifth Third and Fifth Third Intermediary to effect the Merger are also subject to the satisfaction, or waiver by Fifth Third (on behalf of itself and Fifth Third Intermediary), at or prior to the Effective Time, of the following conditions:

(a) Representations and Warranties. The representations and warranties of Comerica set forth in Section 4.2(a) and Section 4.8(a) (in each case after giving effect to the lead-in to Article IV) shall be true and correct (other than, in the case of Section 4.2(a), such failures to be true and correct as are *de minimis*) in each case as of the date of this Agreement and as of the Closing Date as though made on and as of the Closing Date (except to the extent such representations and warranties speak as of an earlier date, in which case as of such earlier date), and the representations and warranties of Comerica set forth in Section 4.1(a), Section 4.1(b) (but only with respect to Comerica Bank and Comerica Bank & Trust), Section 4.2(c) (but only with respect to Comerica Bank and Comerica Bank & Trust), Section 4.3(a) and Section 4.7 (read without giving effect to any qualification as to materiality or Material Adverse Effect set forth in such representations or warranties but, in each case, after giving effect to the lead-in to Article IV) shall be true and correct in all material respects as of the date of this Agreement and as of the Closing Date as though made on and as of the Closing Date (except to the extent such representations and warranties speak as of an earlier date, in which case as of such earlier date). All other representations and warranties of Comerica set forth in this Agreement (read without giving effect to any qualification as to materiality or Material Adverse Effect set forth in such representations or warranties but, in each case, after giving effect to the lead-in to Article IV) shall be true and correct in all respects as of the date of this Agreement and as of the Closing Date as though made on and as of the Closing Date (except to the extent such representations and warranties speak as of an earlier date, in which case as of such earlier date); provided, however, that for purposes of this sentence, such representations and

warranties shall be deemed to be true and correct unless the failure or failures of such representations and warranties to be so true and correct, either individually or in the aggregate, and without giving effect to any qualification as to materiality or Material Adverse Effect set forth in such representations or warranties, has had or would reasonably be expected to have a Material Adverse Effect on Comerica or the Surviving Entity. Fifth Third shall have received a certificate dated as of the Closing Date and signed on behalf of Comerica by the Chief Executive Officer or the Chief Financial Officer of Comerica to the foregoing effect.

(b) Performance of Obligations of Comerica. Comerica shall have performed in all material respects the obligations, covenants and agreements required to be performed by it under this Agreement at or prior to the Closing Date, and Fifth Third shall have received a certificate dated as of the Closing Date and signed on behalf of Comerica by the Chief Executive Officer or the Chief Financial Officer of Comerica to such effect.

(c) Federal Tax Opinion. Fifth Third shall have received the written opinion of Sullivan & Cromwell LLP, in form and substance reasonably satisfactory to Fifth Third, dated as of the Closing Date, to the effect that, on the basis of facts, representations and assumptions set forth or referred to in such opinion, the Merger will qualify as a “reorganization” within the meaning of Section 368(a) of the Code (the “Fifth Third Tax Opinion”). In rendering such opinion, counsel may require and rely upon representations contained in certificates of officers of Fifth Third, Fifth Third Intermediary and Comerica reasonably satisfactory in form and substance to such counsel.

8.3. Conditions to Obligations of Comerica. The obligation of Comerica to effect the Merger is also subject to the satisfaction, or waiver by Comerica, at or prior to the Effective Time of the following conditions:

(a) Representations and Warranties. The representations and warranties of Fifth Third set forth in Section 5.2(a) and Section 5.8(a) (in each case, after giving effect to the lead-in to Article V) shall be true and correct (other than, in the case of Section 5.2(a), such failures to be true and correct as are *de minimis*) in each case as of the date of this Agreement and as of the Closing Date as though made on and as of the Closing Date (except to the extent such representations and warranties speak as of an earlier date, in which case as of such earlier date), and the representations and warranties of Fifth Third set forth in Section 5.1(a), Section 5.1(b) (but only with respect to Fifth Third Bank), Section 5.2(b) (but only with respect to Fifth Third Bank), Section 5.3(a) and Section 5.7 (read without giving effect to any qualification as to materiality or Material Adverse Effect set forth in such representations or warranties but, in each case, after giving effect to the lead-in to Article V) shall be true and correct in all material respects as of the date of this Agreement and as of the Closing Date as though made on and as of the Closing Date (except to the extent such representations and warranties speak as of an earlier date, in which case as of such earlier date). All other representations and warranties of Fifth Third set forth in this Agreement (read without giving effect to any qualification as to materiality or Material Adverse Effect set forth in such representations or warranties but, in each case, after giving effect to the lead-in to Article V) shall be true and correct in all respects as of the date of this Agreement and as of the Closing Date as though made on and as of the Closing Date (except to the extent such representations and warranties speak as of an earlier date, in which case as of such earlier date), provided, however,

that for purposes of this sentence, such representations and warranties shall be deemed to be true and correct unless the failure or failures of such representations and warranties to be so true and correct, either individually or in the aggregate, and without giving effect to any qualification as to materiality or Material Adverse Effect set forth in such representations or warranties, has had or would reasonably be expected to have a Material Adverse Effect on Fifth Third or the Surviving Entity. Comerica shall have received a certificate dated as of the Closing Date and signed on behalf of Fifth Third by the Chief Executive Officer or the Chief Financial Officer of Fifth Third to the foregoing effect.

(b) Performance of Obligations of Fifth Third and Fifth Third Intermediary. Each of Fifth Third and Fifth Third Intermediary shall have performed in all material respects the obligations, covenants and agreements required to be performed by it under this Agreement at or prior to the Closing Date, and Comerica shall have received a certificate dated as of the Closing Date and signed on behalf of Fifth Third by the Chief Executive Officer or the Chief Financial Officer of Fifth Third to such effect.

(c) Federal Tax Opinion. Comerica shall have received the written opinion of Wachtell, Lipton, Rosen & Katz, in form and substance reasonably satisfactory to Comerica, dated as of the Closing Date, to the effect that, on the basis of facts, representations and assumptions set forth or referred to in such opinion, the Merger will qualify as a “reorganization” within the meaning of Section 368(a) of the Code (the “Comerica Tax Opinion”). In rendering such opinion, counsel may require and rely upon representations contained in certificates of officers of Fifth Third, Fifth Third Intermediary and Comerica reasonably satisfactory in form and substance to such counsel.

## **ARTICLE IX**

### **TERMINATION AND AMENDMENT**

9.1. Termination. This Agreement may be terminated at any time prior to the Effective Time, whether before or after receipt of the Requisite Comerica Vote or the Requisite Fifth Third Vote:

- (a) by mutual written consent of Fifth Third and Comerica;
- (b) by either Fifth Third or Comerica if any Governmental Entity that must grant a Requisite Regulatory Approval has denied approval of the Merger or the Bank Mergers and such denial has become final and nonappealable or any Governmental Entity of competent jurisdiction shall have issued a final and nonappealable order, injunction, decree or other legal restraint or prohibition permanently enjoining or otherwise prohibiting or making illegal the consummation of the Merger or the Bank Merger, unless the failure to obtain a Requisite Regulatory Approval shall be due to the failure of the party seeking to terminate this Agreement to perform or observe the obligations, covenants and agreements of such party set forth herein;
- (c) by either Fifth Third or Comerica if the Merger shall not have been consummated on or before October 5, 2026 of the date of the Agreement (as it may be extended pursuant to this Section 9.1(c), the “Termination Date”), unless the failure of the Closing to occur by such date shall be due to the failure of the party seeking to terminate this Agreement to



perform or observe the obligations, covenants and agreements of such party set forth herein; provided, that (i) if on such date, any of the conditions to the Closing set forth in (A) Section 8.1(c) or (B) Section 8.1(e) (to the extent related to a Requisite Regulatory Approval), shall not have been satisfied or waived on or prior to such date, but all other conditions set forth in Article VIII shall have been satisfied or waived (or in the case of conditions that by their nature can only be satisfied at the Closing, shall then be capable of being satisfied if the Closing were to take place on such date), then the Termination Date shall be automatically extended to January 5, 2027, and such date shall become the Termination Date for purposes of this Agreement; and (ii) if all the conditions set forth in Article VIII are satisfied (or in the case of conditions that by their nature can only be satisfied at the Closing, shall then be capable of being satisfied if the Closing were to take place on such date) on a date that occurs on or prior to the Termination Date but the Closing would thereafter occur in accordance with Section 1.3 on a date (the “Specified Date”) after the Termination Date, then the Termination Date shall automatically be extended to such Specified Date and the Specified Date shall become the Termination Date for all purposes of this Agreement;

(d) by either Fifth Third or Comerica (provided, that the terminating party is not then in material breach of any representation, warranty, obligation, covenant or other agreement contained herein) if there shall have been a breach of any of the obligations, covenants or agreements or any of the representations or warranties (or any such representation or warranty shall cease to be true) set forth in this Agreement on the part of Comerica, in the case of a termination by Fifth Third, or Fifth Third or Fifth Third Intermediary, in the case of a termination by Comerica, which breach or failure to be true, either individually or in the aggregate with all other breaches by such party (or failures of such representations or warranties to be true), would constitute, if occurring or continuing on the Closing Date, the failure of a condition set forth in Section 8.2, in the case of a termination by Fifth Third, or Section 8.3, in the case of a termination by Comerica, and which is not cured within forty-five (45) days following written notice to Comerica, in the case of a termination by Fifth Third, or Fifth Third, in the case of a termination by Comerica, or by its nature or timing cannot be cured during such period (or such fewer days as remain prior to the Termination Date);

(e) by Comerica, if (i) Fifth Third or the Board of Directors of Fifth Third shall have made a Recommendation Change or (ii) Fifth Third or the Board of Directors of Fifth Third shall have breached its obligations under Section 7.3 or 7.13 in any material respect; or

(f) by Fifth Third, if (i) Comerica or the Board of Directors of Comerica shall have made a Recommendation Change or (ii) Comerica or the Board of Directors of Comerica shall have breached its obligations under Section 7.3 or 7.13 in any material respect.

## 9.2. Effect of Termination.

(a) In the event of termination of this Agreement by either Fifth Third or Comerica as provided in Section 9.1, this Agreement shall forthwith become void and have no effect, and none of Fifth Third, Comerica, any of their respective Subsidiaries or any of the officers or directors of any of them shall have any liability of any nature whatsoever hereunder, or in connection with the transactions contemplated hereby, except that (i) Section 7.2(b) (Access to Information; Confidentiality), Section 7.14 (Public Announcements), this Section 9.2



and Article X shall survive any termination of this Agreement, and (ii) notwithstanding anything to the contrary contained in this Agreement, none of Fifth Third, Fifth Third Intermediary, Comerica or Comerica Holdings shall be relieved or released from any liabilities or damages arising out of its willful and material breach of any provision of this Agreement.

(b) (i) In the event that after the date of this Agreement and prior to the termination of this Agreement, a *bona fide* Acquisition Proposal shall have been communicated to or otherwise made known to the Board of Directors or senior management of Comerica or shall have been made directly to the stockholders of Comerica or any person shall have publicly announced (and not withdrawn at least two (2) business days prior to the Comerica Meeting) an Acquisition Proposal, in each case with respect to Comerica and (A) (x) thereafter this Agreement is terminated by either Fifth Third or Comerica pursuant to Section 9.1(c) without the Requisite Comerica Vote having been obtained (and all other conditions set forth in Section 8.1 and Section 8.3 were satisfied or were capable of being satisfied prior to such termination) or (y) thereafter this Agreement is terminated by Fifth Third pursuant to Section 9.1(d) as a result of a willful breach, and (B) prior to the date that is twelve (12) months after the date of such termination, Comerica enters into a definitive agreement or consummates a transaction with respect to an Acquisition Proposal (whether or not the same Acquisition Proposal as that referred to above), then Comerica shall, on the earlier of the date it enters into such definitive agreement and the date of consummation of such transaction, pay Fifth Third, by wire transfer of same-day funds, a fee equal to \$500,000,000 (the “Termination Fee”); provided that for purposes of this Section 9.2(b)(i), all references in the definition of Acquisition Proposal to “twenty-five percent (25%)” shall instead refer to “fifty percent (50%).”

(ii) In the event that this Agreement is terminated by Fifth Third pursuant to Section 9.1(f), then Comerica shall pay Fifth Third, by wire transfer of same-day funds, the Termination Fee within two (2) business days of the date of termination.

(c) (i) In the event that after the date of this Agreement and prior to the termination of this Agreement, a *bona fide* Acquisition Proposal shall have been communicated to or otherwise made known to the Board of Directors or senior management of Fifth Third or shall have been made directly to the shareholders of Fifth Third or any person shall have publicly announced (and not withdrawn at least two (2) business days prior to the Fifth Third Meeting) an Acquisition Proposal, in each case with respect to Fifth Third and (A) (x) thereafter this Agreement is terminated by either Fifth Third or Comerica pursuant to Section 9.1(c) without the Requisite Fifth Third Vote having been obtained (and all other conditions set forth in Section 8.1 and Section 8.2 were satisfied or were capable of being satisfied prior to such termination) or (y) thereafter this Agreement is terminated by Comerica pursuant to Section 9.1(d) as a result of a willful breach and (B) prior to the date that is twelve (12) months after the date of such termination, Fifth Third enters into a definitive agreement or consummates a transaction with respect to an Acquisition Proposal (whether or not the same Acquisition Proposal as that referred to above), then Fifth Third shall, on the earlier of the date it enters into such definitive agreement and the date of consummation of such transaction, pay Comerica the Termination Fee by wire transfer of same-day funds; provided, that for purposes of this Section 9.2(c)(i), all references in the definition of Acquisition Proposal to “twenty-five percent (25%)” shall instead refer to “fifty percent (50%).”

(ii) In the event that this Agreement is terminated by Comerica pursuant to Section 9.1(e), then Fifth Third shall pay Comerica, by wire transfer of same-day funds, the Termination Fee within two (2) business days of the date of termination.

(d) Notwithstanding anything to the contrary herein, but without limiting the right of any party to recover liabilities or damages to the extent permitted herein, in no event shall either party be required to pay the Termination Fee more than once.

(e) Each of Fifth Third, Fifth Third Intermediary, Comerica and Comerica Holdings acknowledges that the agreements contained in this Section 9.2 are an integral part of the transactions contemplated by this Agreement, and that, without these agreements, the other parties would not enter into this Agreement; accordingly, if Fifth Third or Comerica, as the case may be, fails promptly to pay the amount due pursuant to this Section 9.2, and, in order to obtain such payment, the other party commences a suit which results in a judgment against the non-paying party for the Termination Fee or any portion thereof, such non-paying party shall pay the costs and expenses of the other party (including attorneys' fees and expenses) in connection with such suit. In addition, if Fifth Third or Comerica, as the case may be, fails to pay the amounts payable pursuant to this Section 9.2, then such party shall pay interest on such overdue amounts at a rate per annum equal to the "prime rate" published in the *Wall Street Journal* on the date on which such payment was required to be made for the period commencing as of the date that such overdue amount was originally required to be paid and ending on the date that such overdue amount is actually paid in full.

## ARTICLE X GENERAL PROVISIONS

10.1. Amendment. Subject to compliance with applicable law, this Agreement may be amended by the parties hereto at any time before or after the receipt of the Requisite Fifth Third Vote or the Requisite Comerica Vote; provided, however, that after the receipt of the Requisite Fifth Third Vote or the Requisite Comerica Vote, there may not be, without further approval of the shareholders or stockholders of Fifth Third or Comerica, as applicable, any amendment of this Agreement that requires such further approval under applicable law. This Agreement may not be amended, modified or supplemented in any manner, whether by course of conduct or otherwise, except by an instrument in writing, signed on behalf of each of the parties hereto.

10.2. Extension; Waiver. At any time prior to the Effective Time, each of the parties hereto may, to the extent legally allowed, (a) extend the time for the performance of any of the obligations or other acts of the other party hereto, (b) waive any inaccuracies in the representations and warranties of the other party contained herein or in any document delivered by such other party pursuant hereto, and (c) waive compliance with any of the agreements or satisfaction of any conditions for its benefit contained herein; provided, however, that after the receipt of the Requisite Fifth Third Vote or the Requisite Comerica Vote, there may not be, without further approval of the shareholders or stockholders of Fifth Third or Comerica, as applicable, any extension or waiver of this Agreement or any portion thereof that requires such further approval under applicable law. Any agreement on the part of a party hereto to any such extension or waiver shall be valid only if set forth in a written instrument signed on behalf of

such party, but such extension or waiver or failure to insist on strict compliance with an obligation, covenant, agreement or condition shall not operate as a waiver of, or estoppel with respect to, any subsequent or other failure.

10.3. Nonsurvival of Representations, Warranties and Agreements. None of the representations, warranties, obligations, covenants and agreements in this Agreement (or in any certificate delivered pursuant to this Agreement) shall survive the Effective Time, except for Section 7.7 and for those other obligations, covenants and agreements contained herein which by their terms apply in whole or in part after the Effective Time.

10.4. Expenses. Except as otherwise expressly provided in this Agreement, all costs and expenses incurred in connection with this Agreement and the transactions contemplated hereby shall be paid by the party incurring such expense; provided, however, that the costs and expenses of printing and mailing the Joint Proxy Statement and all filing and other fees paid to Governmental Entities in connection with the Mergers and the other transactions contemplated hereby shall be borne equally by Fifth Third and Comerica.

10.5. Notices. All notices and other communications hereunder shall be in writing and shall be deemed given (a) on the date of delivery if delivered personally, or if by e-mail transmission (with confirmation of receipt requested), (b) on the earlier of confirmed receipt or the fifth (5th) business day following the date of mailing if mailed by registered or certified mail (return receipt requested) or (c) on the first (1st) business day following the date of dispatch if delivered using a next-day service by a recognized next-day courier (with confirmation) to the parties at the following addresses (or at such other address for a party as shall be specified by like notice):

(a) if to Fifth Third or Fifth Third Intermediary, to:

Fifth Third Bancorp  
38 Fountain Square Plaza  
Cincinnati, Ohio 45263  
Attention: Christian Gonzalez  
E-mail: christian.gonzalez@53.com

*With a copy (which shall not constitute notice) to:*

Sullivan & Cromwell LLP  
125 Broad Street  
New York, New York 10004  
Attention: H. Rodgin Cohen and Mitchell S. Eitel  
Email: cohenhr@sullcrom.com and eitelm@sullcrom.com

and

(b) if to Comerica or Comerica Holdings, to:

Comerica Incorporated  
1717 Main Street  
Dallas, Texas 75201  
Attention: Von E. Hays and Nicole V. Gersch  
E-mail: VEHays@comerica.com and NVGersch@comerica.com

*With a copy (which shall not constitute notice) to:*

Wachtell, Lipton, Rosen & Katz  
51 West 52<sup>nd</sup> Street  
New York, NY 10019  
Attention: Edward D. Herlihy and Matthew M. Guest  
E-mail: EDHerlihy@wlrk.com and MGuest@wlrk.com

10.6. Interpretation. The parties have participated jointly in negotiating and drafting this Agreement. In the event that an ambiguity or a question of intent or interpretation arises, this Agreement shall be construed as if drafted jointly by the parties, and no presumption or burden of proof shall arise favoring or disfavoring any party by virtue of the authorship of any provision of this Agreement. When a reference is made in this Agreement to Articles, Sections, Exhibits or Schedules, such reference shall be to an Article or Section of or Exhibit or Schedule to this Agreement unless otherwise indicated. The table of contents and headings contained in this Agreement are for reference purposes only and shall not affect in any way the meaning or interpretation of this Agreement. Whenever the words “include,” “includes” or “including” are used in this Agreement, they shall be deemed to be followed by the words “without limitation.” The word “or” shall not be exclusive. References to “the date hereof” shall mean the date of this Agreement. As used in this Agreement, the “knowledge” of Comerica means the actual knowledge of any of the officers of Comerica listed on Section 10.6 of the Comerica Disclosure Schedule, and the “knowledge” of Fifth Third means the actual knowledge of any of the officers of Fifth Third listed on Section 10.6 of the Fifth Third Disclosure Schedule. As used herein, (a) the term “person” means any individual, corporation (including not-for-profit), general or limited partnership, limited liability company, joint venture, estate, trust, association, organization, Governmental Entity or other entity of any kind or nature, (b) an “affiliate” of a specified person is any person that directly or indirectly controls, is controlled by, or is under common control with, such specified person, (c) the term “made available” means any document or other information that was (i) provided by one party or its representatives to the other party and its representatives at least one (1) day prior to the date hereof, (ii) included in the virtual data room of a party at least one (1) day prior to the date hereof or (iii) filed by a party with the SEC and publicly available on EDGAR at least one (1) day prior to the date hereof, and (d) the “transactions contemplated hereby” and “transactions contemplated by this Agreement” shall include the Mergers and the Bank Merger. The Comerica Disclosure Schedule and the Fifth Third Disclosure Schedule, as well as all other schedules and all exhibits hereto, shall be deemed part of this Agreement and included in any reference to this Agreement. Nothing contained herein shall require any party or person to take any action in violation of applicable law.

10.7. Counterparts. This Agreement may be executed in counterparts, all of which shall be considered one and the same agreement and shall become effective when counterparts have been signed by each of the parties and delivered to the other parties, it being understood that all parties need not sign the same counterpart.

10.8. Entire Agreement. This Agreement (including the documents and instruments referred to herein) together with the Confidentiality Agreement constitutes the entire agreement among the parties and supersedes all prior agreements and understandings, both written and oral, among the parties with respect to the subject matter hereof.

10.9. Governing Law; Jurisdiction.

(a) This Agreement shall be governed by and construed in accordance with the laws of the State of Ohio, without regard to any applicable conflicts of law principles (except that matters relating to the fiduciary duties of the Board of Directors of Comerica shall be subject to the laws of the State of Delaware).

(b) Each party agrees that it will bring any action or proceeding in respect of any claim arising out of or related to this Agreement or the transactions contemplated hereby exclusively in the Delaware Court of Chancery and any state appellate court therefrom within the State of Delaware or, if the Delaware Court of Chancery declines to accept jurisdiction over a particular matter, any federal or state court of competent jurisdiction located in the State of Delaware (the "Chosen Courts"), and, solely in connection with claims arising under this Agreement or the transactions that are the subject of this Agreement, (i) irrevocably submits to the exclusive jurisdiction of the Chosen Courts, (ii) waives any objection to laying venue in any such action or proceeding in the Chosen Courts, (iii) waives any objection that the Chosen Courts are an inconvenient forum or do not have jurisdiction over any party and (iv) agrees that service of process upon such party in any such action or proceeding will be effective if notice is given in accordance with Section 10.5.

10.10. Waiver of Jury Trial. EACH PARTY ACKNOWLEDGES AND AGREES THAT ANY CONTROVERSY WHICH MAY ARISE UNDER THIS AGREEMENT IS LIKELY TO INVOLVE COMPLICATED AND DIFFICULT ISSUES, AND THEREFORE EACH SUCH PARTY HEREBY IRREVOCABLY AND UNCONDITIONALLY WAIVES, TO THE EXTENT PERMITTED BY LAW AT THE TIME OF INSTITUTION OF THE APPLICABLE LITIGATION, ANY RIGHT SUCH PARTY MAY HAVE TO A TRIAL BY JURY IN RESPECT OF ANY LITIGATION DIRECTLY OR INDIRECTLY ARISING OUT OF OR RELATING TO THIS AGREEMENT OR THE TRANSACTIONS CONTEMPLATED BY THIS AGREEMENT. EACH PARTY CERTIFIES AND ACKNOWLEDGES THAT: (I) NO REPRESENTATIVE, AGENT OR ATTORNEY OF ANY OTHER PARTY HAS REPRESENTED, EXPRESSLY OR OTHERWISE, THAT SUCH OTHER PARTY WOULD NOT, IN THE EVENT OF LITIGATION, SEEK TO ENFORCE THE FOREGOING WAIVER, (II) EACH PARTY UNDERSTANDS AND HAS CONSIDERED THE IMPLICATIONS OF THIS WAIVER, (III) EACH PARTY MAKES THIS WAIVER VOLUNTARILY, AND (IV) EACH PARTY HAS BEEN INDUCED TO ENTER INTO THIS AGREEMENT BY, AMONG OTHER THINGS, THE MUTUAL WAIVERS AND CERTIFICATIONS IN THIS SECTION 10.10.



10.11. Assignment; Third-Party Beneficiaries. Neither this Agreement nor any of the rights, interests or obligations hereunder shall be assigned by any of the parties hereto (whether by operation of law or otherwise) without the prior written consent of the other party. Any purported assignment in contravention hereof shall be null and void. Subject to the preceding sentence, this Agreement will be binding upon, inure to the benefit of and be enforceable by the parties and their respective successors and assigns. Except as otherwise specifically provided in Section 7.7, this Agreement (including the documents and instruments referred to herein) is not intended to, and does not, confer upon any person other than the parties hereto any rights or remedies hereunder, including the right to rely upon the representations and warranties set forth herein. The representations and warranties in this Agreement are the product of negotiations among the parties hereto and are for the sole benefit of the parties. Any inaccuracies in such representations and warranties are subject to waiver by the parties hereto in accordance herewith without notice or liability to any other person. In some instances, the representations and warranties in this Agreement may represent an allocation among the parties hereto of risks associated with particular matters regardless of the knowledge of any of the parties hereto. Consequently, persons other than the parties may not rely upon the representations and warranties in this Agreement as characterizations of actual facts or circumstances as of the date of this Agreement or as of any other date.

10.12. Specific Performance. The parties hereto agree that irreparable damage would occur if any provision of this Agreement were not performed in accordance with the terms hereof and, accordingly, that the parties shall be entitled specific performance of the terms hereof, including an injunction or injunctions to prevent breaches or threatened breaches of this Agreement or to enforce specifically the performance of the terms and provisions hereof (including the parties' obligation to consummate the Mergers), in addition to any other remedy to which they are entitled at law or in equity. Each of the parties hereby further waives (a) any defense in any action for specific performance that a remedy at law would be adequate and (b) any requirement under any law to post security or a bond as a prerequisite to obtaining equitable relief.

10.13. Severability. Whenever possible, each provision or portion of any provision of this Agreement shall be interpreted in such manner as to be effective and valid under applicable law, but if any provision or portion of any provision of this Agreement is held to be invalid, illegal or unenforceable in any respect under any applicable law or rule in any jurisdiction, such invalidity, illegality or unenforceability shall not affect any other provision or portion of any provision in such jurisdiction, and this Agreement shall be reformed, construed and enforced in such jurisdiction such that the invalid, illegal or unenforceable provision or portion thereof shall be interpreted to be only so broad as is enforceable.

10.14. Confidential Supervisory Information. Notwithstanding any other provision of this Agreement, no disclosure, representation or warranty shall be made (or other action taken) pursuant to this Agreement that would involve the disclosure of confidential supervisory information of a Regulatory Agency or Governmental Entity by any party to this Agreement to the extent prohibited by applicable law. To the extent legally permissible, appropriate substitute disclosures or actions shall be made or taken under circumstances in which the limitations of the preceding sentence apply.



10.15. Delivery by Facsimile or Electronic Transmission. This Agreement and any signed agreement or instrument entered into in connection with this Agreement, and any amendments or waivers hereto or thereto, to the extent signed and delivered by means of a facsimile machine or by e-mail delivery of a “.pdf” format data file, shall be treated in all manner and respects as an original agreement or instrument and shall be considered to have the same binding legal effect as if it were the original signed version thereof delivered in person. No party hereto or to any such agreement or instrument shall raise the use of a facsimile machine or e-mail delivery of a “.pdf” format data file to deliver a signature to this Agreement or any amendment hereto or the fact that any signature or agreement or instrument was transmitted or communicated through the use of a facsimile machine or e-mail delivery of a “.pdf” format data file as a defense to the formation of a contract and each party hereto forever waives any such defense.

*[Signature Page Follows]*

IN WITNESS WHEREOF, each party has caused this Agreement to be executed by their respective officers thereunto duly authorized as of the date first above written.

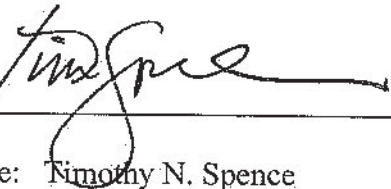
FIFTH THIRD BANCORP

By: \_\_\_\_\_

Name: Timothy N. Spence

Title: President and Chief Executive Officer

FIFTH THIRD FINANCIAL CORPORATION

By: \_\_\_\_\_

Name: Timothy N. Spence

Title: President and Chief Executive Officer

COMERICA INCORPORATED

By:

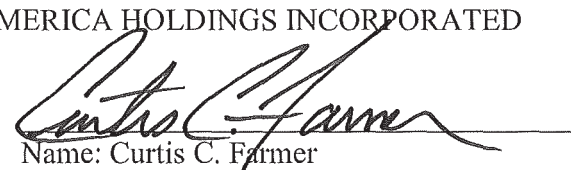
A handwritten signature in black ink, appearing to read "Curtis C. Farmer", is written over a horizontal line.

Name: Curtis C. Farmer

Title: Chairman, President and Chief  
Executive Officer

COMERICA HOLDINGS INCORPORATED

By:

A handwritten signature in black ink, appearing to read "Curtis C. Farmer", is written over a horizontal line.

Name: Curtis C. Farmer

Title: President and Chief  
Executive Officer

**Public Exhibit 3**

**Agreement and Plan of Merger, dated of October 21, 2025, by and among  
Fifth Third Bank, Comerica Bank, and Comerica Bank & Trust**

**AGREEMENT AND PLAN OF MERGER OF  
COMERICA BANK  
AND  
COMERICA BANK & TRUST, NATIONAL ASSOCIATION  
WITH AND INTO  
FIFTH THIRD BANK, NATIONAL ASSOCIATION**

This Agreement and Plan of Merger (this “Agreement”), dated as of October 21, 2025, is made by and among Fifth Third Bank, National Association, a national bank, Comerica Bank, a Texas state-chartered bank, and Comerica Bank & Trust, National Association, a national bank.

**WITNESSETH:**

**WHEREAS**, Fifth Third Bank, National Association is a national banking association duly organized and existing under the laws of the United States, with its main office located in Cincinnati, Ohio, all the issued and outstanding capital stock of which is owned as of the date hereof directly by Fifth Third Financial Corporation, an Ohio corporation (“Fifth Third Intermediary”) and a wholly owned subsidiary of Fifth Third Bancorp, an Ohio corporation (“Fifth Third”), and has authorized capital stock consisting of 454,042 common shares, par value \$10.00 per share;

**WHEREAS**, Comerica Bank is a Texas state-chartered bank, with its home office located in Dallas, Texas, all the issued and outstanding capital stock of which is owned as of the date hereof directly by Comerica Incorporated, a Delaware corporation (“Comerica”), and has authorized capital stock consisting of 5,852,732 shares of common stock, par value \$10.00 per share;

**WHEREAS**, Comerica Bank & Trust, National Association is a national banking association, duly organized and existing under the laws of the United States with its main office located in Ann Arbor, Michigan, all the issued and outstanding capital stock of which is owned as of the date hereof by Comerica Holdings Incorporated, a Delaware corporation (“Comerica Holdings”), and has authorized capital stock consisting of 20,000 shares of common stock, par value \$10.00 per share;

**WHEREAS**, Fifth Third, Fifth Third Intermediary, Comerica and Comerica Holdings have entered into an Agreement and Plan of Merger, dated as of October 5, 2025 (as amended, supplemented or otherwise modified in accordance with its terms, the “Merger Agreement”), pursuant to which, subject to the terms and conditions thereof, (i) Comerica will merge with and into Fifth Third Intermediary (the “Merger”), with Fifth Third Intermediary surviving the merger as the surviving corporation and (ii) immediately thereafter, Comerica Holdings will merge with and into Fifth Third Intermediary, with Fifth Third Intermediary surviving the merger as the surviving corporation (the “Second Step Merger” and, with the Merger, the “Mergers”);

**WHEREAS**, contingent upon the Mergers, on the terms and subject to the conditions contained in this Agreement, the parties to this Agreement intend to effect the merger of each of Comerica Bank and Comerica Bank & Trust, National Association with and into Fifth Third Bank, National Association, with Fifth Third Bank, National Association surviving each such merger (each such merger, a “Bank Merger,” and collectively, the “Bank Mergers”);

**WHEREAS**, the board of directors of Fifth Third Bank, National Association, the board of directors of Comerica Bank, and the board of directors of Comerica Bank & Trust, National Association have deemed the Bank Mergers advisable and in the best interests of their respective banks, and have each adopted resolutions authorizing and approving the execution and delivery of this Agreement and the transactions contemplated hereby; and

**WHEREAS**, Fifth Third Intermediary, as the sole shareholder of Fifth Third Bank, National Association, Comerica, as the sole shareholder of Comerica Bank, and Comerica Holdings, as the sole shareholder of Comerica Bank & Trust, National Association, have adopted and approved this Agreement.

**NOW, THEREFORE**, in consideration of the promises and of the mutual agreements herein contained, the parties, intending to be legally bound, hereto do hereby agree as follows:

## **ARTICLE I**

### **BANK MERGER**

Section 1.01 The Bank Merger. Subject to the terms and conditions of this Agreement, at the applicable Effective Time, Comerica Bank and Comerica Bank & Trust, National Association shall each be merged with and into Fifth Third Bank, National Association in accordance with the provisions of, and with the effects provided in, applicable law (including 12 U.S.C. § 215a-1, 12 U.S.C. § 1831u, 12 U.S.C. § 1828(c) and Texas Fin. Code § 32.501). At each Effective Time, the separate existence of Comerica Bank and Comerica Bank & Trust, National Association, as applicable, shall cease, and Fifth Third Bank, National Association, as the surviving entity in each Bank Merger (the “Surviving Bank”), shall continue its existence under the laws of the United States as a national banking association.

#### Section 1.02 Effects of the Merger.

(a) The Surviving Bank shall be responsible for all of the liabilities of every kind and description, including liabilities arising from the operation of any trust department, of each of Comerica Bank, Comerica Bank & Trust, National Association, and Fifth Third Bank, National Association existing as of the applicable Effective Time.

(b) All assets and all rights, franchises and interests of each of Comerica Bank and Comerica Bank & Trust, National Association in and to every type of property (including intellectual, real, personal and mixed), tangible and intangible, and choses in action, in each case, as they exist immediately prior to the applicable Effective Time, shall be transferred to and vested in the Surviving Bank by virtue of each Bank Merger without any deed, conveyance or other transfer.

(c) Immediately following the applicable Effective Time, the Surviving Bank shall continue to operate the main office and each of the branches of Comerica Bank and Comerica Bank & Trust, National Association, as applicable, existing as of the Effective Times as branches of the Surviving Bank at the officially designated address of each such office or branch and shall continue to operate each of the branches of the Surviving Bank existing at the Effective Times, in each case without limiting the authority under applicable law of Fifth Third



Bank, National Association or of the Surviving Bank (as applicable) to close, relocate or otherwise make any change regarding any such branch.

Section 1.03 Closing. Subject to the terms and conditions of this Agreement and applicable law, the closing of the Bank Mergers will take place remotely by electronic exchange of documents at such date and time as shall be determined by the Fifth Third Bank, National Association, but in no case prior to the date and time on which all of the conditions precedent to the consummation of the Bank Mergers specified in this Agreement shall have been satisfied or duly waived by the party or parties entitled to satisfaction thereof.

Section 1.04 Effective Time. On the terms and subject to the conditions of this Agreement and subject to applicable law, each Bank Merger shall become effective as set forth in the certification of merger issued by the Office of the Comptroller of the Currency (“OCC”) (the date and time of each such effectiveness being herein referred to as an “Effective Time”).

Section 1.05 Articles of Association and By-laws. The national bank charter, articles of association and bylaws of Fifth Third Bank, National Association in effect immediately prior to each Effective Time shall be the national bank charter, articles of association and the bylaws of the Surviving Bank following each Bank Merger, in each case until amended in accordance with applicable law and the terms thereof.

Section 1.06 Name and Main Office. The name of the Surviving Bank in each Bank Merger shall be “Fifth Third Bank, National Association” and the main office of the Surviving Bank in each Bank Merger shall be located at 38 Fountain Square Plaza, Cincinnati, Ohio, 45263.

Section 1.07 Tax Treatment. It is the intention of the parties that (i) each Bank Merger be treated for U.S. federal income tax purposes as a “tax free reorganization” pursuant to Section 368(a) of the Internal Revenue Code of 1986, as amended (the “Code”) and (ii) this Agreement shall constitute a “plan of reorganization” for purposes of Sections 354 and 361 of the Code.

## **ARTICLE II**

### **TREATMENT OF SHARES**

Section 2.01 Effect on Comerica Bank Capital Stock. At the applicable Effective Time, by virtue of the applicable Bank Merger and without any action on the part of the holder of any capital stock of Comerica Bank, all shares of Comerica Bank capital stock issued and outstanding shall be automatically cancelled and retired and shall cease to exist, and no cash, new shares of common stock, or other property shall be delivered in exchange therefor.

Section 2.02 Effect on Comerica Bank & Trust, National Association Capital Stock. At the applicable Effective Time, by virtue of the applicable Bank Merger and without any action on the part of the holder of any capital stock of Comerica Bank & Trust, National Association, all shares of Comerica Bank & Trust, National Association capital stock issued and outstanding shall be automatically cancelled and retired and shall cease to exist, and no cash, new shares of common stock, or other property shall be delivered in exchange therefor.

Section 2.03 Effect on Fifth Third Bank, National Association Capital Stock. Each share of Fifth Third Bank, National Association capital stock issued and outstanding immediately prior to each Effective Time shall remain issued and outstanding and unaffected by each of the Bank Mergers.

### **ARTICLE III**

#### **COVENANTS**

Section 3.01 If at any time the Surviving Bank shall reasonably require that any further assignments, conveyances or assurances are necessary or desirable to vest, perfect or confirm in the Surviving Bank title to any property or rights of Comerica Bank or Comerica Bank & Trust, National Association as of the applicable Effective Time or otherwise carry out the provisions hereof, the proper officers and directors of Comerica Bank and Comerica Bank & Trust, National Association, as of the applicable Effective Time, and thereafter the officers of the Surviving Bank acting on behalf of Comerica Bank or Comerica Bank & Trust, National Association, as applicable, shall execute and deliver any and all proper assignments, conveyances and assurances, and do all things necessary or desirable to vest, perfect or confirm title to such property or rights in the Surviving Bank and otherwise carry out the provisions hereof.

### **ARTICLE IV**

#### **CONDITIONS PRECEDENT**

Section 4.01 Each Bank Merger and the respective obligations of each party hereto to consummate the applicable Bank Merger are subject to the fulfillment or written waiver of each of the following conditions prior to the applicable Effective Time:

- a. The approval of the OCC under 12 U.S.C. § 215a-1, 12 U.S.C. § 1831u and 12 U.S.C. § 1828(c) with respect to each Bank Merger and compliance with the requirements set forth in TX Fin. Code §§ 32.501 with respect to the merger of Comerica Bank with and into Fifth Third Bank, National Association, shall have been obtained or achieved and shall be in full force and effect, and all related waiting periods shall have expired; and all other material consents, approvals, permissions, and authorizations of, filings and registrations with, and notifications to, all governmental authorities required for the consummation of the applicable Bank Merger shall have been obtained or made and shall be in full force and effect and all waiting periods required by law shall have expired or been terminated.
- b. The Mergers shall have been consummated in accordance with the terms of the Merger Agreement.
- c. No jurisdiction, court of competent jurisdiction or governmental authority shall have enacted, issued, promulgated, enforced or entered any statute, rule, regulation, judgment, decree, injunction or other order (whether temporary,

preliminary or permanent) which is in effect and prohibits consummation of the Bank Mergers.

- d. This Agreement and the Bank Mergers shall have been approved, or ratified and confirmed, as applicable, by the sole voting stockholder of each of Fifth Third Bank, National Association, Comerica Bank and Comerica Bank & Trust, National Association.

## **ARTICLE V**

### **TERMINATION AND AMENDMENT**

Section 5.01 Termination. This Agreement may be terminated at any time prior to an Effective Time by a written instrument executed by each of the parties hereto. This Agreement will terminate automatically without any action by the parties hereto upon the termination of the Merger Agreement as therein provided.

Section 5.02 Amendment; Assignment. This Agreement may be amended by an instrument in writing signed on behalf of each of the parties hereto. Neither this Agreement nor any of the rights, interests or obligations may be assigned by any of the parties hereto (whether by operation of law or otherwise) and any attempted assignment in contravention of this Section 5.02 shall be null and void.

## **ARTICLE VI**

### **GENERAL PROVISIONS**

Section 6.01 Representations and Warranties. Each of the parties hereto represents and warrants that this Agreement has been duly authorized, executed and delivered by such party and constitutes the legal, valid and binding obligation of such party, enforceable against it in accordance with the terms hereof.

Section 6.02 Nonsurvival of Agreements. None of the representations, warranties or agreements in this Agreement or in any instrument delivered pursuant to this Agreement shall survive the Effective Time or the termination of this Agreement in accordance with Section 5.01.

Section 6.03 Notices. All notices and other communications in connection with this Agreement shall be in writing and shall be duly deemed given (a) on the date of delivery if delivered personally, or if by email, upon confirmation of receipt, (b) on the first business day following the date of dispatch if delivered utilizing a next-day service by a recognized next-day courier or (c) on the earlier of confirmed receipt or the fifth business day following the date of mailing if delivered by registered or certified mail, return receipt requested, postage prepaid. All notices hereunder shall be delivered to the addresses set forth below, or pursuant to such other instructions as may be designated in writing by the party to receive such notice:

If to Fifth Third Bank, National Association, to:

Fifth Third Bank, National Association  
38 Fountain Square Plaza  
Cincinnati, Ohio 45263  
Attention: Christian Gonzalez  
E-mail: Christian.Gonzalez@53.com

*With a copy (which shall not constitute notice) to:*

Sullivan & Cromwell LLP  
125 Broad Street  
New York, New York 10004  
Attention: H. Rodgin Cohen and Mitchell S. Eitel  
Email: cohenhr@sullcrom.com and eitelm@sullcrom.com

If to Comerica Bank or Comerica Bank & Trust, National Association, to:

Comerica Incorporated  
1717 Main Street  
Dallas, Texas 75201  
Attention: Von E. Hays and Nicole V. Gersch  
E-mail: VEHays@comerica.com and NVGersch@comerica.com

*With a copy (which shall not constitute notice) to:*

Wachtell, Lipton, Rosen & Katz  
51 W. 52nd Street  
New York, NY 10019  
Attention: Edward D. Herlihy and Matthew M. Guest  
E-mail: EDHerlihy@wlrk.com and MGuest@wlrk.com

Section 6.04 Interpretation. The words “hereof,” “herein” and “hereunder” and words of similar import when used in this Agreement shall refer to this Agreement as a whole and not to any particular provision of this Agreement, and section references are to this Agreement unless otherwise specified. The headings contained in this Agreement are for reference purposes only and shall not affect in any way the meaning or interpretation of this Agreement. Whenever the words “include,” “includes” or “including” are used in this Agreement, they shall be deemed to be followed by the words “without limitation.” References to “the date hereof” shall mean the date of this Agreement.

Section 6.05 Counterparts. This Agreement may be executed in two (2) or more counterparts (including by electronic means), all of which shall be considered one and the same agreement and shall become effective when counterparts have been signed by each of the parties and delivered to the other party, it being understood that each party need not sign the same counterpart.

Section 6.06 Entire Agreement. This Agreement (including the documents and the instruments referred to herein) constitutes the entire agreement and supersedes all prior

agreements and understandings, both written and oral, among the parties with respect to the subject matter of this Agreement, other than the Merger Agreement.

Section 6.07 Governing Law; WAIVER OF JURY TRIAL. This Agreement shall be governed by and construed in accordance with the laws of the State of Delaware without regard to any applicable conflicts of law principles, except to the extent that the federal laws of the United States shall be applicable hereto. EACH OF THE PARTIES HERETO WAIVES ANY RIGHT TO REQUEST A TRIAL BY JURY IN ANY LITIGATION WITH RESPECT TO THIS AGREEMENT AND REPRESENTS THAT COUNSEL HAS BEEN CONSULTED SPECIFICALLY AS TO THIS WAIVER.

Section 6.08 Severability. Whenever possible, each provision or portion of any provision of this Agreement shall be interpreted in such manner as to be effective and valid under applicable law, but if any provision or portion of any provision of this Agreement is held to be invalid, illegal or unenforceable in any respect under any applicable law or rule in any jurisdiction, such invalidity, illegality or unenforceability shall not affect any other provision or portion of any provision in such jurisdiction, and this Agreement shall be reformed, construed and enforced in such jurisdiction such that the invalid, illegal or unenforceable provision or portion thereof shall be interpreted to be only so broad as is enforceable.

Section 6.09 Assignment. Neither this Agreement nor any of the rights, interests or obligations hereunder shall be assigned by any of the parties hereto (whether by operation of law or otherwise) and any attempted assignment in contravention of this Section 6.09 shall be null and void. Subject to the preceding sentence, this Agreement will be binding upon, inure to the benefit of and be enforceable by the parties and their respective successors and assigns.

**IN WITNESS WHEREOF**, the parties hereto have caused this Agreement to be executed in counterparts by their duly authorized officers and attested by their officers thereunto duly authorized, all as of the day and year first above written.

**COMERICA BANK**



By: Curtis C. Farmer

Title: Chairman, President and Chief Executive Officer

**COMERICA BANK & TRUST, NATIONAL ASSOCIATION**



By: James J. Herzog

Title: Senior Executive Vice President and Chief Financial Officer

**FIFTH THIRD BANK, NATIONAL ASSOCIATION**

By:

Title:



**FIFTH THIRD BANK, NATIONAL  
ASSOCIATION**

A handwritten signature in black ink, appearing to read "Tim Spence", written over a horizontal line.

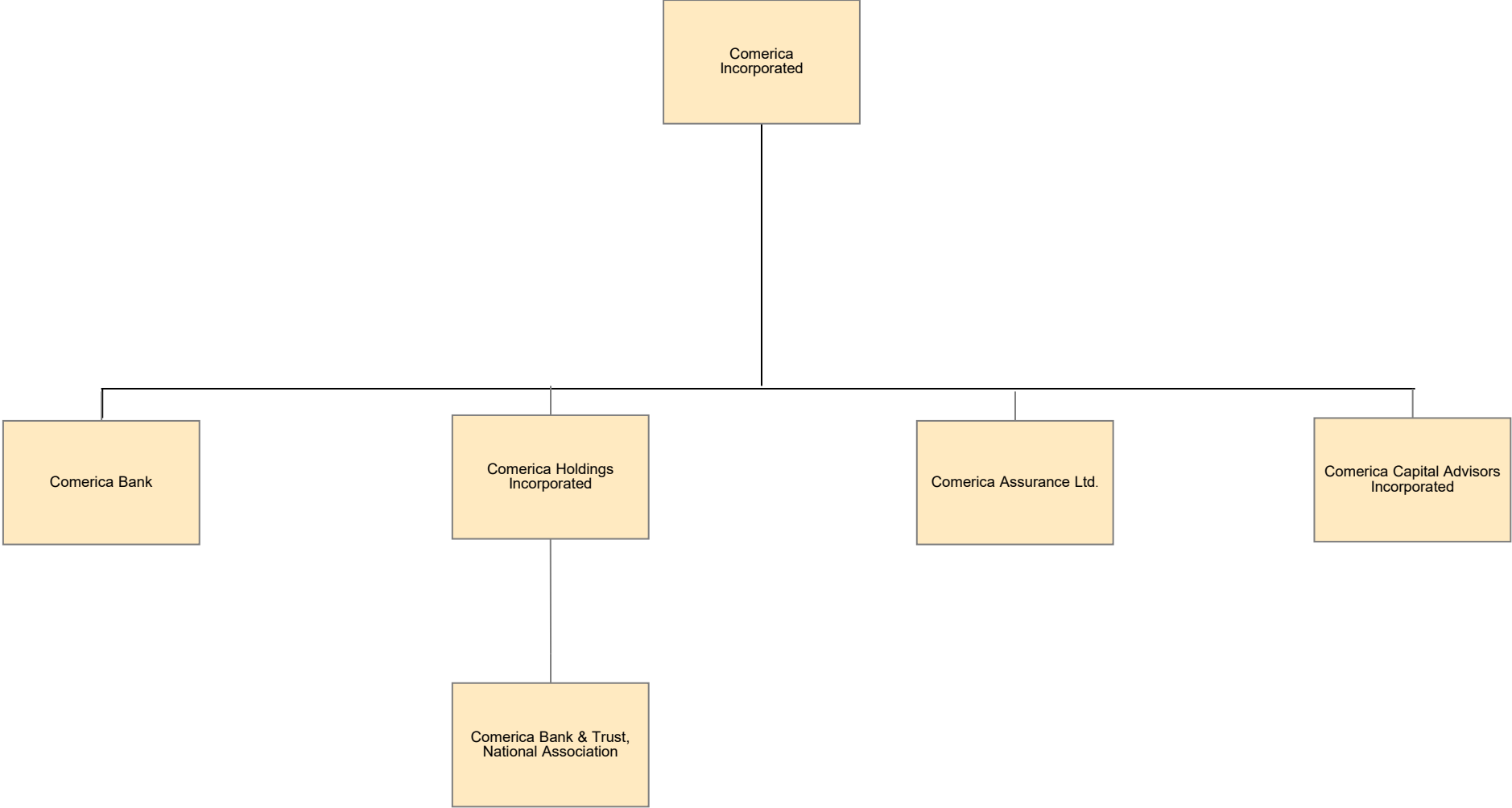
By: Timothy N. Spence

Title: President and Chief Executive Officer

**Public Exhibit 4**

**Organizational Chart of Comerica, Comerica Holdings, Comerica Bank and  
Comerica Bank & Trust**

Simplified Organizational Chart of Comerica (Current)



**Public Exhibit 5**

**Supplement to Competition Analysis**

## **Part A**

**Detroit, MI**



**Detroit, MI - FRB Banking Market**  
**DEPOSIT BASED HHI**  
**FRB Initial Screen \***

Ownership info as of Sep 29 2025

| Pre-Merger                        |                        |                                    |        |                 |                                           |        |                                              |                                    | Post-Merger    |                 |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|------------------------------------|--------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                        | Type   | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 6                                 |                        | Fifth Third Bancorp                | Bank   | 76              | 8,288,882                                 | 100    | 8,288,882                                    | 4.20                               | 17.64          |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 2                                 |                        | Comerica Inc.                      | Bank   | 118             | 33,666,287                                | 100    | 33,666,287                                   | 17.06                              | 291.00         |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
|                                   | 2                      | Fifth Third Bancorp                | Bank   |                 |                                           |        |                                              |                                    |                | 194             | 41,955,169                                | 41,955,169                                   | 21.26                              | 451.94         |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 1                      | JPMorgan Chase & Co.               | Bank   | 129             | 56,791,323                                | 100    | 56,791,323                                   | 28.78                              | 828.08         | 129             | 56,791,323                                | 56,791,323                                   | 28.78                              | 828.08         |
| 3                                 | 3                      | Bank of America Corp.              | Bank   | 64              | 29,899,670                                | 100    | 29,899,670                                   | 15.15                              | 229.53         | 64              | 29,899,670                                | 29,899,670                                   | 15.15                              | 229.53         |
| 4                                 | 4                      | Huntington Bancshares Inc.         | Bank   | 141             | 21,375,994                                | 100    | 21,375,994                                   | 10.83                              | 117.32         | 141             | 21,375,994                                | 21,375,994                                   | 10.83                              | 117.32         |
| 5                                 | 5                      | PNC Financial Services Group Inc.  | Bank   | 70              | 15,587,303                                | 100    | 15,587,303                                   | 7.90                               | 62.38          | 70              | 15,587,303                                | 15,587,303                                   | 7.90                               | 62.38          |
| 7                                 | 6                      | Citizens Financial Group Inc.      | Bank   | 65              | 6,584,680                                 | 100    | 6,584,680                                    | 3.34                               | 11.13          | 65              | 6,584,680                                 | 6,584,680                                    | 3.34                               | 11.13          |
| 8                                 | 7                      | Flagstar Financial Inc.****        | Bank   | 62              | 5,300,069                                 | 100    | 5,300,069                                    | 2.69                               | 7.21           | 62              | 5,300,069                                 | 5,300,069                                    | 2.69                               | 7.21           |
| 9                                 | 8                      | Arbor Bancorp Inc.                 | Bank   | 19              | 2,659,681                                 | 100    | 2,659,681                                    | 1.35                               | 1.82           | 19              | 2,659,681                                 | 2,659,681                                    | 1.35                               | 1.82           |
| 10                                | 9                      | First Merchants Corp.              | Bank   | 31              | 2,459,734                                 | 100    | 2,459,734                                    | 1.25                               | 1.55           | 31              | 2,459,734                                 | 2,459,734                                    | 1.25                               | 1.55           |
| 11                                | 10                     | ChoiceOne Financial Services Inc.  | Bank   | 27              | 1,956,755                                 | 100    | 1,956,755                                    | 0.99                               | 0.98           | 27              | 1,956,755                                 | 1,956,755                                    | 0.99                               | 0.98           |
| 12                                | 11                     | KeyCorp                            | Bank   | 19              | 1,517,505                                 | 100    | 1,517,505                                    | 0.77                               | 0.59           | 19              | 1,517,505                                 | 1,517,505                                    | 0.77                               | 0.59           |
| 13                                | 12                     | Canadian Imperial Bank of Commerce | Bank   | 1               | 1,380,712                                 | 100    | 1,380,712                                    | 0.70                               | 0.49           | 1               | 1,380,712                                 | 1,380,712                                    | 0.70                               | 0.49           |
| 14                                | 13                     | First State Financial Corp.        | Bank   | 11              | 1,168,433                                 | 100    | 1,168,433                                    | 0.59                               | 0.35           | 11              | 1,168,433                                 | 1,168,433                                    | 0.59                               | 0.35           |
| 15                                | 14                     | Independent Bank Corp.             | Bank   | 11              | 1,033,092                                 | 100    | 1,033,092                                    | 0.52                               | 0.27           | 11              | 1,033,092                                 | 1,033,092                                    | 0.52                               | 0.27           |
| 16                                | 15                     | Old National Bancorp               | Bank   | 10              | 949,647                                   | 100    | 949,647                                      | 0.48                               | 0.23           | 10              | 949,647                                   | 949,647                                      | 0.48                               | 0.23           |
| 17                                | 16                     | University Bancorp Inc.            | Bank   | 2               | 878,949                                   | 100    | 878,949                                      | 0.45                               | 0.20           | 2               | 878,949                                   | 878,949                                      | 0.45                               | 0.20           |
| 18                                | 17                     | Oxford Bank Corp.                  | Bank   | 8               | 733,757                                   | 100    | 733,757                                      | 0.37                               | 0.14           | 8               | 733,757                                   | 733,757                                      | 0.37                               | 0.14           |
| 19                                | 18                     | Mercantile Bank Corp.              | Bank   | 13              | 531,454                                   | 100    | 531,454                                      | 0.27                               | 0.07           | 13              | 531,454                                   | 531,454                                      | 0.27                               | 0.07           |
| 20                                | 19                     | Northstar Financial Group Inc.     | Bank   | 5               | 504,393                                   | 100    | 504,393                                      | 0.26                               | 0.07           | 5               | 504,393                                   | 504,393                                      | 0.26                               | 0.07           |
| 21                                | 20                     | Tri-County Bancorp Inc.            | Bank   | 10              | 497,886                                   | 100    | 497,886                                      | 0.25                               | 0.06           | 10              | 497,886                                   | 497,886                                      | 0.25                               | 0.06           |
| 22                                | 21                     | First Independence Corp.           | Bank   | 2               | 472,850                                   | 100    | 472,850                                      | 0.24                               | 0.06           | 2               | 472,850                                   | 472,850                                      | 0.24                               | 0.06           |
| 23                                | 22                     | WesBanco Inc.                      | Bank   | 5               | 437,497                                   | 100    | 437,497                                      | 0.22                               | 0.05           | 5               | 437,497                                   | 437,497                                      | 0.22                               | 0.05           |
| 24                                | 23                     | CSB Bancorp Inc.                   | Bank   | 3               | 356,982                                   | 100    | 356,982                                      | 0.18                               | 0.03           | 3               | 356,982                                   | 356,982                                      | 0.18                               | 0.03           |
| 25                                | 24                     | Citizens Bancshares Inc.           | Bank   | 2               | 312,668                                   | 100    | 312,668                                      | 0.16                               | 0.03           | 2               | 312,668                                   | 312,668                                      | 0.16                               | 0.03           |
| 26                                | 25                     | Waterford Bancorp Inc.             | Bank   | 2               | 268,091                                   | 100    | 268,091                                      | 0.14                               | 0.02           | 2               | 268,091                                   | 268,091                                      | 0.14                               | 0.02           |
| 27                                | 26                     | Mi Bancorp Inc.                    | Bank   | 2               | 228,354                                   | 100    | 228,354                                      | 0.12                               | 0.01           | 2               | 228,354                                   | 228,354                                      | 0.12                               | 0.01           |
| 28                                | 27                     | Huron Valley Bancorp Inc.          | Bank   | 3               | 224,563                                   | 100    | 224,563                                      | 0.11                               | 0.01           | 3               | 224,563                                   | 224,563                                      | 0.11                               | 0.01           |
| 29                                | 28                     | Horizon Bancorp Inc.               | Bank   | 3               | 210,580                                   | 100    | 210,580                                      | 0.11                               | 0.01           | 3               | 210,580                                   | 210,580                                      | 0.11                               | 0.01           |
| 30                                | 29                     | Thumb Bancorp Inc.                 | Bank   | 7               | 194,365                                   | 100    | 194,365                                      | 0.10                               | 0.01           | 7               | 194,365                                   | 194,365                                      | 0.10                               | 0.01           |
| 31                                | 30                     | CNB Community Bancorp Inc.         | Bank   | 3               | 182,061                                   | 100    | 182,061                                      | 0.09                               | 0.01           | 3               | 182,061                                   | 182,061                                      | 0.09                               | 0.01           |
| 32                                | 31                     | Northern Trust Corp.               | Bank   | 1               | 164,613                                   | 100    | 164,613                                      | 0.08                               | 0.01           | 1               | 164,613                                   | 164,613                                      | 0.08                               | 0.01           |
| 33                                | 32                     | Keweenaw Financial Corp.           | Bank   | 4               | 125,185                                   | 100    | 125,185                                      | 0.06                               | 0.00           | 4               | 125,185                                   | 125,185                                      | 0.06                               | 0.00           |
| 34                                | 33                     | Blissfield Bank Corp.              | Bank   | 1               | 105,252                                   | 100    | 105,252                                      | 0.05                               | 0.00           | 1               | 105,252                                   | 105,252                                      | 0.05                               | 0.00           |
| 35                                | 34                     | Dearborn FSB                       | Thrift | 5               | 172,210                                   | 50     | 86,105                                       | 0.04                               | 0.00           | 5               | 172,210                                   | 86,105                                       | 0.04                               | 0.00           |
| 36                                | 35                     | Bank Michigan Financial Corp.      | Bank   | 2               | 56,275                                    | 100    | 56,275                                       | 0.03                               | 0.00           | 2               | 56,275                                    | 56,275                                       | 0.03                               | 0.00           |
| 37                                | 36                     | Farmers & Merchants Bancorp Inc.   | Bank   | 2               | 56,174                                    | 100    | 56,174                                       | 0.03                               | 0.00           | 2               | 56,174                                    | 56,174                                       | 0.03                               | 0.00           |
| 38                                | 37                     | Community Unity Bank               | Bank   | 1               | 51,606                                    | 100    | 51,606                                       | 0.03                               | 0.00           | 1               | 51,606                                    | 51,606                                       | 0.03                               | 0.00           |
| 39                                | 38                     | Liberty Financial Services Inc.    | Bank   | 1               | 42,863                                    | 100    | 42,863                                       | 0.02                               | 0.00           | 1               | 42,863                                    | 42,863                                       | 0.02                               | 0.00           |
| 40                                | 39                     | Harbor Springs Financial Corp.     | Bank   | 1               | 11,472                                    | 100    | 11,472                                       | 0.01                               | 0.00           | 1               | 11,472                                    | 11,472                                       | 0.01                               | 0.00           |
| 41                                | 40                     | Dart Financial Corp.               | Bank   | 4               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 4               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 42                                | 41                     | M&T Bank Corp.                     | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |

## Detroit, MI - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre<br>Merger<br>Rank | Post<br>Merger<br>Rank | Institution                        | Type | Pre-Merger      |                                           |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------|------------------------|------------------------------------|------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
|                       |                        |                                    |      | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| 43                    | 42                     | Milestone Bank                     | Bank | 1               | 0                                         | 100                                          | 0                                  | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 44                    | 43                     | Wells Fargo & Co.                  | Bank | 1               | 0                                         | 100                                          | 0                                  | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 45                    | 44                     | A.B.D. FCU                         | CU   | 2               | 38,260                                    | 0                                            | 0                                  | 0.00           | 2               | 38,260                                    | 0                                            | 0.00                               | 0.00           |
| 46                    | 45                     | Advantage One CU                   | CU   | 2               | 150,834                                   | 0                                            | 0                                  | 0.00           | 2               | 150,834                                   | 0                                            | 0.00                               | 0.00           |
| 47                    | 46                     | Advia CU                           | CU   | 7               | 696,325                                   | 0                                            | 0                                  | 0.00           | 7               | 696,325                                   | 0                                            | 0.00                               | 0.00           |
| 48                    | 47                     | Alliance Catholic CU               | CU   | 12              | 567,079                                   | 0                                            | 0                                  | 0.00           | 12              | 567,079                                   | 0                                            | 0.00                               | 0.00           |
| 49                    | 48                     | Alloya Corporate FCU               | CU   | 1               | 3,189,524                                 | 0                                            | 0                                  | 0.00           | 1               | 3,189,524                                 | 0                                            | 0.00                               | 0.00           |
| 50                    | 49                     | American 1 CU                      | CU   | 4               | 129,522                                   | 0                                            | 0                                  | 0.00           | 4               | 129,522                                   | 0                                            | 0.00                               | 0.00           |
| 51                    | 50                     | Blue Water FCU                     | CU   | 1               | 15,094                                    | 0                                            | 0                                  | 0.00           | 1               | 15,094                                    | 0                                            | 0.00                               | 0.00           |
| 52                    | 51                     | Chief Financial FCU                | CU   | 5               | 212,394                                   | 0                                            | 0                                  | 0.00           | 5               | 212,394                                   | 0                                            | 0.00                               | 0.00           |
| 53                    | 52                     | Chiropractic FCU                   | CU   | 1               | 35,630                                    | 0                                            | 0                                  | 0.00           | 1               | 35,630                                    | 0                                            | 0.00                               | 0.00           |
| 54                    | 53                     | Christian Financial CU             | CU   | 13              | 925,907                                   | 0                                            | 0                                  | 0.00           | 13              | 925,907                                   | 0                                            | 0.00                               | 0.00           |
| 55                    | 54                     | Community Choice CU                | CU   | 17              | 1,202,638                                 | 0                                            | 0                                  | 0.00           | 17              | 1,202,638                                 | 0                                            | 0.00                               | 0.00           |
| 56                    | 55                     | Community Financial CU             | CU   | 8               | 893,875                                   | 0                                            | 0                                  | 0.00           | 8               | 893,875                                   | 0                                            | 0.00                               | 0.00           |
| 57                    | 56                     | Community Focus FCU                | CU   | 1               | 55,436                                    | 0                                            | 0                                  | 0.00           | 1               | 55,436                                    | 0                                            | 0.00                               | 0.00           |
| 58                    | 57                     | Construction FCU                   | CU   | 1               | 21,102                                    | 0                                            | 0                                  | 0.00           | 1               | 21,102                                    | 0                                            | 0.00                               | 0.00           |
| 59                    | 58                     | Cornerstone Community FCU          | CU   | 6               | 254,453                                   | 0                                            | 0                                  | 0.00           | 6               | 254,453                                   | 0                                            | 0.00                               | 0.00           |
| 60                    | 59                     | CU 1                               | CU   | 1               | 57,966                                    | 0                                            | 0                                  | 0.00           | 1               | 57,966                                    | 0                                            | 0.00                               | 0.00           |
| 61                    | 60                     | CU ONE                             | CU   | 15              | 1,381,026                                 | 0                                            | 0                                  | 0.00           | 15              | 1,381,026                                 | 0                                            | 0.00                               | 0.00           |
| 62                    | 61                     | DFCU Financial                     | CU   | 21              | 3,728,631                                 | 0                                            | 0                                  | 0.00           | 21              | 3,728,631                                 | 0                                            | 0.00                               | 0.00           |
| 63                    | 62                     | Directions CU                      | CU   | 3               | 151,944                                   | 0                                            | 0                                  | 0.00           | 3               | 151,944                                   | 0                                            | 0.00                               | 0.00           |
| 64                    | 63                     | Diversified Members CU             | CU   | 4               | 425,462                                   | 0                                            | 0                                  | 0.00           | 4               | 425,462                                   | 0                                            | 0.00                               | 0.00           |
| 65                    | 64                     | Dort Financial CU                  | CU   | 12              | 1,502,436                                 | 0                                            | 0                                  | 0.00           | 12              | 1,502,436                                 | 0                                            | 0.00                               | 0.00           |
| 66                    | 65                     | Downriver Community FCU            | CU   | 3               | 178,538                                   | 0                                            | 0                                  | 0.00           | 3               | 178,538                                   | 0                                            | 0.00                               | 0.00           |
| 67                    | 66                     | Electrical Workers Local 58 CU     | CU   | 1               | 18,669                                    | 0                                            | 0                                  | 0.00           | 1               | 18,669                                    | 0                                            | 0.00                               | 0.00           |
| 68                    | 67                     | ELGA CU                            | CU   | 13              | 975,739                                   | 0                                            | 0                                  | 0.00           | 13              | 975,739                                   | 0                                            | 0.00                               | 0.00           |
| 69                    | 68                     | Extra CU                           | CU   | 2               | 280,766                                   | 0                                            | 0                                  | 0.00           | 2               | 280,766                                   | 0                                            | 0.00                               | 0.00           |
| 70                    | 69                     | Financial Plus CU                  | CU   | 7               | 715,343                                   | 0                                            | 0                                  | 0.00           | 7               | 715,343                                   | 0                                            | 0.00                               | 0.00           |
| 71                    | 70                     | Flagship Community FCU             | CU   | 1               | 15,644                                    | 0                                            | 0                                  | 0.00           | 1               | 15,644                                    | 0                                            | 0.00                               | 0.00           |
| 72                    | 71                     | Frankenmuth CU                     | CU   | 2               | 93,710                                    | 0                                            | 0                                  | 0.00           | 2               | 93,710                                    | 0                                            | 0.00                               | 0.00           |
| 73                    | 72                     | FreeStar Financial CU              | CU   | 8               | 297,796                                   | 0                                            | 0                                  | 0.00           | 8               | 297,796                                   | 0                                            | 0.00                               | 0.00           |
| 74                    | 73                     | Genisys CU                         | CU   | 28              | 3,977,773                                 | 0                                            | 0                                  | 0.00           | 28              | 3,977,773                                 | 0                                            | 0.00                               | 0.00           |
| 75                    | 74                     | I.M. Detroit District CU           | CU   | 1               | 1,666                                     | 0                                            | 0                                  | 0.00           | 1               | 1,666                                     | 0                                            | 0.00                               | 0.00           |
| 76                    | 75                     | Ignite Credit Union                | CU   | 2               | 50,847                                    | 0                                            | 0                                  | 0.00           | 2               | 50,847                                    | 0                                            | 0.00                               | 0.00           |
| 77                    | 76                     | International UAW FCU              | CU   | 2               | 18,530                                    | 0                                            | 0                                  | 0.00           | 2               | 18,530                                    | 0                                            | 0.00                               | 0.00           |
| 78                    | 77                     | InTouch CU                         | CU   | 4               | 195,578                                   | 0                                            | 0                                  | 0.00           | 4               | 195,578                                   | 0                                            | 0.00                               | 0.00           |
| 79                    | 78                     | LAFCU                              | CU   | 2               | 183,593                                   | 0                                            | 0                                  | 0.00           | 2               | 183,593                                   | 0                                            | 0.00                               | 0.00           |
| 80                    | 79                     | Lake Michigan CU                   | CU   | 7               | 1,219,419                                 | 0                                            | 0                                  | 0.00           | 7               | 1,219,419                                 | 0                                            | 0.00                               | 0.00           |
| 81                    | 80                     | Lake Trust CU                      | CU   | 12              | 1,253,589                                 | 0                                            | 0                                  | 0.00           | 12              | 1,253,589                                 | 0                                            | 0.00                               | 0.00           |
| 82                    | 81                     | Lenco CU                           | CU   | 2               | 119,712                                   | 0                                            | 0                                  | 0.00           | 2               | 119,712                                   | 0                                            | 0.00                               | 0.00           |
| 83                    | 82                     | Lincoln Park Community CU          | CU   | 1               | 54,969                                    | 0                                            | 0                                  | 0.00           | 1               | 54,969                                    | 0                                            | 0.00                               | 0.00           |
| 84                    | 83                     | LOC Credit Union                   | CU   | 6               | 414,155                                   | 0                                            | 0                                  | 0.00           | 6               | 414,155                                   | 0                                            | 0.00                               | 0.00           |
| 85                    | 84                     | Local CU                           | CU   | 1               | 89,384                                    | 0                                            | 0                                  | 0.00           | 1               | 89,384                                    | 0                                            | 0.00                               | 0.00           |
| 86                    | 85                     | Michigan Columbus FCU              | CU   | 2               | 63,596                                    | 0                                            | 0                                  | 0.00           | 2               | 63,596                                    | 0                                            | 0.00                               | 0.00           |
| 87                    | 86                     | Michigan Educational CU            | CU   | 6               | 959,583                                   | 0                                            | 0                                  | 0.00           | 6               | 959,583                                   | 0                                            | 0.00                               | 0.00           |
| 88                    | 87                     | Michigan First CU                  | CU   | 23              | 813,899                                   | 0                                            | 0                                  | 0.00           | 23              | 813,899                                   | 0                                            | 0.00                               | 0.00           |
| 89                    | 88                     | Michigan Legacy CU                 | CU   | 5               | 191,532                                   | 0                                            | 0                                  | 0.00           | 5               | 191,532                                   | 0                                            | 0.00                               | 0.00           |
| 90                    | 89                     | Michigan Schools and Government CU | CU   | 24              | 3,445,268                                 | 0                                            | 0                                  | 0.00           | 24              | 3,445,268                                 | 0                                            | 0.00                               | 0.00           |
| 91                    | 90                     | Michigan State University FCU      | CU   | 8               | 1,504,909                                 | 0                                            | 0                                  | 0.00           | 8               | 1,504,909                                 | 0                                            | 0.00                               | 0.00           |
| 92                    | 91                     | Michigan United CU                 | CU   | 9               | 294,098                                   | 0                                            | 0                                  | 0.00           | 9               | 294,098                                   | 0                                            | 0.00                               | 0.00           |

## Detroit, MI - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre<br>Merger<br>Rank | Post<br>Merger<br>Rank | Institution                            | Type | Pre-Merger      |                                           |                                              |                                    |                 | Post-Merger     |                                           |                                              |                                    |                 |
|-----------------------|------------------------|----------------------------------------|------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|-----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|-----------------|
|                       |                        |                                        |      | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI  | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI  |
| 93                    | 92                     | Monroe Community CU                    | CU   | 6               | 346,877                                   | 0                                            | 0                                  | 0.00            | 6               | 346,877                                   | 0                                            | 0.00                               | 0.00            |
| 94                    | 93                     | New Rising Star FCU                    | CU   | 1               | 7                                         | 0                                            | 0                                  | 0.00            | 1               | 7                                         | 0                                            | 0.00                               | 0.00            |
| 95                    | 94                     | One Detroit CU                         | CU   | 4               | 48,426                                    | 0                                            | 0                                  | 0.00            | 4               | 48,426                                    | 0                                            | 0.00                               | 0.00            |
| 96                    | 95                     | OUR CU                                 | CU   | 5               | 337,954                                   | 0                                            | 0                                  | 0.00            | 5               | 337,954                                   | 0                                            | 0.00                               | 0.00            |
| 97                    | 96                     | PARDA FCU                              | CU   | 3               | 70,044                                    | 0                                            | 0                                  | 0.00            | 3               | 70,044                                    | 0                                            | 0.00                               | 0.00            |
| 98                    | 97                     | People Driven CU                       | CU   | 5               | 421,909                                   | 0                                            | 0                                  | 0.00            | 5               | 421,909                                   | 0                                            | 0.00                               | 0.00            |
| 99                    | 98                     | PFCU                                   | CU   | 5               | 305,394                                   | 0                                            | 0                                  | 0.00            | 5               | 305,394                                   | 0                                            | 0.00                               | 0.00            |
| 100                   | 99                     | Polish-American FCU                    | CU   | 2               | 152,618                                   | 0                                            | 0                                  | 0.00            | 2               | 152,618                                   | 0                                            | 0.00                               | 0.00            |
| 101                   | 100                    | Public Service CU                      | CU   | 11              | 372,118                                   | 0                                            | 0                                  | 0.00            | 11              | 372,118                                   | 0                                            | 0.00                               | 0.00            |
| 102                   | 101                    | Security CU                            | CU   | 12              | 484,432                                   | 0                                            | 0                                  | 0.00            | 12              | 484,432                                   | 0                                            | 0.00                               | 0.00            |
| 103                   | 102                    | Selfreliance FCU                       | CU   | 3               | 178,639                                   | 0                                            | 0                                  | 0.00            | 3               | 178,639                                   | 0                                            | 0.00                               | 0.00            |
| 104                   | 103                    | Shore to Shore Community FCU           | CU   | 2               | 73,965                                    | 0                                            | 0                                  | 0.00            | 2               | 73,965                                    | 0                                            | 0.00                               | 0.00            |
| 105                   | 104                    | Southeast Michigan State Employees FCU | CU   | 1               | 45,730                                    | 0                                            | 0                                  | 0.00            | 1               | 45,730                                    | 0                                            | 0.00                               | 0.00            |
| 106                   | 105                    | Sovita CU                              | CU   | 5               | 474,413                                   | 0                                            | 0                                  | 0.00            | 5               | 474,413                                   | 0                                            | 0.00                               | 0.00            |
| 107                   | 106                    | Tandem FCU                             | CU   | 1               | 20,136                                    | 0                                            | 0                                  | 0.00            | 1               | 20,136                                    | 0                                            | 0.00                               | 0.00            |
| 108                   | 107                    | Team One CU                            | CU   | 3               | 186,715                                   | 0                                            | 0                                  | 0.00            | 3               | 186,715                                   | 0                                            | 0.00                               | 0.00            |
| 109                   | 108                    | TLC Community CU                       | CU   | 8               | 712,380                                   | 0                                            | 0                                  | 0.00            | 8               | 712,380                                   | 0                                            | 0.00                               | 0.00            |
| 110                   | 109                    | Total Community CU                     | CU   | 1               | 90,364                                    | 0                                            | 0                                  | 0.00            | 1               | 90,364                                    | 0                                            | 0.00                               | 0.00            |
| 111                   | 110                    | TRUE Community CU                      | CU   | 6               | 317,122                                   | 0                                            | 0                                  | 0.00            | 6               | 317,122                                   | 0                                            | 0.00                               | 0.00            |
| 112                   | 111                    | Ukrainian Selfreliance Michigan FCU    | CU   | 2               | 116,046                                   | 0                                            | 0                                  | 0.00            | 2               | 116,046                                   | 0                                            | 0.00                               | 0.00            |
| 113                   | 112                    | UNIFY Financial FCU                    | CU   | 2               | 133,260                                   | 0                                            | 0                                  | 0.00            | 2               | 133,260                                   | 0                                            | 0.00                               | 0.00            |
| 114                   | 113                    | United Churches CU                     | CU   | 1               | 19,730                                    | 0                                            | 0                                  | 0.00            | 1               | 19,730                                    | 0                                            | 0.00                               | 0.00            |
| 115                   | 114                    | University of Michigan CU              | CU   | 14              | 1,073,836                                 | 0                                            | 0                                  | 0.00            | 14              | 1,073,836                                 | 0                                            | 0.00                               | 0.00            |
| 116                   | 115                    | Vibe CU                                | CU   | 15              | 1,207,423                                 | 0                                            | 0                                  | 0.00            | 15              | 1,207,423                                 | 0                                            | 0.00                               | 0.00            |
| 117                   | 116                    | Walled Lake Schools FCU                | CU   | 1               | 118,511                                   | 0                                            | 0                                  | 0.00            | 1               | 118,511                                   | 0                                            | 0.00                               | 0.00            |
| 118                   | 117                    | Warren Municipal FCU                   | CU   | 1               | 18,947                                    | 0                                            | 0                                  | 0.00            | 1               | 18,947                                    | 0                                            | 0.00                               | 0.00            |
| 119                   | 118                    | Wayne-Westland FCU                     | CU   | 1               | 139,488                                   | 0                                            | 0                                  | 0.00            | 1               | 139,488                                   | 0                                            | 0.00                               | 0.00            |
| 120                   | 119                    | Westacres CU                           | CU   | 1               | 5,887                                     | 0                                            | 0                                  | 0.00            | 1               | 5,887                                     | 0                                            | 0.00                               | 0.00            |
| 121                   | 120                    | Wings Financial CU                     | CU   | 2               | 433,063                                   | 0                                            | 0                                  | 0.00            | 2               | 433,063                                   | 0                                            | 0.00                               | 0.00            |
| 122                   | 121                    | Zeal CU                                | CU   | 14              | 690,210                                   | 0                                            | 0                                  | 0.00            | 14              | 690,210                                   | 0                                            | 0.00                               | 0.00            |
| <b>TOTALS:</b>        |                        |                                        |      | <b>1,406</b>    | <b>239,099,354</b>                        | <b>197,353,762</b>                           | <b>100.00</b>                      | <b>1,571.38</b> | <b>1,406</b>    | <b>239,099,354</b>                        | <b>197,353,762</b>                           | <b>100.00</b>                      | <b>1,714.68</b> |

PRE-MERGER HHI: 1,571  
 POST-MERGER HHI: 1,715  
 HHI CHANGE: 143

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.
- \*\* Pro Forma Ownership assumes that announced transactions have been completed.
- \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.
- \*\*\*\* Deposit estimates for Flagstar reflects Flagstar's closure of several branches in the Detroit market in early 2025.

**Grand Rapids, MI**

## Grand Rapids, MI - FRB Banking Market

Ownership info as of Sep 29 2025

## DEPOSIT BASED HHI

## FRB Initial Screen \*

| Pre-Merger                        |                        |                                     |        |                 |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|-------------------------------------|--------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                         | Type   | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 2                                 |                        | Fifth Third Bancorp                 | Bank   | 45              | 6,307,605                                 | 100    | 6,307,605                                    | 16.61                              | 276.04         |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 12                                |                        | Comerica Inc.                       | Bank   | 11              | 856,281                                   | 100    | 856,281                                      | 2.26                               | 5.09           |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 |                        | Fifth Third Bancorp                 | Bank   |                 |                                           |        |                                              |                                    |                | 56              | 7,163,886                                 | 7,163,886                                    | 18.87                              | 356.07         |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 2                      | Huntington Bancshares Inc.          | Bank   | 50              | 7,033,928                                 | 100    | 7,033,928                                    | 18.53                              | 343.27         | 50              | 7,033,928                                 | 7,033,928                                    | 18.53                              | 343.27         |
| 3                                 | 3                      | Northpointe Bancshares Inc.         | Bank   | 1               | 4,497,059                                 | 100    | 4,497,059                                    | 11.85                              | 140.31         | 1               | 4,497,059                                 | 4,497,059                                    | 11.85                              | 140.31         |
| 4                                 | 4                      | Wintrust Financial Corp.            | Bank   | 29              | 2,925,597                                 | 100    | 2,925,597                                    | 7.71                               | 59.38          | 29              | 2,925,597                                 | 2,925,597                                    | 7.71                               | 59.38          |
| 5                                 | 5                      | JPMorgan Chase & Co.                | Bank   | 24              | 2,924,370                                 | 100    | 2,924,370                                    | 7.70                               | 59.33          | 24              | 2,924,370                                 | 2,924,370                                    | 7.70                               | 59.33          |
| 6                                 | 6                      | Mercantile Bank Corp.               | Bank   | 15              | 2,538,309                                 | 100    | 2,538,309                                    | 6.69                               | 44.70          | 15              | 2,538,309                                 | 2,538,309                                    | 6.69                               | 44.70          |
| 7                                 | 7                      | Independent Bank Corp.              | Bank   | 21              | 1,599,519                                 | 100    | 1,599,519                                    | 4.21                               | 17.75          | 21              | 1,599,519                                 | 1,599,519                                    | 4.21                               | 17.75          |
| 8                                 | 8                      | ChoiceOne Financial Services Inc.   | Bank   | 19              | 1,372,254                                 | 100    | 1,372,254                                    | 3.61                               | 13.07          | 19              | 1,372,254                                 | 1,372,254                                    | 3.61                               | 13.07          |
| 9                                 | 9                      | PNC Financial Services Group Inc.   | Bank   | 22              | 1,365,672                                 | 100    | 1,365,672                                    | 3.60                               | 12.94          | 22              | 1,365,672                                 | 1,365,672                                    | 3.60                               | 12.94          |
| 10                                | 10                     | Northstar Financial Group Inc.      | Bank   | 9               | 929,791                                   | 100    | 929,791                                      | 2.45                               | 6.00           | 9               | 929,791                                   | 929,791                                      | 2.45                               | 6.00           |
| 11                                | 11                     | United Bank Financial Corp.         | Bank   | 13              | 863,664                                   | 100    | 863,664                                      | 2.27                               | 5.18           | 13              | 863,664                                   | 863,664                                      | 2.27                               | 5.18           |
| 13                                | 12                     | Bank of America Corp.               | Bank   | 7               | 774,923                                   | 100    | 774,923                                      | 2.04                               | 4.17           | 7               | 774,923                                   | 774,923                                      | 2.04                               | 4.17           |
| 14                                | 13                     | HCB Financial Corp.                 | Bank   | 5               | 539,275                                   | 100    | 539,275                                      | 1.42                               | 2.02           | 5               | 539,275                                   | 539,275                                      | 1.42                               | 2.02           |
| 15                                | 14                     | Flagstar Financial Inc.             | Bank   | 7               | 495,064                                   | 100    | 495,064                                      | 1.30                               | 1.70           | 7               | 495,064                                   | 495,064                                      | 1.30                               | 1.70           |
| 16                                | 15                     | Isabella Bank Corp.                 | Bank   | 8               | 446,212                                   | 100    | 446,212                                      | 1.18                               | 1.38           | 8               | 446,212                                   | 446,212                                      | 1.18                               | 1.38           |
| 17                                | 16                     | Grand River Commerce Inc.           | Bank   | 2               | 431,027                                   | 100    | 431,027                                      | 1.14                               | 1.29           | 2               | 431,027                                   | 431,027                                      | 1.14                               | 1.29           |
| 18                                | 17                     | Old National Bancorp                | Bank   | 4               | 388,472                                   | 100    | 388,472                                      | 1.02                               | 1.05           | 4               | 388,472                                   | 388,472                                      | 1.02                               | 1.05           |
| 19                                | 18                     | Shelby Financial Corp.              | Bank   | 8               | 291,180                                   | 100    | 291,180                                      | 0.77                               | 0.59           | 8               | 291,180                                   | 291,180                                      | 0.77                               | 0.59           |
| 20                                | 19                     | Horizon Bancorp Inc.                | Bank   | 4               | 258,090                                   | 100    | 258,090                                      | 0.68                               | 0.46           | 4               | 258,090                                   | 258,090                                      | 0.68                               | 0.46           |
| 21                                | 20                     | First National Bancshares Inc.      | Bank   | 1               | 225,389                                   | 100    | 225,389                                      | 0.59                               | 0.35           | 1               | 225,389                                   | 225,389                                      | 0.59                               | 0.35           |
| 22                                | 21                     | Union Financial Corp.               | Bank   | 5               | 175,010                                   | 100    | 175,010                                      | 0.46                               | 0.21           | 5               | 175,010                                   | 175,010                                      | 0.46                               | 0.21           |
| 23                                | 22                     | First National Bancorp Inc.         | Bank   | 2               | 163,319                                   | 100    | 163,319                                      | 0.43                               | 0.19           | 2               | 163,319                                   | 163,319                                      | 0.43                               | 0.19           |
| 24                                | 23                     | Lake Financial Corp.                | Bank   | 6               | 136,472                                   | 100    | 136,472                                      | 0.36                               | 0.13           | 6               | 136,472                                   | 136,472                                      | 0.36                               | 0.13           |
| 25                                | 24                     | Sidney Bancorp                      | Bank   | 3               | 132,134                                   | 100    | 132,134                                      | 0.35                               | 0.12           | 3               | 132,134                                   | 132,134                                      | 0.35                               | 0.12           |
| 26                                | 25                     | Commercial National Financial Corp. | Bank   | 3               | 81,873                                    | 100    | 81,873                                       | 0.22                               | 0.05           | 3               | 81,873                                    | 81,873                                       | 0.22                               | 0.05           |
| 27                                | 26                     | First Merchants Corp.               | Bank   | 1               | 65,748                                    | 100    | 65,748                                       | 0.17                               | 0.03           | 1               | 65,748                                    | 65,748                                       | 0.17                               | 0.03           |
| 28                                | 27                     | Harbor Springs Financial Corp.      | Bank   | 1               | 47,191                                    | 100    | 47,191                                       | 0.12                               | 0.02           | 1               | 47,191                                    | 47,191                                       | 0.12                               | 0.02           |
| 29                                | 28                     | Northern Trust Corp.                | Bank   | 1               | 44,467                                    | 100    | 44,467                                       | 0.12                               | 0.01           | 1               | 44,467                                    | 44,467                                       | 0.12                               | 0.01           |
| 30                                | 29                     | West Shore Bank Corp.               | Bank   | 1               | 42,189                                    | 100    | 42,189                                       | 0.11                               | 0.01           | 1               | 42,189                                    | 42,189                                       | 0.11                               | 0.01           |
| 31                                | 30                     | Eaton Federal Mutual Holding Co.    | Thrift | 1               | 24,919                                    | 50     | 12,460                                       | 0.03                               | 0.00           | 1               | 24,919                                    | 12,460                                       | 0.03                               | 0.00           |
| 32                                | 31                     | Dart Financial Corp.                | Bank   | 2               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 2               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 33                                | 32                     | 4Front CU                           | CU     | 3               | 133,563                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 133,563                                   | 0                                            | 0.00                               | 0.00           |
| 34                                | 33                     | AAC Credit Union                    | CU     | 7               | 136,590                                   | 0      | 0                                            | 0.00                               | 0.00           | 7               | 136,590                                   | 0                                            | 0.00                               | 0.00           |
| 35                                | 34                     | Adventure CU                        | CU     | 6               | 304,435                                   | 0      | 0                                            | 0.00                               | 0.00           | 6               | 304,435                                   | 0                                            | 0.00                               | 0.00           |
| 36                                | 35                     | Advia CU                            | CU     | 1               | 99,475                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 99,475                                    | 0                                            | 0.00                               | 0.00           |
| 37                                | 36                     | Arbor Financial CU                  | CU     | 4               | 258,170                                   | 0      | 0                                            | 0.00                               | 0.00           | 4               | 258,170                                   | 0                                            | 0.00                               | 0.00           |
| 38                                | 37                     | Best FCU                            | CU     | 2               | 117,375                                   | 0      | 0                                            | 0.00                               | 0.00           | 2               | 117,375                                   | 0                                            | 0.00                               | 0.00           |
| 39                                | 38                     | Community Choice CU                 | CU     | 3               | 212,230                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 212,230                                   | 0                                            | 0.00                               | 0.00           |
| 40                                | 39                     | Community First FCU                 | CU     | 4               | 133,952                                   | 0      | 0                                            | 0.00                               | 0.00           | 4               | 133,952                                   | 0                                            | 0.00                               | 0.00           |
| 41                                | 40                     | Community West CU                   | CU     | 5               | 228,691                                   | 0      | 0                                            | 0.00                               | 0.00           | 5               | 228,691                                   | 0                                            | 0.00                               | 0.00           |
| 42                                | 41                     | Compass CU                          | CU     | 2               | 95,133                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 95,133                                    | 0                                            | 0.00                               | 0.00           |

## Grand Rapids, MI - FRB Banking Market

Ownership info as of Sep 29 2025

## DEPOSIT BASED HHI

## FRB Initial Screen \*

| Pre<br>Merger<br>Rank | Post<br>Merger<br>Rank | Institution                            | Type | Pre-Merger      |                                |        |                                   |                             |                | Post-Merger     |                                |                                   |                             |                |
|-----------------------|------------------------|----------------------------------------|------|-----------------|--------------------------------|--------|-----------------------------------|-----------------------------|----------------|-----------------|--------------------------------|-----------------------------------|-----------------------------|----------------|
|                       |                        |                                        |      | Branch<br>Count | Total<br>Deposits<br>in Market | Weight | Weighted<br>Deposits in<br>Market | Weighted<br>Market<br>Share | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market | Weighted<br>Deposits in<br>Market | Weighted<br>Market<br>Share | Deposit<br>HHI |
|                       |                        |                                        |      |                 | (\$000)                        |        | (\$000)                           | (%)                         |                |                 | (\$000)                        | (\$000)                           | (%)                         |                |
| 43                    | 42                     | Consumers CU                           | CU   | 11              | 704,293                        | 0      | 0                                 | 0.00                        | 0.00           | 11              | 704,293                        | 0                                 | 0.00                        | 0.00           |
| 44                    | 43                     | CU ONE                                 | CU   | 1               | 92,068                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 92,068                         | 0                                 | 0.00                        | 0.00           |
| 45                    | 44                     | DFCU Financial                         | CU   | 4               | 710,216                        | 0      | 0                                 | 0.00                        | 0.00           | 4               | 710,216                        | 0                                 | 0.00                        | 0.00           |
| 46                    | 45                     | Family Financial CU                    | CU   | 4               | 141,074                        | 0      | 0                                 | 0.00                        | 0.00           | 4               | 141,074                        | 0                                 | 0.00                        | 0.00           |
| 47                    | 46                     | Farmers Insurance Federal Credit Union | CU   | 2               | 242,175                        | 0      | 0                                 | 0.00                        | 0.00           | 2               | 242,175                        | 0                                 | 0.00                        | 0.00           |
| 48                    | 47                     | Gerber FCU                             | CU   | 3               | 223,601                        | 0      | 0                                 | 0.00                        | 0.00           | 3               | 223,601                        | 0                                 | 0.00                        | 0.00           |
| 49                    | 48                     | GR Consumers CU                        | CU   | 2               | 41,097                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 41,097                         | 0                                 | 0.00                        | 0.00           |
| 50                    | 49                     | HarborLight CU                         | CU   | 2               | 145,138                        | 0      | 0                                 | 0.00                        | 0.00           | 2               | 145,138                        | 0                                 | 0.00                        | 0.00           |
| 51                    | 50                     | Honor CU                               | CU   | 5               | 265,671                        | 0      | 0                                 | 0.00                        | 0.00           | 5               | 265,671                        | 0                                 | 0.00                        | 0.00           |
| 52                    | 51                     | Ignite Credit Union                    | CU   | 5               | 127,117                        | 0      | 0                                 | 0.00                        | 0.00           | 5               | 127,117                        | 0                                 | 0.00                        | 0.00           |
| 53                    | 52                     | Intandem CU                            | CU   | 2               | 62,536                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 62,536                         | 0                                 | 0.00                        | 0.00           |
| 54                    | 53                     | Kellogg Community CU                   | CU   | 2               | 109,882                        | 0      | 0                                 | 0.00                        | 0.00           | 2               | 109,882                        | 0                                 | 0.00                        | 0.00           |
| 55                    | 54                     | Kenowa Community FCU                   | CU   | 1               | 25,624                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 25,624                         | 0                                 | 0.00                        | 0.00           |
| 56                    | 55                     | Lake Michigan CU                       | CU   | 36              | 6,271,296                      | 0      | 0                                 | 0.00                        | 0.00           | 36              | 6,271,296                      | 0                                 | 0.00                        | 0.00           |
| 57                    | 56                     | Lake Trust CU                          | CU   | 3               | 313,397                        | 0      | 0                                 | 0.00                        | 0.00           | 3               | 313,397                        | 0                                 | 0.00                        | 0.00           |
| 58                    | 57                     | Lakeshore FCU                          | CU   | 1               | 38,893                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 38,893                         | 0                                 | 0.00                        | 0.00           |
| 59                    | 58                     | Meijer CU                              | CU   | 2               | 100,770                        | 0      | 0                                 | 0.00                        | 0.00           | 2               | 100,770                        | 0                                 | 0.00                        | 0.00           |
| 60                    | 59                     | Members First CU                       | CU   | 4               | 254,724                        | 0      | 0                                 | 0.00                        | 0.00           | 4               | 254,724                        | 0                                 | 0.00                        | 0.00           |
| 61                    | 60                     | Michigan Coastal CU                    | CU   | 2               | 24,958                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 24,958                         | 0                                 | 0.00                        | 0.00           |
| 62                    | 61                     | Michigan First CU                      | CU   | 5               | 176,935                        | 0      | 0                                 | 0.00                        | 0.00           | 5               | 176,935                        | 0                                 | 0.00                        | 0.00           |
| 63                    | 62                     | Michigan One Community CU              | CU   | 4               | 158,279                        | 0      | 0                                 | 0.00                        | 0.00           | 4               | 158,279                        | 0                                 | 0.00                        | 0.00           |
| 64                    | 63                     | Michigan State University FCU          | CU   | 1               | 188,114                        | 0      | 0                                 | 0.00                        | 0.00           | 1               | 188,114                        | 0                                 | 0.00                        | 0.00           |
| 65                    | 64                     | Montcalm Public Employees CU           | CU   | 1               | 20,760                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 20,760                         | 0                                 | 0.00                        | 0.00           |
| 66                    | 65                     | Muskegon FCU                           | CU   | 2               | 69,918                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 69,918                         | 0                                 | 0.00                        | 0.00           |
| 67                    | 66                     | Muskegon Saint Joseph FCU              | CU   | 1               | 11,852                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 11,852                         | 0                                 | 0.00                        | 0.00           |
| 68                    | 67                     | North Central Area CU                  | CU   | 1               | 37,984                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 37,984                         | 0                                 | 0.00                        | 0.00           |
| 69                    | 68                     | Northland Area FCU                     | CU   | 2               | 72,601                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 72,601                         | 0                                 | 0.00                        | 0.00           |
| 70                    | 69                     | PARDA FCU                              | CU   | 2               | 46,696                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 46,696                         | 0                                 | 0.00                        | 0.00           |
| 71                    | 70                     | PFCU                                   | CU   | 5               | 305,394                        | 0      | 0                                 | 0.00                        | 0.00           | 5               | 305,394                        | 0                                 | 0.00                        | 0.00           |
| 72                    | 71                     | Port City FCU                          | CU   | 1               | 34,889                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 34,889                         | 0                                 | 0.00                        | 0.00           |
| 73                    | 72                     | Preferred CU                           | CU   | 4               | 177,248                        | 0      | 0                                 | 0.00                        | 0.00           | 4               | 177,248                        | 0                                 | 0.00                        | 0.00           |
| 74                    | 73                     | River Valley CU                        | CU   | 3               | 107,643                        | 0      | 0                                 | 0.00                        | 0.00           | 3               | 107,643                        | 0                                 | 0.00                        | 0.00           |
| 75                    | 74                     | Route 31 FCU                           | CU   | 2               | 83,610                         | 0      | 0                                 | 0.00                        | 0.00           | 2               | 83,610                         | 0                                 | 0.00                        | 0.00           |
| 76                    | 75                     | Service 1 FCU                          | CU   | 4               | 95,741                         | 0      | 0                                 | 0.00                        | 0.00           | 4               | 95,741                         | 0                                 | 0.00                        | 0.00           |
| 77                    | 76                     | Thomapple CU                           | CU   | 3               | 64,642                         | 0      | 0                                 | 0.00                        | 0.00           | 3               | 64,642                         | 0                                 | 0.00                        | 0.00           |
| 78                    | 77                     | Tri-Cities CU                          | CU   | 1               | 45,061                         | 0      | 0                                 | 0.00                        | 0.00           | 1               | 45,061                         | 0                                 | 0.00                        | 0.00           |
| 79                    | 78                     | United Federal CU                      | CU   | 2               | 160,654                        | 0      | 0                                 | 0.00                        | 0.00           | 2               | 160,654                        | 0                                 | 0.00                        | 0.00           |
| 80                    | 79                     | West Michigan Postal Service FCU       | CU   | 1               | 6,171                          | 0      | 0                                 | 0.00                        | 0.00           | 1               | 6,171                          | 0                                 | 0.00                        | 0.00           |
| 81                    | 80                     | WMCU                                   | CU   | 9               | 302,493                        | 0      | 0                                 | 0.00                        | 0.00           | 9               | 302,493                        | 0                                 | 0.00                        | 0.00           |
| TOTALS:               |                        |                                        |      | 514             | 51,757,832                     |        | 37,964,544                        | 100.00                      | 996.84         | 514             | 51,757,832                     | 37,964,544                        | 100.00                      | 1,071.78       |

PRE-MERGER HHI: 997  
 POST-MERGER HHI: 1,072  
 HHI CHANGE: 75

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.  
 \*\* Pro Forma Ownership assumes that announced transactions have been completed.  
 \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.



**Jackson, MI**

## Jackson, MI - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                       | Type   | Pre-Merger      |                                           |        |                                              |                                    | Post-Merger    |                 |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|-----------------------------------|--------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
|                                   |                        |                                   |        | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                   |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 5                                 |                        | Fifth Third Bancorp               | Bank   | 1               | 91,055                                    | 100    | 91,055                                       | 3.95                               | 15.64          |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                   |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 2                                 |                        | Comerica Inc.                     | Bank   | 4               | 456,689                                   | 100    | 456,689                                      | 19.83                              | 393.35         |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                   |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 2                                 |                        | Fifth Third Bancorp               | Bank   |                 |                                           |        |                                              |                                    |                | 5               | 547,744                                   | 547,744                                      | 23.79                              | 565.83         |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                   |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 1                      | Flagstar Financial Inc.           | Bank   | 7               | 620,807                                   | 100    | 620,807                                      | 26.96                              | 726.85         | 7               | 620,807                                   | 620,807                                      | 26.96                              | 726.85         |
| 3                                 | 3                      | CNB Community Bancorp Inc.        | Bank   | 7               | 430,975                                   | 100    | 430,975                                      | 18.72                              | 350.30         | 7               | 430,975                                   | 430,975                                      | 18.72                              | 350.30         |
| 4                                 | 4                      | Huntington Bancshares Inc.        | Bank   | 4               | 369,351                                   | 100    | 369,351                                      | 16.04                              | 257.28         | 4               | 369,351                                   | 369,351                                      | 16.04                              | 257.28         |
| 6                                 | 5                      | Southern Michigan Bancorp, Inc.   | Bank   | 3               | 66,297                                    | 100    | 66,297                                       | 2.88                               | 8.29           | 3               | 66,297                                    | 66,297                                       | 2.88                               | 8.29           |
| 7                                 | 6                      | Bank Michigan Financial Corp.     | Bank   | 1               | 56,147                                    | 100    | 56,147                                       | 2.44                               | 5.95           | 1               | 56,147                                    | 56,147                                       | 2.44                               | 5.95           |
| 8                                 | 7                      | PNC Financial Services Group Inc. | Bank   | 1               | 54,711                                    | 100    | 54,711                                       | 2.38                               | 5.65           | 1               | 54,711                                    | 54,711                                       | 2.38                               | 5.65           |
| 9                                 | 8                      | Independent Bank Corp.            | Bank   | 1               | 54,389                                    | 100    | 54,389                                       | 2.36                               | 5.58           | 1               | 54,389                                    | 54,389                                       | 2.36                               | 5.58           |
| 10                                | 9                      | Old National Bancorp              | Bank   | 1               | 53,022                                    | 100    | 53,022                                       | 2.30                               | 5.30           | 1               | 53,022                                    | 53,022                                       | 2.30                               | 5.30           |
| 11                                | 10                     | ChoiceOne Financial Services Inc. | Bank   | 2               | 43,331                                    | 100    | 43,331                                       | 1.88                               | 3.54           | 2               | 43,331                                    | 43,331                                       | 1.88                               | 3.54           |
| 12                                | 11                     | Homestead Savings Bank            | Thrift | 1               | 10,955                                    | 50     | 5,478                                        | 0.24                               | 0.06           | 1               | 10,955                                    | 5,478                                        | 0.24                               | 0.06           |
| 13                                | 12                     | CSB Bancorp Inc.                  | Bank   | 1               | 426                                       | 100    | 426                                          | 0.02                               | 0.00           | 1               | 426                                       | 426                                          | 0.02                               | 0.00           |
| 14                                | 13                     | Aeroquip CU                       | CU     | 2               | 40,937                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 40,937                                    | 0                                            | 0.00                               | 0.00           |
| 15                                | 14                     | American 1 CU                     | CU     | 10              | 323,806                                   | 0      | 0                                            | 0.00                               | 0.00           | 10              | 323,806                                   | 0                                            | 0.00                               | 0.00           |
| 16                                | 15                     | Community Choice CU               | CU     | 2               | 141,487                                   | 0      | 0                                            | 0.00                               | 0.00           | 2               | 141,487                                   | 0                                            | 0.00                               | 0.00           |
| 17                                | 16                     | Ignite Credit Union               | CU     | 1               | 25,423                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 25,423                                    | 0                                            | 0.00                               | 0.00           |
| 18                                | 17                     | Michigan First CU                 | CU     | 1               | 35,387                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 35,387                                    | 0                                            | 0.00                               | 0.00           |
| 19                                | 18                     | Michigan State University FCU     | CU     | 1               | 188,114                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 188,114                                   | 0                                            | 0.00                               | 0.00           |
| 20                                | 19                     | South Central CU                  | CU     | 2               | 72,766                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 72,766                                    | 0                                            | 0.00                               | 0.00           |
| 21                                | 20                     | TRUE Community CU                 | CU     | 8               | 422,829                                   | 0      | 0                                            | 0.00                               | 0.00           | 8               | 422,829                                   | 0                                            | 0.00                               | 0.00           |
| TOTALS:                           |                        |                                   |        | 61              | 3,558,904                                 |        | 2,302,678                                    | 100.00                             | 1,777.78       | 61              | 3,558,904                                 | 2,302,678                                    | 100.00                             | 1,934.63       |

PRE-MERGER HHI: 1,778  
 POST-MERGER HHI: 1,935  
 HHI CHANGE: 157

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.  
 \*\* Pro Forma Ownership assumes that announced transactions have been completed.  
 \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.

# **Kalamazoo-Battle Creek, MI**

## Kalamazoo-Battle Creek, MI - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre-Merger                        |                        |                                   |      |                 |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|-----------------------------------|------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                       | Type | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 |                        | Fifth Third Bancorp               | Bank | 8               | 1,184,761                                 | 100    | 1,184,761                                    | 20.58                              | 423.61         |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 10                                |                        | Comerica Inc.                     | Bank | 5               | 251,853                                   | 100    | 251,853                                      | 4.38                               | 19.14          |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 |                        | Fifth Third Bancorp               | Bank |                 |                                           |        |                                              |                                    |                | 13              | 1,436,614                                 | 1,436,614                                    | 24.96                              | 622.84         |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 2                                 | 2                      | PNC Financial Services Group Inc. | Bank | 7               | 965,983                                   | 100    | 965,983                                      | 16.78                              | 281.60         | 7               | 965,983                                   | 965,983                                      | 16.78                              | 281.60         |
| 3                                 | 3                      | First National Bancorp Inc.       | Bank | 3               | 585,153                                   | 100    | 585,153                                      | 10.17                              | 103.33         | 3               | 585,153                                   | 585,153                                      | 10.17                              | 103.33         |
| 4                                 | 4                      | Mercantile Bank Corp.             | Bank | 4               | 516,731                                   | 100    | 516,731                                      | 8.98                               | 80.58          | 4               | 516,731                                   | 516,731                                      | 8.98                               | 80.58          |
| 5                                 | 5                      | Huntington Bancshares Inc.        | Bank | 6               | 421,954                                   | 100    | 421,954                                      | 7.33                               | 53.73          | 6               | 421,954                                   | 421,954                                      | 7.33                               | 53.73          |
| 6                                 | 6                      | Old National Bancorp              | Bank | 3               | 354,936                                   | 100    | 354,936                                      | 6.17                               | 38.02          | 3               | 354,936                                   | 354,936                                      | 6.17                               | 38.02          |
| 7                                 | 7                      | JPMorgan Chase & Co.              | Bank | 2               | 335,675                                   | 100    | 335,675                                      | 5.83                               | 34.00          | 2               | 335,675                                   | 335,675                                      | 5.83                               | 34.00          |
| 8                                 | 8                      | Sturgis Bancorp Inc.              | Bank | 9               | 303,475                                   | 100    | 303,475                                      | 5.27                               | 27.79          | 9               | 303,475                                   | 303,475                                      | 5.27                               | 27.79          |
| 9                                 | 9                      | Southern Michigan Bancorp, Inc.   | Bank | 5               | 300,084                                   | 100    | 300,084                                      | 5.21                               | 27.18          | 5               | 300,084                                   | 300,084                                      | 5.21                               | 27.18          |
| 11                                | 10                     | Flagstar Financial Inc.           | Bank | 3               | 146,231                                   | 100    | 146,231                                      | 2.54                               | 6.45           | 3               | 146,231                                   | 146,231                                      | 2.54                               | 6.45           |
| 12                                | 11                     | Horizon Bancorp Inc.              | Bank | 3               | 135,489                                   | 100    | 135,489                                      | 2.35                               | 5.54           | 3               | 135,489                                   | 135,489                                      | 2.35                               | 5.54           |
| 13                                | 12                     | Kalamazoo County State Bank       | Bank | 3               | 108,144                                   | 100    | 108,144                                      | 1.88                               | 3.53           | 3               | 108,144                                   | 108,144                                      | 1.88                               | 3.53           |
| 14                                | 13                     | 1st Source Corp.                  | Bank | 2               | 60,619                                    | 100    | 60,619                                       | 1.05                               | 1.11           | 2               | 60,619                                    | 60,619                                       | 1.05                               | 1.11           |
| 15                                | 14                     | GTSB Financial Inc.               | Bank | 1               | 46,180                                    | 100    | 46,180                                       | 0.80                               | 0.64           | 1               | 46,180                                    | 46,180                                       | 0.80                               | 0.64           |
| 16                                | 15                     | Century Financial Corp.           | Bank | 2               | 39,121                                    | 100    | 39,121                                       | 0.68                               | 0.46           | 2               | 39,121                                    | 39,121                                       | 0.68                               | 0.46           |
| 17                                | 16                     | CNB Community Bancorp Inc.        | Bank | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 18                                | 17                     | HCB Financial Corp.               | Bank | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 19                                | 18                     | Union Financial Corp.             | Bank | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 20                                | 19                     | Advia CU                          | CU   | 9               | 895,276                                   | 0      | 0                                            | 0.00                               | 0.00           | 9               | 895,276                                   | 0                                            | 0.00                               | 0.00           |
| 21                                | 20                     | Arbor Financial CU                | CU   | 8               | 516,340                                   | 0      | 0                                            | 0.00                               | 0.00           | 8               | 516,340                                   | 0                                            | 0.00                               | 0.00           |
| 22                                | 21                     | Community Promise FCU             | CU   | 1               | 568                                       | 0      | 0                                            | 0.00                               | 0.00           | 1               | 568                                       | 0                                            | 0.00                               | 0.00           |
| 23                                | 22                     | Consumers CU                      | CU   | 15              | 960,339                                   | 0      | 0                                            | 0.00                               | 0.00           | 15              | 960,339                                   | 0                                            | 0.00                               | 0.00           |
| 24                                | 23                     | Honor CU                          | CU   | 7               | 371,939                                   | 0      | 0                                            | 0.00                               | 0.00           | 7               | 371,939                                   | 0                                            | 0.00                               | 0.00           |
| 25                                | 24                     | Ignite Credit Union               | CU   | 2               | 50,847                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 50,847                                    | 0                                            | 0.00                               | 0.00           |
| 26                                | 25                     | KALSEE CU                         | CU   | 6               | 220,024                                   | 0      | 0                                            | 0.00                               | 0.00           | 6               | 220,024                                   | 0                                            | 0.00                               | 0.00           |
| 27                                | 26                     | Kellogg Community CU              | CU   | 6               | 329,647                                   | 0      | 0                                            | 0.00                               | 0.00           | 6               | 329,647                                   | 0                                            | 0.00                               | 0.00           |
| 28                                | 27                     | Lake Michigan CU                  | CU   | 5               | 871,013                                   | 0      | 0                                            | 0.00                               | 0.00           | 5               | 871,013                                   | 0                                            | 0.00                               | 0.00           |
| 29                                | 28                     | Omni Community CU                 | CU   | 7               | 274,809                                   | 0      | 0                                            | 0.00                               | 0.00           | 7               | 274,809                                   | 0                                            | 0.00                               | 0.00           |
| 30                                | 29                     | Preferred CU                      | CU   | 1               | 44,312                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 44,312                                    | 0                                            | 0.00                               | 0.00           |
| 31                                | 30                     | State Farm FCU                    | CU   | 1               | 381,227                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 381,227                                   | 0                                            | 0.00                               | 0.00           |
| 32                                | 31                     | United Bay Community CU           | CU   | 2               | 92,385                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 92,385                                    | 0                                            | 0.00                               | 0.00           |
| TOTALS:                           |                        |                                   |      | 139             | 10,765,115                                |        | 5,756,389                                    | 100.00                             | 1,106.73       | 139             | 10,765,115                                | 5,756,389                                    | 100.00                             | 1,286.82       |

PRE-MERGER HHI: 1,107  
 POST-MERGER HHI: 1,287  
 HHI CHANGE: 180

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.
- \*\* Pro Forma Ownership assumes that announced transactions have been completed.
- \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.

**Lansing, MI**

## Lansing, MI - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre-Merger                        |                        |                                     |        |                 |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|-------------------------------------|--------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                         | Type   | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 4                                 |                        | Fifth Third Bancorp                 | Bank   | 8               | 1,121,972                                 | 100    | 1,121,972                                    | 9.43                               | 88.85          |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 9                                 |                        | Comerica Inc.                       | Bank   | 5               | 463,558                                   | 100    | 463,558                                      | 3.89                               | 15.17          |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 3                                 |                        | Fifth Third Bancorp                 | Bank   |                 |                                           |        |                                              |                                    |                | 13              | 1,585,530                                 | 1,585,530                                    | 13.32                              | 177.44         |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                     |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 1                      | First National Bancshares Inc.      | Bank   | 1               | 3,237,299                                 | 100    | 3,237,299                                    | 27.20                              | 739.72         | 1               | 3,237,299                                 | 3,237,299                                    | 27.20                              | 739.72         |
| 2                                 | 2                      | PNC Financial Services Group Inc.   | Bank   | 8               | 1,683,812                                 | 100    | 1,683,812                                    | 14.15                              | 200.12         | 8               | 1,683,812                                 | 1,683,812                                    | 14.15                              | 200.12         |
| 3                                 | 4                      | Dart Financial Corp.                | Bank   | 4               | 1,152,249                                 | 100    | 1,152,249                                    | 9.68                               | 93.71          | 4               | 1,152,249                                 | 1,152,249                                    | 9.68                               | 93.71          |
| 5                                 | 5                      | JPMorgan Chase & Co.                | Bank   | 6               | 858,644                                   | 100    | 858,644                                      | 7.21                               | 52.04          | 6               | 858,644                                   | 858,644                                      | 7.21                               | 52.04          |
| 6                                 | 6                      | Huntington Bancshares Inc.          | Bank   | 9               | 795,038                                   | 100    | 795,038                                      | 6.68                               | 44.61          | 9               | 795,038                                   | 795,038                                      | 6.68                               | 44.61          |
| 7                                 | 7                      | Bank of America Corp.               | Bank   | 4               | 605,937                                   | 100    | 605,937                                      | 5.09                               | 25.92          | 4               | 605,937                                   | 605,937                                      | 5.09                               | 25.92          |
| 8                                 | 8                      | Independent Bank Corp.              | Bank   | 8               | 541,912                                   | 100    | 541,912                                      | 4.55                               | 20.73          | 8               | 541,912                                   | 541,912                                      | 4.55                               | 20.73          |
| 10                                | 9                      | Mercantile Bank Corp.               | Bank   | 2               | 369,985                                   | 100    | 369,985                                      | 3.11                               | 9.66           | 2               | 369,985                                   | 369,985                                      | 3.11                               | 9.66           |
| 11                                | 10                     | Flagstar Financial Inc.             | Bank   | 3               | 332,415                                   | 100    | 332,415                                      | 2.79                               | 7.80           | 3               | 332,415                                   | 332,415                                      | 2.79                               | 7.80           |
| 12                                | 11                     | Eaton Federal Mutual Holding Co.    | Thrift | 6               | 406,617                                   | 50     | 203,309                                      | 1.71                               | 2.92           | 6               | 406,617                                   | 203,309                                      | 1.71                               | 2.92           |
| 13                                | 12                     | Capitol National Bank               | Bank   | 2               | 154,617                                   | 100    | 154,617                                      | 1.30                               | 1.69           | 2               | 154,617                                   | 154,617                                      | 1.30                               | 1.69           |
| 14                                | 13                     | Union Financial Corp.               | Bank   | 3               | 124,715                                   | 100    | 124,715                                      | 1.05                               | 1.10           | 3               | 124,715                                   | 124,715                                      | 1.05                               | 1.10           |
| 15                                | 14                     | Commercial National Financial Corp. | Bank   | 3               | 107,409                                   | 100    | 107,409                                      | 0.90                               | 0.81           | 3               | 107,409                                   | 107,409                                      | 0.90                               | 0.81           |
| 16                                | 15                     | Horizon Bancorp Inc.                | Bank   | 2               | 90,863                                    | 100    | 90,863                                       | 0.76                               | 0.58           | 2               | 90,863                                    | 90,863                                       | 0.76                               | 0.58           |
| 17                                | 16                     | First National Bancorp Inc.         | Bank   | 1               | 28,597                                    | 100    | 28,597                                       | 0.24                               | 0.06           | 1               | 28,597                                    | 28,597                                       | 0.24                               | 0.06           |
| 18                                | 17                     | ChoiceOne Financial Services Inc.   | Bank   | 1               | 27,357                                    | 100    | 27,357                                       | 0.23                               | 0.05           | 1               | 27,357                                    | 27,357                                       | 0.23                               | 0.05           |
| 19                                | 18                     | Homestead Savings Bank              | Thrift | 1               | 6,216                                     | 50     | 3,108                                        | 0.03                               | 0.00           | 1               | 6,216                                     | 3,108                                        | 0.03                               | 0.00           |
| 20                                | 19                     | CNB Community Bancorp Inc.          | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 21                                | 20                     | Adventure CU                        | CU     | 5               | 253,696                                   | 0      | 0                                            | 0.00                               | 0.00           | 5               | 253,696                                   | 0                                            | 0.00                               | 0.00           |
| 22                                | 21                     | Auto-Owners Associates CU           | CU     | 1               | 33,684                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 33,684                                    | 0                                            | 0.00                               | 0.00           |
| 23                                | 22                     | CASE CU                             | CU     | 5               | 331,481                                   | 0      | 0                                            | 0.00                               | 0.00           | 5               | 331,481                                   | 0                                            | 0.00                               | 0.00           |
| 24                                | 23                     | Consumers CU                        | CU     | 4               | 256,107                                   | 0      | 0                                            | 0.00                               | 0.00           | 4               | 256,107                                   | 0                                            | 0.00                               | 0.00           |
| 25                                | 24                     | Consumers Professional CU           | CU     | 2               | 59,276                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 59,276                                    | 0                                            | 0.00                               | 0.00           |
| 26                                | 25                     | DFCU Financial                      | CU     | 3               | 532,662                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 532,662                                   | 0                                            | 0.00                               | 0.00           |
| 27                                | 26                     | Farm Bureau Family CU               | CU     | 1               | 22,460                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 22,460                                    | 0                                            | 0.00                               | 0.00           |
| 28                                | 27                     | Journey FCU                         | CU     | 3               | 122,642                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 122,642                                   | 0                                            | 0.00                               | 0.00           |
| 29                                | 28                     | LAFCU                               | CU     | 8               | 734,375                                   | 0      | 0                                            | 0.00                               | 0.00           | 8               | 734,375                                   | 0                                            | 0.00                               | 0.00           |
| 30                                | 29                     | Lake Trust CU                       | CU     | 7               | 731,260                                   | 0      | 0                                            | 0.00                               | 0.00           | 7               | 731,260                                   | 0                                            | 0.00                               | 0.00           |
| 31                                | 30                     | Michigan First CU                   | CU     | 2               | 70,774                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 70,774                                    | 0                                            | 0.00                               | 0.00           |
| 32                                | 31                     | Michigan State University FCU       | CU     | 14              | 2,633,591                                 | 0      | 0                                            | 0.00                               | 0.00           | 14              | 2,633,591                                 | 0                                            | 0.00                               | 0.00           |
| 33                                | 32                     | PFCU                                | CU     | 2               | 61,079                                    | 0      | 0                                            | 0.00                               | 0.00           | 2               | 61,079                                    | 0                                            | 0.00                               | 0.00           |
| 34                                | 33                     | TRUE Community CU                   | CU     | 1               | 52,854                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 52,854                                    | 0                                            | 0.00                               | 0.00           |
| TOTALS:                           |                        |                                     |        | 136             | 18,005,153                                |        | 11,902,796                                   | 100.00                             | 1,305.54       | 136             | 18,005,153                                | 11,902,796                                   | 100.00                             | 1,378.96       |

PRE-MERGER HHI: 1,306  
 POST-MERGER HHI: 1,379  
 HHI CHANGE: 73

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.  
 \*\* Pro Forma Ownership assumes that announced transactions have been completed.  
 \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.



**Miami-Fort Lauderdale, FL**

## Miami-Fort Lauderdale, FL - FRB Banking Market

Ownership info as of Sep 29 2025

## DEPOSIT BASED HHI

## FRB Initial Screen \*

| Pre-Merger                        |                        |                                                 |      |                 |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|-------------------------------------------------|------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                                     | Type | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                                 |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 42                                |                        | Fifth Third Bancorp                             | Bank | 8               | 995,169                                   | 100    | 995,169                                      | 0.35                               | 0.12           |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                                 |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 66                                |                        | Comerica Inc.                                   | Bank | 1               | 107,476                                   | 100    | 107,476                                      | 0.04                               | 0.00           |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                                 |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 37                                |                        | Fifth Third Bancorp                             | Bank |                 |                                           |        |                                              |                                    |                | 9               | 1,102,645                                 | 1,102,645                                    | 0.39                               | 0.15           |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                                 |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 1                      | Bank of America Corp.                           | Bank | 120             | 43,265,541                                | 100    | 43,265,541                                   | 15.22                              | 231.76         | 120             | 43,265,541                                | 43,265,541                                   | 15.22                              | 231.76         |
| 2                                 | 2                      | JPMorgan Chase & Co.                            | Bank | 123             | 32,129,131                                | 100    | 32,129,131                                   | 11.31                              | 127.81         | 123             | 32,129,131                                | 32,129,131                                   | 11.31                              | 127.81         |
| 3                                 | 3                      | Wells Fargo & Co.                               | Bank | 114             | 28,371,014                                | 100    | 28,371,014                                   | 9.98                               | 99.66          | 114             | 28,371,014                                | 28,371,014                                   | 9.98                               | 99.66          |
| 4                                 | 4                      | Citigroup Inc.                                  | Bank | 45              | 19,870,000                                | 100    | 19,870,000                                   | 6.99                               | 48.88          | 45              | 19,870,000                                | 19,870,000                                   | 6.99                               | 48.88          |
| 5                                 | 5                      | Banco de Credito e Inversiones                  | Bank | 27              | 19,435,163                                | 100    | 19,435,163                                   | 6.84                               | 46.77          | 27              | 19,435,163                                | 19,435,163                                   | 6.84                               | 46.77          |
| 6                                 | 6                      | BankUnited Inc.                                 | Bank | 28              | 19,392,228                                | 100    | 19,392,228                                   | 6.82                               | 46.56          | 28              | 19,392,228                                | 19,392,228                                   | 6.82                               | 46.56          |
| 7                                 | 7                      | Truist Financial Corp.                          | Bank | 81              | 16,647,464                                | 100    | 16,647,464                                   | 5.86                               | 34.31          | 81              | 16,647,464                                | 16,647,464                                   | 5.86                               | 34.31          |
| 8                                 | 8                      | Amerant Bancorp Inc.                            | Bank | 18              | 7,968,275                                 | 100    | 7,968,275                                    | 2.80                               | 7.86           | 18              | 7,968,275                                 | 7,968,275                                    | 2.80                               | 7.86           |
| 9                                 | 9                      | The Toronto-Dominion Bank                       | Bank | 55              | 7,411,106                                 | 100    | 7,411,106                                    | 2.61                               | 6.80           | 55              | 7,411,106                                 | 7,411,106                                    | 2.61                               | 6.80           |
| 10                                | 10                     | Ocean Bankshares Inc.                           | Bank | 22              | 6,040,219                                 | 100    | 6,040,219                                    | 2.13                               | 4.52           | 22              | 6,040,219                                 | 6,040,219                                    | 2.13                               | 4.52           |
| 11                                | 11                     | First Horizon Corp.                             | Bank | 25              | 5,411,675                                 | 100    | 5,411,675                                    | 1.90                               | 3.63           | 25              | 5,411,675                                 | 5,411,675                                    | 1.90                               | 3.63           |
| 12                                | 12                     | Regions Financial Corp.                         | Bank | 51              | 5,149,081                                 | 100    | 5,149,081                                    | 1.81                               | 3.28           | 51              | 5,149,081                                 | 5,149,081                                    | 1.81                               | 3.28           |
| 13                                | 13                     | Banco Bradesco SA                               | Bank | 1               | 4,234,280                                 | 100    | 4,234,280                                    | 1.49                               | 2.22           | 1               | 4,234,280                                 | 4,234,280                                    | 1.49                               | 2.22           |
| 14                                | 14                     | HSBC Holdings PLC                               | Bank | 2               | 3,853,291                                 | 100    | 3,853,291                                    | 1.36                               | 1.84           | 2               | 3,853,291                                 | 3,853,291                                    | 1.36                               | 1.84           |
| 15                                | 15                     | Popular Inc.                                    | Bank | 12              | 3,804,523                                 | 100    | 3,804,523                                    | 1.34                               | 1.79           | 12              | 3,804,523                                 | 3,804,523                                    | 1.34                               | 1.79           |
| 16                                | 16                     | Northern Trust Corp.                            | Bank | 5               | 3,673,946                                 | 100    | 3,673,946                                    | 1.29                               | 1.67           | 5               | 3,673,946                                 | 3,673,946                                    | 1.29                               | 1.67           |
| 17                                | 17                     | Banco de Credito e Inversiones S.A. Miami Branc | Bank | 1               | 3,673,199                                 | 100    | 3,673,199                                    | 1.29                               | 1.67           | 1               | 3,673,199                                 | 3,673,199                                    | 1.29                               | 1.67           |
| 18                                | 18                     | Banco de Sabadell SA                            | Bank | 1               | 3,603,924                                 | 100    | 3,603,924                                    | 1.27                               | 1.61           | 1               | 3,603,924                                 | 3,603,924                                    | 1.27                               | 1.61           |
| 19                                | 19                     | Banescos USA                                    | Bank | 5               | 3,268,313                                 | 100    | 3,268,313                                    | 1.15                               | 1.32           | 5               | 3,268,313                                 | 3,268,313                                    | 1.15                               | 1.32           |
| 20                                | 20                     | Banco do Brasil SA                              | Bank | 4               | 2,590,610                                 | 100    | 2,590,610                                    | 0.91                               | 0.83           | 4               | 2,590,610                                 | 2,590,610                                    | 0.91                               | 0.83           |
| 21                                | 21                     | Home BancShares Inc.                            | Bank | 17              | 2,395,724                                 | 100    | 2,395,724                                    | 0.84                               | 0.71           | 17              | 2,395,724                                 | 2,395,724                                    | 0.84                               | 0.71           |
| 22                                | 22                     | SNBNY Holdings Ltd.                             | Bank | 2               | 2,363,666                                 | 100    | 2,363,666                                    | 0.83                               | 0.69           | 2               | 2,363,666                                 | 2,363,666                                    | 0.83                               | 0.69           |
| 23                                | 23                     | USCB Financial Holdings Inc.                    | Bank | 10              | 2,358,264                                 | 100    | 2,358,264                                    | 0.83                               | 0.69           | 10              | 2,358,264                                 | 2,358,264                                    | 0.83                               | 0.69           |
| 24                                | 24                     | Valley National Bancorp                         | Bank | 7               | 2,308,466                                 | 100    | 2,308,466                                    | 0.81                               | 0.66           | 7               | 2,308,466                                 | 2,308,466                                    | 0.81                               | 0.66           |
| 25                                | 25                     | Pinnacle Financial Partners Inc.                | Bank | 12              | 2,200,082                                 | 100    | 2,200,082                                    | 0.77                               | 0.60           | 12              | 2,200,082                                 | 2,200,082                                    | 0.77                               | 0.60           |
| 26                                | 26                     | Israel Discount Bank Ltd.                       | Bank | 1               | 2,086,693                                 | 100    | 2,086,693                                    | 0.73                               | 0.54           | 1               | 2,086,693                                 | 2,086,693                                    | 0.73                               | 0.54           |
| 27                                | 27                     | Seacoast Banking Corp. of Florida               | Bank | 12              | 1,906,030                                 | 100    | 1,906,030                                    | 0.67                               | 0.45           | 12              | 1,906,030                                 | 1,906,030                                    | 0.67                               | 0.45           |
| 28                                | 28                     | First BanCorp.                                  | Bank | 9               | 1,820,416                                 | 100    | 1,820,416                                    | 0.64                               | 0.41           | 9               | 1,820,416                                 | 1,820,416                                    | 0.64                               | 0.41           |
| 29                                | 29                     | PNC Financial Services Group Inc.               | Bank | 31              | 1,689,736                                 | 100    | 1,689,736                                    | 0.59                               | 0.35           | 31              | 1,689,736                                 | 1,689,736                                    | 0.59                               | 0.35           |
| 30                                | 30                     | Flagstar Financial Inc.                         | Bank | 12              | 1,688,997                                 | 100    | 1,688,997                                    | 0.59                               | 0.35           | 12              | 1,688,997                                 | 1,688,997                                    | 0.59                               | 0.35           |
| 31                                | 31                     | SouthState Bank Corp.                           | Bank | 10              | 1,410,946                                 | 100    | 1,410,946                                    | 0.50                               | 0.25           | 10              | 1,410,946                                 | 1,410,946                                    | 0.50                               | 0.25           |
| 32                                | 32                     | Coconut Grove Bankshares Inc.                   | Bank | 5               | 1,213,575                                 | 100    | 1,213,575                                    | 0.43                               | 0.18           | 5               | 1,213,575                                 | 1,213,575                                    | 0.43                               | 0.18           |
| 33                                | 33                     | ITAU Unibanco S.A. Miami Branch                 | Bank | 1               | 1,198,380                                 | 100    | 1,198,380                                    | 0.42                               | 0.18           | 1               | 1,198,380                                 | 1,198,380                                    | 0.42                               | 0.18           |
| 34                                | 34                     | NewtekOne Inc.                                  | Bank | 1               | 1,156,509                                 | 100    | 1,156,509                                    | 0.41                               | 0.17           | 1               | 1,156,509                                 | 1,156,509                                    | 0.41                               | 0.17           |
| 35                                | 35                     | United Community Banks Inc.                     | Bank | 5               | 1,152,485                                 | 100    | 1,152,485                                    | 0.41                               | 0.16           | 5               | 1,152,485                                 | 1,152,485                                    | 0.41                               | 0.16           |
| 36                                | 36                     | IFB Bancorp Inc.                                | Bank | 2               | 1,145,224                                 | 100    | 1,145,224                                    | 0.40                               | 0.16           | 2               | 1,145,224                                 | 1,145,224                                    | 0.40                               | 0.16           |
| 37                                | 38                     | Pacific National Bank                           | Bank | 4               | 1,069,496                                 | 100    | 1,069,496                                    | 0.38                               | 0.14           | 4               | 1,069,496                                 | 1,069,496                                    | 0.38                               | 0.14           |

## Miami-Fort Lauderdale, FL - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre<br>Merger<br>Rank | Post<br>Merger<br>Rank | Institution                                   | Type   | Pre-Merger      |                                |        |                                   |                                    |                | Post-Merger     |                                |                                   |                                    |                |
|-----------------------|------------------------|-----------------------------------------------|--------|-----------------|--------------------------------|--------|-----------------------------------|------------------------------------|----------------|-----------------|--------------------------------|-----------------------------------|------------------------------------|----------------|
|                       |                        |                                               |        | Branch<br>Count | Total<br>Deposits<br>in Market | Weight | Weighted<br>Deposits in<br>Market | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market | Weighted<br>Deposits in<br>Market | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
|                       |                        |                                               |        |                 | (\$000)                        |        | (\$000)                           |                                    |                |                 | (\$000)                        |                                   |                                    |                |
| 38                    | 39                     | First Citizens BancShares Inc.                | Bank   | 6               | 1,067,190                      | 100    | 1,067,190                         | 0.38                               | 0.14           | 6               | 1,067,190                      | 1,067,190                         | 0.38                               | 0.14           |
| 39                    | 40                     | Grupo Boursa                                  | Bank   | 1               | 1,062,138                      | 100    | 1,062,138                         | 0.37                               | 0.14           | 1               | 1,062,138                      | 1,062,138                         | 0.37                               | 0.14           |
| 40                    | 41                     | Intercredit Bank NA                           | Bank   | 4               | 1,060,732                      | 100    | 1,060,732                         | 0.37                               | 0.14           | 4               | 1,060,732                      | 1,060,732                         | 0.37                               | 0.14           |
| 41                    | 42                     | EverBank Financial Corp.                      | Bank   | 2               | 1,032,772                      | 100    | 1,032,772                         | 0.36                               | 0.13           | 2               | 1,032,772                      | 1,032,772                         | 0.36                               | 0.13           |
| 43                    | 43                     | Helm Bank USA                                 | Bank   | 1               | 978,313                        | 100    | 978,313                           | 0.34                               | 0.12           | 1               | 978,313                        | 978,313                           | 0.34                               | 0.12           |
| 44                    | 44                     | OptimumBank Holdings Inc.                     | Bank   | 4               | 879,969                        | 100    | 879,969                           | 0.31                               | 0.10           | 4               | 879,969                        | 879,969                           | 0.31                               | 0.10           |
| 45                    | 45                     | Bank OZK                                      | Bank   | 6               | 840,644                        | 100    | 840,644                           | 0.30                               | 0.09           | 6               | 840,644                        | 840,644                           | 0.30                               | 0.09           |
| 46                    | 46                     | Interaudi Bank                                | Bank   | 1               | 743,682                        | 100    | 743,682                           | 0.26                               | 0.07           | 1               | 743,682                        | 743,682                           | 0.26                               | 0.07           |
| 47                    | 47                     | Terrabank NA                                  | Bank   | 4               | 737,051                        | 100    | 737,051                           | 0.26                               | 0.07           | 4               | 737,051                        | 737,051                           | 0.26                               | 0.07           |
| 48                    | 48                     | First American Bank Corp.                     | Bank   | 6               | 654,328                        | 100    | 654,328                           | 0.23                               | 0.05           | 6               | 654,328                        | 654,328                           | 0.23                               | 0.05           |
| 49                    | 49                     | Grupo Aval Acciones y Valores SA              | Bank   | 1               | 640,036                        | 100    | 640,036                           | 0.23                               | 0.05           | 1               | 640,036                        | 640,036                           | 0.23                               | 0.05           |
| 50                    | 50                     | Sunstate Bancshares Inc.                      | Bank   | 3               | 454,597                        | 100    | 454,597                           | 0.16                               | 0.03           | 3               | 454,597                        | 454,597                           | 0.16                               | 0.03           |
| 51                    | 51                     | Grupo Financiero Pichincha                    | Bank   | 1               | 432,600                        | 100    | 432,600                           | 0.15                               | 0.02           | 1               | 432,600                        | 432,600                           | 0.15                               | 0.02           |
| 52                    | 52                     | Banco De Credito Del Peru - Miami Agency      | Bank   | 1               | 355,770                        | 100    | 355,770                           | 0.13                               | 0.02           | 1               | 355,770                        | 355,770                           | 0.13                               | 0.02           |
| 53                    | 53                     | Citizens Financial Group Inc.                 | Bank   | 5               | 320,768                        | 100    | 320,768                           | 0.11                               | 0.01           | 5               | 320,768                        | 320,768                           | 0.11                               | 0.01           |
| 54                    | 54                     | Abanca Corporacion Bancaria                   | Bank   | 1               | 280,853                        | 100    | 280,853                           | 0.10                               | 0.01           | 1               | 280,853                        | 280,853                           | 0.10                               | 0.01           |
| 55                    | 55                     | Banco de la Nacion Argentina SA               | Bank   | 1               | 279,540                        | 100    | 279,540                           | 0.10                               | 0.01           | 1               | 279,540                        | 279,540                           | 0.10                               | 0.01           |
| 56                    | 56                     | Desjardins Group                              | Bank   | 3               | 254,680                        | 100    | 254,680                           | 0.09                               | 0.01           | 3               | 254,680                        | 254,680                           | 0.09                               | 0.01           |
| 57                    | 57                     | Locality Bank                                 | Bank   | 1               | 249,633                        | 100    | 249,633                           | 0.09                               | 0.01           | 1               | 249,633                        | 249,633                           | 0.09                               | 0.01           |
| 58                    | 58                     | Royal Bank of Canada                          | Bank   | 1               | 234,789                        | 100    | 234,789                           | 0.08                               | 0.01           | 1               | 234,789                        | 234,789                           | 0.08                               | 0.01           |
| 59                    | 59                     | First State Bank of Florida Keys Holding Co.  | Bank   | 4               | 195,381                        | 100    | 195,381                           | 0.07                               | 0.00           | 4               | 195,381                        | 195,381                           | 0.07                               | 0.00           |
| 60                    | 60                     | Evermore Bank                                 | Bank   | 1               | 177,707                        | 100    | 177,707                           | 0.06                               | 0.00           | 1               | 177,707                        | 177,707                           | 0.06                               | 0.00           |
| 61                    | 61                     | Banco Santander SA                            | Bank   | 2               | 175,934                        | 100    | 175,934                           | 0.06                               | 0.00           | 2               | 175,934                        | 175,934                           | 0.06                               | 0.00           |
| 62                    | 62                     | TFS Financial Corp.                           | Thrift | 3               | 328,629                        | 50     | 164,315                           | 0.06                               | 0.00           | 3               | 328,629                        | 164,315                           | 0.06                               | 0.00           |
| 63                    | 63                     | Amerasia Bank                                 | Bank   | 3               | 163,856                        | 100    | 163,856                           | 0.06                               | 0.00           | 3               | 163,856                        | 163,856                           | 0.06                               | 0.00           |
| 64                    | 64                     | National Bank of Canada                       | Bank   | 2               | 154,859                        | 100    | 154,859                           | 0.05                               | 0.00           | 2               | 154,859                        | 154,859                           | 0.05                               | 0.00           |
| 65                    | 65                     | Interamerican Bank A FSB                      | Thrift | 4               | 234,055                        | 50     | 117,028                           | 0.04                               | 0.00           | 4               | 234,055                        | 117,028                           | 0.04                               | 0.00           |
| 67                    | 66                     | Anchor Bancorp Inc.                           | Bank   | 2               | 106,849                        | 100    | 106,849                           | 0.04                               | 0.00           | 2               | 106,849                        | 106,849                           | 0.04                               | 0.00           |
| 68                    | 67                     | Eastern National Bank                         | Bank   | 4               | 87,364                         | 100    | 87,364                            | 0.03                               | 0.00           | 4               | 87,364                         | 87,364                            | 0.03                               | 0.00           |
| 69                    | 68                     | FNC Bancorp Inc.                              | Bank   | 1               | 79,919                         | 100    | 79,919                            | 0.03                               | 0.00           | 1               | 79,919                         | 79,919                            | 0.03                               | 0.00           |
| 70                    | 69                     | Bank of Montreal                              | Bank   | 1               | 47,495                         | 100    | 47,495                            | 0.02                               | 0.00           | 1               | 47,495                         | 47,495                            | 0.02                               | 0.00           |
| 71                    | 70                     | BankMiami                                     | Bank   | 1               | 43,386                         | 100    | 43,386                            | 0.02                               | 0.00           | 1               | 43,386                         | 43,386                            | 0.02                               | 0.00           |
| 72                    | 71                     | Belmont Financial Group Inc.                  | Bank   | 1               | 27,194                         | 100    | 27,194                            | 0.01                               | 0.00           | 1               | 27,194                         | 27,194                            | 0.01                               | 0.00           |
| 73                    | 72                     | OneUnited Bank                                | Bank   | 1               | 23,079                         | 100    | 23,079                            | 0.01                               | 0.00           | 1               | 23,079                         | 23,079                            | 0.01                               | 0.00           |
| 74                    | 73                     | Capital Bancorp Inc.                          | Bank   | 1               | 8,072                          | 100    | 8,072                             | 0.00                               | 0.00           | 1               | 8,072                          | 8,072                             | 0.00                               | 0.00           |
| 75                    | 74                     | Anthem Bank & Trust                           | Thrift | 1               | 10,373                         | 50     | 5,187                             | 0.00                               | 0.00           | 1               | 10,373                         | 5,187                             | 0.00                               | 0.00           |
| 76                    | 75                     | New York Pvt. Bank & Trust Corp.              | Bank   | 1               | 1,054                          | 100    | 1,054                             | 0.00                               | 0.00           | 1               | 1,054                          | 1,054                             | 0.00                               | 0.00           |
| 77                    | 76                     | Banco Internacional de Costa Rica S. A.       | Bank   | 1               | 0                              | 100    | 0                                 | 0.00                               | 0.00           | 1               | 0                              | 0                                 | 0.00                               | 0.00           |
| 78                    | 77                     | Bank Hapoalim BM                              | Bank   | 1               | 0                              | 100    | 0                                 | 0.00                               | 0.00           | 1               | 0                              | 0                                 | 0.00                               | 0.00           |
| 79                    | 78                     | Bank of New York Mellon Corp.                 | Bank   | 2               | 0                              | 100    | 0                                 | 0.00                               | 0.00           | 2               | 0                              | 0                                 | 0.00                               | 0.00           |
| 80                    | 79                     | GiantBank.com - a Division of Centennial Bank | Bank   | 1               | 0                              | 100    | 0                                 | 0.00                               | 0.00           | 1               | 0                              | 0                                 | 0.00                               | 0.00           |
| 81                    | 80                     | Illinois National Bancorp Inc.                | Bank   | 1               | 0                              | 100    | 0                                 | 0.00                               | 0.00           | 1               | 0                              | 0                                 | 0.00                               | 0.00           |
| 82                    | 81                     | Popular Direct - a Division of Popular Bank   | Bank   | 1               | 0                              | 100    | 0                                 | 0.00                               | 0.00           | 1               | 0                              | 0                                 | 0.00                               | 0.00           |
| 83                    | 82                     | American Airlines FCU                         | CU     | 6               | 1,064,263                      | 0      | 0                                 | 0.00                               | 0.00           | 6               | 1,064,263                      | 0                                 | 0.00                               | 0.00           |
| 84                    | 83                     | Baptist Health South Florida FCU              | CU     | 9               | 110,951                        | 0      | 0                                 | 0.00                               | 0.00           | 9               | 110,951                        | 0                                 | 0.00                               | 0.00           |
| 85                    | 84                     | Baxter CU                                     | CU     | 1               | 69,044                         | 0      | 0                                 | 0.00                               | 0.00           | 1               | 69,044                         | 0                                 | 0.00                               | 0.00           |
| 86                    | 85                     | BrightStar CU                                 | CU     | 9               | 825,007                        | 0      | 0                                 | 0.00                               | 0.00           | 9               | 825,007                        | 0                                 | 0.00                               | 0.00           |

## Miami-Fort Lauderdale, FL - FRB Banking Market

Ownership info as of Sep 29 2025

## DEPOSIT BASED HHI

## FRB Initial Screen \*

| Pre<br>Merger<br>Rank | Post<br>Merger<br>Rank | Institution                                     | Type | Pre-Merger      |                                |                                   |                             |                | Post-Merger     |                                |                                   |                             |                |         |
|-----------------------|------------------------|-------------------------------------------------|------|-----------------|--------------------------------|-----------------------------------|-----------------------------|----------------|-----------------|--------------------------------|-----------------------------------|-----------------------------|----------------|---------|
|                       |                        |                                                 |      | Branch<br>Count | Total<br>Deposits<br>in Market | Weighted<br>Deposits in<br>Market | Weighted<br>Market<br>Share | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market | Weighted<br>Deposits in<br>Market | Weighted<br>Market<br>Share | Deposit<br>HHI |         |
|                       |                        |                                                 |      |                 | (\$000)                        |                                   |                             |                |                 | (\$000)                        |                                   |                             |                | (\$000) |
| 87                    | 86                     | Broward HealthCare FCU                          | CU   | 4               | 88,700                         | 0                                 | 0                           | 0.00           | 0.00            | 4                              | 88,700                            | 0                           | 0.00           | 0.00    |
| 88                    | 87                     | Compass Financial FCU                           | CU   | 1               | 21,142                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 21,142                            | 0                           | 0.00           | 0.00    |
| 89                    | 88                     | Connect CU                                      | CU   | 2               | 56,686                         | 0                                 | 0                           | 0.00           | 0.00            | 2                              | 56,686                            | 0                           | 0.00           | 0.00    |
| 90                    | 89                     | Coral Community FCU                             | CU   | 1               | 37,683                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 37,683                            | 0                           | 0.00           | 0.00    |
| 91                    | 90                     | Dade County FCU                                 | CU   | 10              | 1,117,218                      | 0                                 | 0                           | 0.00           | 0.00            | 10                             | 1,117,218                         | 0                           | 0.00           | 0.00    |
| 92                    | 91                     | Educational FCU                                 | CU   | 9               | 1,475,353                      | 0                                 | 0                           | 0.00           | 0.00            | 9                              | 1,475,353                         | 0                           | 0.00           | 0.00    |
| 93                    | 92                     | Electricians' Local 349 CU                      | CU   | 1               | 3,839                          | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 3,839                             | 0                           | 0.00           | 0.00    |
| 94                    | 93                     | First Florida CU                                | CU   | 2               | 108,415                        | 0                                 | 0                           | 0.00           | 0.00            | 2                              | 108,415                           | 0                           | 0.00           | 0.00    |
| 95                    | 94                     | Guardians CU                                    | CU   | 1               | 50,684                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 50,684                            | 0                           | 0.00           | 0.00    |
| 96                    | 95                     | Hialeah Municipal Employees Federal Credit Unio | CU   | 1               | 9,825                          | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 9,825                             | 0                           | 0.00           | 0.00    |
| 97                    | 96                     | iTHINK Financial CU                             | CU   | 1               | 83,319                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 83,319                            | 0                           | 0.00           | 0.00    |
| 98                    | 97                     | JetStream FCU                                   | CU   | 4               | 183,518                        | 0                                 | 0                           | 0.00           | 0.00            | 4                              | 183,518                           | 0                           | 0.00           | 0.00    |
| 99                    | 98                     | JM Associates FCU                               | CU   | 1               | 25,442                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 25,442                            | 0                           | 0.00           | 0.00    |
| 100                   | 99                     | Justice FCU                                     | CU   | 2               | 98,692                         | 0                                 | 0                           | 0.00           | 0.00            | 2                              | 98,692                            | 0                           | 0.00           | 0.00    |
| 101                   | 100                    | Keys FCU                                        | CU   | 1               | 37,272                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 37,272                            | 0                           | 0.00           | 0.00    |
| 102                   | 101                    | Memorial Employees Financial Credit Union       | CU   | 6               | 83,643                         | 0                                 | 0                           | 0.00           | 0.00            | 6                              | 83,643                            | 0                           | 0.00           | 0.00    |
| 103                   | 102                    | Miami FCU                                       | CU   | 4               | 37,559                         | 0                                 | 0                           | 0.00           | 0.00            | 4                              | 37,559                            | 0                           | 0.00           | 0.00    |
| 104                   | 103                    | Miami Firefighters FCU                          | CU   | 1               | 160,137                        | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 160,137                           | 0                           | 0.00           | 0.00    |
| 105                   | 104                    | Miami Postal Service CU                         | CU   | 3               | 173,659                        | 0                                 | 0                           | 0.00           | 0.00            | 3                              | 173,659                           | 0                           | 0.00           | 0.00    |
| 106                   | 105                    | Navy FCU                                        | CU   | 1               | 467,961                        | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 467,961                           | 0                           | 0.00           | 0.00    |
| 107                   | 106                    | People's Alliance FCU                           | CU   | 1               | 35,495                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 35,495                            | 0                           | 0.00           | 0.00    |
| 108                   | 107                    | Pompano Beach City Employee CU                  | CU   | 1               | 23,948                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 23,948                            | 0                           | 0.00           | 0.00    |
| 109                   | 108                    | Power Financial CU                              | CU   | 6               | 537,944                        | 0                                 | 0                           | 0.00           | 0.00            | 6                              | 537,944                           | 0                           | 0.00           | 0.00    |
| 110                   | 109                    | PriorityONE CU                                  | CU   | 2               | 140,893                        | 0                                 | 0                           | 0.00           | 0.00            | 2                              | 140,893                           | 0                           | 0.00           | 0.00    |
| 111                   | 110                    | Publix Employees FCU                            | CU   | 1               | 143,546                        | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 143,546                           | 0                           | 0.00           | 0.00    |
| 112                   | 111                    | Self-Help CU                                    | CU   | 1               | 40,564                         | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 40,564                            | 0                           | 0.00           | 0.00    |
| 113                   | 112                    | Shaw-Ross Employees CU                          | CU   | 1               | 6,481                          | 0                                 | 0                           | 0.00           | 0.00            | 1                              | 6,481                             | 0                           | 0.00           | 0.00    |
| 114                   | 113                    | Space Coast CU                                  | CU   | 27              | 2,935,985                      | 0                                 | 0                           | 0.00           | 0.00            | 27                             | 2,935,985                         | 0                           | 0.00           | 0.00    |
| 115                   | 114                    | SUN CU                                          | CU   | 3               | 109,408                        | 0                                 | 0                           | 0.00           | 0.00            | 3                              | 109,408                           | 0                           | 0.00           | 0.00    |
| 116                   | 115                    | Tropical Financial CU                           | CU   | 5               | 754,891                        | 0                                 | 0                           | 0.00           | 0.00            | 5                              | 754,891                           | 0                           | 0.00           | 0.00    |
| 117                   | 116                    | University CU                                   | CU   | 4               | 207,101                        | 0                                 | 0                           | 0.00           | 0.00            | 4                              | 207,101                           | 0                           | 0.00           | 0.00    |
| 118                   | 117                    | We Florida Financial                            | CU   | 6               | 650,820                        | 0                                 | 0                           | 0.00           | 0.00            | 6                              | 650,820                           | 0                           | 0.00           | 0.00    |
| TOTALS:               |                        |                                                 |      | 1,122           | 296,462,696                    |                                   | 284,199,080                 | 100.00         | 682.84          | 1,122                          | 296,462,696                       | 284,199,080                 | 100.00         | 682.87  |

PRE-MERGER HHI: 683  
 POST-MERGER HHI: 683  
 HHI CHANGE: 0

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.  
 \*\* Pro Forma Ownership assumes that announced transactions have been completed.  
 \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.

**Midland-Gladwin, MI**

## Midland-Gladwin, MI - FRB Banking Market

Ownership info as of Sep 29 2025

DEPOSIT BASED HHI  
FRB Initial Screen \*

| Pre-Merger                        |                        |                                   |      |                 |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|-----------------------------------|------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                       | Type | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 6                                 |                        | Fifth Third Bancorp               | Bank | 1               | 62,559                                    | 100    | 62,559                                       | 4.08                               | 16.65          |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 5                                 |                        | Comerica Inc.                     | Bank | 1               | 109,613                                   | 100    | 109,613                                      | 7.15                               | 51.11          |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
|                                   | 4                      | Fifth Third Bancorp               | Bank |                 |                                           |        |                                              |                                    |                | 2               | 172,172                                   | 172,172                                      | 11.23                              | 126.09         |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                   |      |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 1                      | Huntington Bancshares Inc.        | Bank | 7               | 772,692                                   | 100    | 772,692                                      | 50.40                              | 2,539.68       | 7               | 772,692                                   | 772,692                                      | 50.40                              | 2,539.68       |
| 2                                 | 2                      | Horizon Bancorp Inc.              | Bank | 2               | 209,413                                   | 100    | 209,413                                      | 13.66                              | 186.54         | 2               | 209,413                                   | 209,413                                      | 13.66                              | 186.54         |
| 3                                 | 3                      | Isabella Bank Corp.               | Bank | 2               | 206,336                                   | 100    | 206,336                                      | 13.46                              | 181.10         | 2               | 206,336                                   | 206,336                                      | 13.46                              | 181.10         |
| 4                                 | 5                      | PNC Financial Services Group Inc. | Bank | 2               | 137,548                                   | 100    | 137,548                                      | 8.97                               | 80.48          | 2               | 137,548                                   | 137,548                                      | 8.97                               | 80.48          |
| 7                                 | 6                      | 1st State Financial Ltd.          | Bank | 1               | 35,033                                    | 100    | 35,033                                       | 2.28                               | 5.22           | 1               | 35,033                                    | 35,033                                       | 2.28                               | 5.22           |
| 8                                 | 7                      | Mercantile Bank Corp.             | Bank | 1               | 70                                        | 100    | 70                                           | 0.00                               | 0.00           | 1               | 70                                        | 70                                           | 0.00                               | 0.00           |
| 9                                 | 8                      | Dow Credit Union                  | CU   | 1               | 1,111,941                                 | 0      | 0                                            | 0.00                               | 0.00           | 1               | 1,111,941                                 | 0                                            | 0.00                               | 0.00           |
| 10                                | 9                      | Frankenmuth CU                    | CU   | 1               | 46,855                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 46,855                                    | 0                                            | 0.00                               | 0.00           |
| 11                                | 10                     | Health Advantage FCU              | CU   | 1               | 50,267                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 50,267                                    | 0                                            | 0.00                               | 0.00           |
| 12                                | 11                     | Jolt CU                           | CU   | 1               | 79,680                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 79,680                                    | 0                                            | 0.00                               | 0.00           |
| 13                                | 12                     | Members First CU                  | CU   | 3               | 191,043                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 191,043                                   | 0                                            | 0.00                               | 0.00           |
| 14                                | 13                     | United Bay Community CU           | CU   | 1               | 46,193                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 46,193                                    | 0                                            | 0.00                               | 0.00           |
| 15                                | 14                     | Wildfire CU                       | CU   | 1               | 168,918                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 168,918                                   | 0                                            | 0.00                               | 0.00           |
| TOTALS:                           |                        |                                   |      | 26              | 3,228,161                                 |        | 1,533,264                                    | 100.00                             | 3,060.77       | 26              | 3,228,161                                 | 1,533,264                                    | 100.00                             | 3,119.11       |

PRE-MERGER HHI: 3,061  
 POST-MERGER HHI: 3,119  
 HHI CHANGE: 58

## Footnotes:

\* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.  
 \*\* Pro Forma Ownership assumes that announced transactions have been completed.  
 \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.

**West Palm Beach, FL**



**West Palm Beach, FL - FRB Banking Market**  
**DEPOSIT BASED HHI**  
**FRB Initial Screen \***

Ownership info as of Sep 29 2025

| Pre-Merger                        |                        |                                    |        |                 |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------------------|------------------------|------------------------------------|--------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
| Pre<br>Merger<br>Rank             | Post<br>Merger<br>Rank | Institution                        | Type   | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| BUYER                             |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 12                                |                        | Fifth Third Bancorp                | Bank   | 15              | 1,103,388                                 | 100    | 1,103,388                                    | 1.74                               | 3.01           |                 |                                           |                                              |                                    |                |
| TARGET                            |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 28                                |                        | Comerica Inc.                      | Bank   | 4               | 275,074                                   | 100    | 275,074                                      | 0.43                               | 0.19           |                 |                                           |                                              |                                    |                |
| RESULTING INSTITUTION             |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 11                                |                        | Fifth Third Bancorp                | Bank   |                 |                                           |        |                                              |                                    |                | 19              | 1,378,462                                 | 1,378,462                                    | 2.17                               | 4.70           |
| OTHER INSTITUTIONS (Pro Forma **) |                        |                                    |        |                 |                                           |        |                                              |                                    |                |                 |                                           |                                              |                                    |                |
| 1                                 | 1                      | Bank of America Corp.              | Bank   | 40              | 10,632,916                                | 100    | 10,632,916                                   | 16.73                              | 279.79         | 40              | 10,632,916                                | 10,632,916                                   | 16.73                              | 279.79         |
| 2                                 | 2                      | JPMorgan Chase & Co.               | Bank   | 51              | 9,605,497                                 | 100    | 9,605,497                                    | 15.11                              | 228.33         | 51              | 9,605,497                                 | 9,605,497                                    | 15.11                              | 228.33         |
| 3                                 | 3                      | Wells Fargo & Co.                  | Bank   | 46              | 8,991,567                                 | 100    | 8,991,567                                    | 14.14                              | 200.08         | 46              | 8,991,567                                 | 8,991,567                                    | 14.14                              | 200.08         |
| 4                                 | 4                      | PNC Financial Services Group Inc.  | Bank   | 30              | 6,978,437                                 | 100    | 6,978,437                                    | 10.98                              | 120.52         | 30              | 6,978,437                                 | 6,978,437                                    | 10.98                              | 120.52         |
| 5                                 | 5                      | The Toronto-Dominion Bank          | Bank   | 25              | 4,481,627                                 | 100    | 4,481,627                                    | 7.05                               | 49.71          | 25              | 4,481,627                                 | 4,481,627                                    | 7.05                               | 49.71          |
| 6                                 | 6                      | Truist Financial Corp.             | Bank   | 36              | 3,968,782                                 | 100    | 3,968,782                                    | 6.24                               | 38.98          | 36              | 3,968,782                                 | 3,968,782                                    | 6.24                               | 38.98          |
| 7                                 | 7                      | Citigroup Inc.                     | Bank   | 10              | 2,329,000                                 | 100    | 2,329,000                                    | 3.66                               | 13.42          | 10              | 2,329,000                                 | 2,329,000                                    | 3.66                               | 13.42          |
| 8                                 | 8                      | Seacoast Banking Corp. of Florida  | Bank   | 12              | 1,828,992                                 | 100    | 1,828,992                                    | 2.88                               | 8.28           | 12              | 1,828,992                                 | 1,828,992                                    | 2.88                               | 8.28           |
| 9                                 | 9                      | Banco de Credito e Inversiones     | Bank   | 3               | 1,426,342                                 | 100    | 1,426,342                                    | 2.24                               | 5.03           | 3               | 1,426,342                                 | 1,426,342                                    | 2.24                               | 5.03           |
| 10                                | 10                     | Flagstar Financial Inc.            | Bank   | 11              | 1,415,370                                 | 100    | 1,415,370                                    | 2.23                               | 4.96           | 11              | 1,415,370                                 | 1,415,370                                    | 2.23                               | 4.96           |
| 11                                | 12                     | Valley National Bancorp            | Bank   | 6               | 1,238,910                                 | 100    | 1,238,910                                    | 1.95                               | 3.80           | 6               | 1,238,910                                 | 1,238,910                                    | 1.95                               | 3.80           |
| 13                                | 13                     | Northern Trust Corp.               | Bank   | 4               | 886,613                                   | 100    | 886,613                                      | 1.39                               | 1.95           | 4               | 886,613                                   | 886,613                                      | 1.39                               | 1.95           |
| 14                                | 14                     | First Horizon Corp.                | Bank   | 8               | 818,366                                   | 100    | 818,366                                      | 1.29                               | 1.66           | 8               | 818,366                                   | 818,366                                      | 1.29                               | 1.66           |
| 15                                | 15                     | BankUnited Inc.                    | Bank   | 8               | 780,191                                   | 100    | 780,191                                      | 1.23                               | 1.51           | 8               | 780,191                                   | 780,191                                      | 1.23                               | 1.51           |
| 16                                | 16                     | Pinnacle Financial Partners Inc.   | Bank   | 6               | 756,526                                   | 100    | 756,526                                      | 1.19                               | 1.42           | 6               | 756,526                                   | 756,526                                      | 1.19                               | 1.42           |
| 17                                | 17                     | SouthState Bank Corp.              | Bank   | 4               | 726,458                                   | 100    | 726,458                                      | 1.14                               | 1.31           | 4               | 726,458                                   | 726,458                                      | 1.14                               | 1.31           |
| 18                                | 18                     | Home BancShares Inc.               | Bank   | 5               | 590,487                                   | 100    | 590,487                                      | 0.93                               | 0.86           | 5               | 590,487                                   | 590,487                                      | 0.93                               | 0.86           |
| 19                                | 19                     | Regions Financial Corp.            | Bank   | 8               | 501,616                                   | 100    | 501,616                                      | 0.79                               | 0.62           | 8               | 501,616                                   | 501,616                                      | 0.79                               | 0.62           |
| 20                                | 20                     | EverBank Financial Corp.           | Bank   | 1               | 470,469                                   | 100    | 470,469                                      | 0.74                               | 0.55           | 1               | 470,469                                   | 470,469                                      | 0.74                               | 0.55           |
| 21                                | 21                     | Citizens Financial Group Inc.      | Bank   | 1               | 448,972                                   | 100    | 448,972                                      | 0.71                               | 0.50           | 1               | 448,972                                   | 448,972                                      | 0.71                               | 0.50           |
| 22                                | 22                     | Paradise Bancorp Inc.              | Bank   | 2               | 419,531                                   | 100    | 419,531                                      | 0.66                               | 0.44           | 2               | 419,531                                   | 419,531                                      | 0.66                               | 0.44           |
| 23                                | 23                     | TFS Financial Corp.                | Thrift | 4               | 804,429                                   | 50     | 402,215                                      | 0.63                               | 0.40           | 4               | 804,429                                   | 402,215                                      | 0.63                               | 0.40           |
| 24                                | 24                     | ConnectOne Bancorp Inc.            | Bank   | 1               | 358,884                                   | 100    | 358,884                                      | 0.56                               | 0.32           | 1               | 358,884                                   | 358,884                                      | 0.56                               | 0.32           |
| 25                                | 25                     | United Community Banks Inc.        | Bank   | 3               | 285,368                                   | 100    | 285,368                                      | 0.45                               | 0.20           | 3               | 285,368                                   | 285,368                                      | 0.45                               | 0.20           |
| 26                                | 26                     | Anchor Bancorp Inc.                | Bank   | 4               | 280,672                                   | 100    | 280,672                                      | 0.44                               | 0.19           | 4               | 280,672                                   | 280,672                                      | 0.44                               | 0.19           |
| 27                                | 27                     | First Citizens BancShares Inc.     | Bank   | 2               | 278,949                                   | 100    | 278,949                                      | 0.44                               | 0.19           | 2               | 278,949                                   | 278,949                                      | 0.44                               | 0.19           |
| 29                                | 28                     | Amerant Bancorp Inc.               | Bank   | 3               | 248,727                                   | 100    | 248,727                                      | 0.39                               | 0.15           | 3               | 248,727                                   | 248,727                                      | 0.39                               | 0.15           |
| 30                                | 29                     | National Bank Holdings Corp.       | Bank   | 1               | 197,393                                   | 100    | 197,393                                      | 0.31                               | 0.10           | 1               | 197,393                                   | 197,393                                      | 0.31                               | 0.10           |
| 31                                | 30                     | Beal Bank USA                      | Bank   | 1               | 137,502                                   | 100    | 137,502                                      | 0.22                               | 0.05           | 1               | 137,502                                   | 137,502                                      | 0.22                               | 0.05           |
| 32                                | 31                     | FNC Bancorp Inc.                   | Bank   | 3               | 131,929                                   | 100    | 131,929                                      | 0.21                               | 0.04           | 3               | 131,929                                   | 131,929                                      | 0.21                               | 0.04           |
| 33                                | 32                     | Commerce Bancshares Inc.           | Bank   | 1               | 122,228                                   | 100    | 122,228                                      | 0.19                               | 0.04           | 1               | 122,228                                   | 122,228                                      | 0.19                               | 0.04           |
| 34                                | 33                     | Canadian Imperial Bank of Commerce | Bank   | 2               | 79,929                                    | 100    | 79,929                                       | 0.13                               | 0.02           | 2               | 79,929                                    | 79,929                                       | 0.13                               | 0.02           |
| 35                                | 34                     | Ocean Bankshares Inc.              | Bank   | 1               | 63,932                                    | 100    | 63,932                                       | 0.10                               | 0.01           | 1               | 63,932                                    | 63,932                                       | 0.10                               | 0.01           |
| 36                                | 35                     | SNBNY Holdings Ltd.                | Bank   | 1               | 51,347                                    | 100    | 51,347                                       | 0.08                               | 0.01           | 1               | 51,347                                    | 51,347                                       | 0.08                               | 0.01           |
| 37                                | 36                     | BankFLORIDA Bancorp Inc.           | Bank   | 1               | 47,410                                    | 100    | 47,410                                       | 0.07                               | 0.01           | 1               | 47,410                                    | 47,410                                       | 0.07                               | 0.01           |
| 38                                | 37                     | Pacific National Bank              | Bank   | 1               | 44,915                                    | 100    | 44,915                                       | 0.07                               | 0.00           | 1               | 44,915                                    | 44,915                                       | 0.07                               | 0.00           |
| 39                                | 38                     | Cypress Capital Group Inc.         | Bank   | 1               | 40,236                                    | 100    | 40,236                                       | 0.06                               | 0.00           | 1               | 40,236                                    | 40,236                                       | 0.06                               | 0.00           |

## West Palm Beach, FL - FRB Banking Market

Ownership info as of Sep 29 2025

## DEPOSIT BASED HHI

## FRB Initial Screen \*

| Pre<br>Merger<br>Rank | Post<br>Merger<br>Rank | Institution                                    | Type   | Pre-Merger      |                                           |        |                                              |                                    |                | Post-Merger     |                                           |                                              |                                    |                |
|-----------------------|------------------------|------------------------------------------------|--------|-----------------|-------------------------------------------|--------|----------------------------------------------|------------------------------------|----------------|-----------------|-------------------------------------------|----------------------------------------------|------------------------------------|----------------|
|                       |                        |                                                |        | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weight | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI | Branch<br>Count | Total<br>Deposits<br>in Market<br>(\$000) | Weighted<br>Deposits in<br>Market<br>(\$000) | Weighted<br>Market<br>Share<br>(%) | Deposit<br>HHI |
| 40                    | 39                     | Evermore Bank                                  | Bank   | 1               | 24,516                                    | 100    | 24,516                                       | 0.04                               | 0.00           | 1               | 24,516                                    | 24,516                                       | 0.04                               | 0.00           |
| 41                    | 40                     | First Bank                                     | Bank   | 1               | 23,078                                    | 100    | 23,078                                       | 0.04                               | 0.00           | 1               | 23,078                                    | 23,078                                       | 0.04                               | 0.00           |
| 42                    | 41                     | ODNB Financial Corp.                           | Bank   | 1               | 21,626                                    | 100    | 21,626                                       | 0.03                               | 0.00           | 1               | 21,626                                    | 21,626                                       | 0.03                               | 0.00           |
| 43                    | 42                     | Bank OZK                                       | Bank   | 1               | 20,407                                    | 100    | 20,407                                       | 0.03                               | 0.00           | 1               | 20,407                                    | 20,407                                       | 0.03                               | 0.00           |
| 44                    | 43                     | National Bank of Canada                        | Bank   | 1               | 13,368                                    | 100    | 13,368                                       | 0.02                               | 0.00           | 1               | 13,368                                    | 13,368                                       | 0.02                               | 0.00           |
| 45                    | 44                     | KeyCorp                                        | Bank   | 1               | 9,325                                     | 100    | 9,325                                        | 0.01                               | 0.00           | 1               | 9,325                                     | 9,325                                        | 0.01                               | 0.00           |
| 46                    | 45                     | TrustCo Bank Corp NY                           | Thrift | 1               | 13,267                                    | 50     | 6,634                                        | 0.01                               | 0.00           | 1               | 13,267                                    | 6,634                                        | 0.01                               | 0.00           |
| 47                    | 46                     | Interamerican Bank A FSB                       | Thrift | 1               | 3,587                                     | 50     | 1,794                                        | 0.00                               | 0.00           | 1               | 3,587                                     | 1,794                                        | 0.00                               | 0.00           |
| 48                    | 47                     | Banescor USA                                   | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 49                    | 48                     | Bank of New York Mellon Corp.                  | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 50                    | 49                     | Esquire Financial Holdings Inc.                | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 51                    | 50                     | M&T Bank Corp.                                 | Bank   | 2               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 2               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 52                    | 51                     | VirtualBank - a Division of First Horizon Bank | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 53                    | 52                     | VirtualBank                                    | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 54                    | 53                     | Waterman Acquisition Group LLC                 | Bank   | 1               | 0                                         | 100    | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| 55                    | 54                     | Dort Financial CU                              | CU     | 4               | 500,812                                   | 0      | 0                                            | 0.00                               | 0.00           | 4               | 500,812                                   | 0                                            | 0.00                               | 0.00           |
| 56                    | 55                     | Firefighters First FCU                         | CU     | 1               | 139,116                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 139,116                                   | 0                                            | 0.00                               | 0.00           |
| 57                    | 56                     | First Choice CU                                | CU     | 2               | 136,754                                   | 0      | 0                                            | 0.00                               | 0.00           | 2               | 136,754                                   | 0                                            | 0.00                               | 0.00           |
| 58                    | 57                     | Gold Coast FCU                                 | CU     | 3               | 139,612                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 139,612                                   | 0                                            | 0.00                               | 0.00           |
| 59                    | 58                     | Guardians CU                                   | CU     | 3               | 152,051                                   | 0      | 0                                            | 0.00                               | 0.00           | 3               | 152,051                                   | 0                                            | 0.00                               | 0.00           |
| 60                    | 59                     | iTHINK Financial CU                            | CU     | 6               | 499,916                                   | 0      | 0                                            | 0.00                               | 0.00           | 6               | 499,916                                   | 0                                            | 0.00                               | 0.00           |
| 61                    | 60                     | Kinecta FCU                                    | CU     | 1               | 199,442                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 199,442                                   | 0                                            | 0.00                               | 0.00           |
| 62                    | 61                     | Power Financial CU                             | CU     | 2               | 179,315                                   | 0      | 0                                            | 0.00                               | 0.00           | 2               | 179,315                                   | 0                                            | 0.00                               | 0.00           |
| 63                    | 62                     | Publix Employees FCU                           | CU     | 1               | 143,547                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 143,547                                   | 0                                            | 0.00                               | 0.00           |
| 64                    | 63                     | South Atlantic FCU                             | CU     | 1               | 15,543                                    | 0      | 0                                            | 0.00                               | 0.00           | 1               | 15,543                                    | 0                                            | 0.00                               | 0.00           |
| 65                    | 64                     | Space Coast CU                                 | CU     | 2               | 217,480                                   | 0      | 0                                            | 0.00                               | 0.00           | 2               | 217,480                                   | 0                                            | 0.00                               | 0.00           |
| 66                    | 65                     | Tropical Financial CU                          | CU     | 1               | 150,978                                   | 0      | 0                                            | 0.00                               | 0.00           | 1               | 150,978                                   | 0                                            | 0.00                               | 0.00           |
| 67                    | 66                     | Velocity Community FCU                         | CU     | 4               | 417,331                                   | 0      | 0                                            | 0.00                               | 0.00           | 4               | 417,331                                   | 0                                            | 0.00                               | 0.00           |
| 68                    | 67                     | WSFS Financial Corp.                           | Thrift | 1               | 0                                         | 50     | 0                                            | 0.00                               | 0.00           | 1               | 0                                         | 0                                            | 0.00                               | 0.00           |
| TOTALS:               |                        |                                                |        | 414             | 66,870,052                                |        | 63,567,514                                   | 100.00                             | 968.63         | 414             | 66,870,052                                | 63,567,514                                   | 100.00                             | 970.14         |

PRE-MERGER HHI: 969  
 POST-MERGER HHI: 970  
 HHI CHANGE: 2

## Footnotes:

- \* FRB Initial Screen: Banks at 100%, Thrifts at 50%, Credit Unions at 0%.  
 \*\* Pro Forma Ownership assumes that announced transactions have been completed.  
 \*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.

## **Part B**

## I. Calhoun County

Eleven credit unions in the Calhoun County banking market warrant inclusion in the Federal Reserve’s competitive assessment based on prior precedent and guidance.<sup>1</sup> All eleven offer a wide range of consumer and commercial banking products, have branches that are accessible to the public, and have broad membership criteria. Measured at 50% weight, Kellogg has 8.21% share, Advia Credit Union has 4.96% share, Marshall has 4.83% share, Honor Credit Union has 3.97% share, Omni has 3.91% share, United Federal has 2.00% share, American 1 has 1.61% share, Consumers has 1.59% share, Ignite / BlueOx has 1.27% share, Kalsee has 0.91% share, and Consumers Professional has 0.74% share of deposits.<sup>2</sup> Below is a description of each credit union, including a summary of its commercial lending activities, membership criteria, accessibility to the public, and non-exhaustive examples of banking products offered.<sup>3</sup> After adjusting to reflect competition from these credit unions, the level of concentration in the Calhoun County banking market as measured by the HHI would increase by 229 points, from 802 to 1,030 points, and falls within the safe harbor.

### A. Advia Credit Union

| Banking Products Offered                                                                                                                              | Accessibility            | Membership Criteria                                                                                                                                         | C&I Ratio |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Checking accounts<br>Savings accounts<br>Retirement accounts<br>Home mortgages<br>Vehicle loans<br>Credit cards<br>Personal loans<br>Commercial loans | Accessible to the public | Anyone related to a current member or who lives, works, worships, or attends school in all counties in Michigan’s lower peninsula, including Calhoun County | 0.49%     |

<sup>1</sup> The Calhoun County banking market is made up of the County of Calhoun. *See* Federal Reserve Bank of St. Louis (Oct. 9, 2025), <https://cassidi.stlouisfed.org/markets/26250>; FAQ 18.

<sup>2</sup> An additional credit union in Calhoun County, Grand Trunk Battle Creek Employees FCU, is not included in the HHI calculation because it has a limited field of membership. *See* FAQ 18.

<sup>3</sup> The summary table also notes the commercial & industrial (“C&I”) lending of each credit union as a percentage of its assets, with C&I lending defined as C&I loans, unsecured business loans, and unsecured revolving lines of credit for business purposes reported in the relevant credit union’s most recent call report. *See* FAQ 19.

Advia Credit Union has two branches in Calhoun County and ten in nearby Kalamazoo.<sup>4</sup> The Calhoun County branches, located in Battle Creek, maintain standard business hours and are accessible to the public.<sup>5</sup> Membership is open to people who live, work, worship, or attend school in eligible counties, including Calhoun County, or those who are related to a current member,<sup>6</sup> and is therefore open to 100% of the market population. It is on Forbes’s list of Best-In-State Credit Unions for 2025.<sup>7</sup>

Advia offers various commercial lending options, including commercial real estate loans, term loans, lines of credit, agricultural loans, and a business credit card.<sup>8</sup> It also has a commercial lending team to support its operations.<sup>9</sup> According to its website, the “commercial lending team goes beyond the role of a lender, actively partnering with local businesses to drive their success” and “provides personalized support, strategic advice, and valuable connections.”<sup>10</sup> In a 2023 video, a commercial lending manager noted that the team is “big enough to do everything you need to do and small enough to know your name.”<sup>11</sup> Another commercial lender noted that the team has “a lot of experience, so we can craft solutions to their problems rather than giving them an a la carte menu to choose from that might or might not actually fit their needs.”<sup>12</sup>

## B. American 1 Credit Union

| Banking Products Offered                                     | Accessibility            | Membership Criteria                                | C&I Ratio |
|--------------------------------------------------------------|--------------------------|----------------------------------------------------|-----------|
| Savings accounts<br>Checking accounts<br>Investment accounts | Accessible to the public | Open to all but requires membership in Community 1 | 0.05%     |

<sup>4</sup> Advia Credit Union (Oct. 16, 2025), Advia Credit Union Branches & ATMs - Locations in MI, WI, & IL.

<sup>5</sup> *Id.*

<sup>6</sup> Advia Credit Union, <https://www.adviacu.org/become-a-member>.

<sup>7</sup> Forbes, America’s Best Credit Unions In Each State (June 17, 2025), <https://www.forbes.com/lists/best-in-state-credit-unions/>.

<sup>8</sup> Advia Credit Union (Oct. 9, 2025), Commercial Lending Solutions | Advia Credit Union.

<sup>9</sup> Advia Credit Union (Oct. 9, 2025), Contact Commercial Lending.

<sup>10</sup> Advia Credit Union (Oct. 9, 2025), Commercial Lending Solutions | Advia Credit Union.

<sup>11</sup> *Advia Commercial Lending: It’s a Partnership*, YouTube, <https://www.youtube.com/watch?v=eIN0qFrvtw4>.

<sup>12</sup> *Id.*

| Banking Products Offered | Accessibility | Membership Criteria          | C&I Ratio |
|--------------------------|---------------|------------------------------|-----------|
| Loans<br>Credit Cards    |               | Cooperative, which costs \$3 |           |

American 1 Credit Union has two locations in Calhoun County, one in Marshall and another in Battle Creek, both of which are accessible to the public.<sup>13</sup> The Battle Creek branch was recently opened in 2024. President and CEO Martha Fuerstenau remarked at the branch opening that “our Battle Creek members remain a priority for us, and we are excited to be able to offer a second convenient banking location in Calhoun County.”<sup>14</sup> Membership in American 1 is open to anyone, although it requires membership in Community 1 Cooperative, a co-op that provides discounts and services to its members. Membership in Community 1 costs \$3 but is open to all.<sup>15</sup>

American 1 offers a full range of “loan options to fit your situation and to help you obtain your business goals”, including business loans, secured and unsecured loans, and a business credit card. American 1 has business lending professionals.<sup>16</sup> On its website, it promises that “[o]ur designated Small Business Lending Specialist will work with you every step of the way. They will learn your business and build a lending plan catered to your organization.”<sup>17</sup>

### C. Consumers Credit Union

| Banking Products Offered                                                                                                     | Accessibility            | Membership Criteria                              | C&I Ratio |
|------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------------------------------|-----------|
| Savings accounts<br>Checking accounts<br>Youth accounts<br>Mortgages<br>Personal loans<br>Recreational loans<br>Credit cards | Accessible to the public | Anyone who lives, works, or worships in Michigan | 2.09%     |

<sup>13</sup> American 1 Credit Union (Oct. 15, 2025), Locations - American 1 Credit Union.

<sup>14</sup> American 1 Credit Union, *American 1 Credit Union Announces Second Branch Location in Calhoun County* (July 2, 2024), Battle Creek Announcement - American 1 Credit Union.

<sup>15</sup> American 1 Credit Union (Oct. 15, 2025), Become a Member - American 1 Credit Union.

<sup>16</sup> American 1 Credit Union (Oct. 15, 2025), Small Business Loans - American 1 Credit Union.

<sup>17</sup> *Id.*

Consumers Credit Union has one branch in Calhoun County located in Battle Creek, with a second scheduled to open soon in Marshall.<sup>18</sup> It also has a branch in the neighboring Coldwater banking market and several in nearby Kalamazoo. The branch has regular business hours and is accessible to the public.<sup>19</sup> Membership is open to anyone who lives, works, or worships in Michigan,<sup>20</sup> and is therefore open to 100% of the market population.

It offers a wide range of business banking products and services. Business owners can open checking, savings, money market, or CD accounts, as well as access payroll and merchant services.<sup>21</sup> Consumers also advertises its business credit products such as commercial real estate mortgages, SBA loans, equipment and vehicle loans, lines of credit, and credit cards, stating that it is “able to make financing decisions faster and with less hassle than the big guys.”<sup>22</sup>

Consumers Credit Union has a robust and expanding commercial lending operation. According to its 2024 Impact Report, the credit union made over \$260 million in business loans.<sup>23</sup> It has a team of six commercial loan officers, a small business banking specialist, an internal sales portfolio manager, a director of cash management, and a vice president of business services.<sup>24</sup> Eric Stoll, who serves as vice president of business services, was recently hired in October 2025.<sup>25</sup> The news release announcing his hiring noted that his “extensive background in commercial underwriting and lending . . . positions him well to guide the business services team into its next chapter.”<sup>26</sup> It stated that Stoll “will focus on growing business loans and deposits, expanding cash

---

<sup>18</sup> Consumers Credit Union (Oct. 10, 2025), Marshall, MI Credit Union & Office Space | Consumers Credit Union.

<sup>19</sup> Consumers Credit Union (Oct. 15, 2025), Battle Creek, MI Credit Union, Drive-Thru, & ATM | Consumers Credit Union.

<sup>20</sup> Consumers Credit Union (Oct. 15, 2025), Membership Eligibility | Consumers Credit Union.

<sup>21</sup> Consumers Credit Union (Oct. 10, 2025), Business Banking Services | Consumers Credit Union.

<sup>22</sup> Business Banking Services | Consumers Credit Union.

<sup>23</sup> Consumers Credit Union, *2024 Community Impact Report*, 2024\_Consumers\_Community\_Impact\_Report\_FINAL.pdf.

<sup>24</sup> Consumers Credit Union (Oct. 10, 2025), Business Development Managers | Consumers Credit Union.

<sup>25</sup> Consumers Credit Union, *Consumers Credit Union Announces Key Updates Across West Michigan*, (Oct. 2, 2025), Consumers Credit Union Announces Key Updates Across West Michigan | Consumers Credit Union.

<sup>26</sup> *Id.*



management products and services, and managing risk to support the credit union’s long-term financial goals.”<sup>27</sup>

In addition, its 2024 Community Impact Report shows substantial company growth. In 2024, the credit union hired 82 new employees, opened two new retail office locations, and planned to add three new offices in 2025.<sup>28</sup> In June 2025, it opened a new office in Roosevelt Park and an interactive teller station at the Muskegon Farmers Market.<sup>29</sup> The Roosevelt Park opening ceremony included “representatives from the Muskegon Lakeshore Chamber of Commerce.”<sup>30</sup> A news release announcing the new locations noted that “Consumers continues to grow its presence in West Michigan and reinforces their mission to support both personal and business financial needs across the region.” In July 2025, construction began on the third location in Rockford, which is scheduled to open in 2026.<sup>31</sup> President and CEO Scott Sylvester commented that it marked “another exciting step in our continued growth across West Michigan.”<sup>32</sup> The office will include “dedicated spaces for loan and member service consultations.”<sup>33</sup>

#### **D. Consumers Professional Credit Union**

| <b>Banking Products Offered</b>                                | <b>Accessibility</b>     | <b>Membership Criteria</b>                                                      | <b>C&amp;I Ratio</b> |
|----------------------------------------------------------------|--------------------------|---------------------------------------------------------------------------------|----------------------|
| Checking accounts<br>Savings accounts<br>Loans<br>Credit Cards | Accessible to the public | Anyone who lives, works, or worships in 24 eligible counties, including Calhoun | 0.06%                |

---

<sup>27</sup> *Id.*

<sup>28</sup> Consumers Credit Union, *2024 Community Impact Report*, 2024\_Consumers\_Community\_Impact\_Report\_FINAL.pdf.

<sup>29</sup> Consumers Credit Union, *Consumers Credit Union Celebrates Two Ribbon Cuttings for Roosevelt Park and Farmers Market*, Consumers Credit Union (June 25, 2025), Consumers Credit Union Celebrates Two Ribbon Cuttings for Roosevelt Park and Farmers Market | Consumers Credit Union.

<sup>30</sup> *Id.*

<sup>31</sup> Consumers Credit Union, *Consumers Credit Union Breaks Ground on Office Location in Rockford*, (July 30, 2025), Consumers Credit Union Breaks Ground on Office Location in Rockford | Consumers Credit Union. Rockford is within the Grand Rapids Banking Market.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

Consumers Professional Credit Union has one branch in Calhoun County that is located in Battle Creek and is accessible to the public.<sup>34</sup> Membership is open to anyone who lives, works, or worships in 24 eligible counties, including Calhoun County,<sup>35</sup> and is therefore open to 100% of the market population.

Consumers Professional offers a range of business loans, including commercial real estate loans, commercial equipment loans, commercial credit cards, and SBA loans.<sup>36</sup>

#### **E. Honor Credit Union**

| <b>Banking Products Offered</b>                                                       | <b>Accessibility</b>     | <b>Membership Criteria</b>                                                                                                                           | <b>C&amp;I Ratio</b> |
|---------------------------------------------------------------------------------------|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| Savings accounts<br>Checking accounts<br>Loans<br>Credit cards<br>Investment services | Accessible to the public | Anyone who lives, works, worships, or studies in Michigan, or is an immediate family member of a current Honor member, regardless of where they live | 2.09%                |

Honor Credit Union has three branches in Calhoun County, all located in Battle Creek and accessible to the public.<sup>37</sup> Membership is open to anyone who lives, works, worships, or studies in Michigan, or is an immediate family member of a current Honor member, regardless of where they live,<sup>38</sup> and is therefore open to 100% of the market population. In July 2025, Leader Publications named Honor Credit Union as “Best Credit Union in Michiana.”<sup>39</sup>

It offers a full range of business loans, including real estate loans, small business loans, installment loans, lines of credit, and credit cards. It has a team of commercial loan officers and

<sup>34</sup> Consumers Professional Credit Union (Oct. 15, 2025), Contact Us.

<sup>35</sup> Consumers Professional Credit Union (Oct. 15, 2025), CPCU.CO.

<sup>36</sup> Consumers Professional Credit Union (Oct. 15, 2025), Business Loans & Services.

<sup>37</sup> Honor Credit Union (Oct. 15, 2025), Battle Creek - Beckley Member Center | Honor Credit Union; Battle Creek - Helmer Member Center | Honor Credit Union; Honor Credit Union- Battle Creek – Urbandale.

<sup>38</sup> Honor Credit Union (Oct. 15, 2025), Become A Member | Honor Credit Union.

<sup>39</sup> Honor Credit Union (Oct. 15, 2025), [Honor Credit Union Named Best of the Best in Michiana](#).

community development officers, led by a Director of Commercial Relationships and a Vice President of Business Services.<sup>40</sup> One commercial loan officer and one community development officer are assigned to the Calhoun County area. Its community development officers help members “start a business, open accounts, plan for retirement, manage [their] books” or connect them with a business lending expert.<sup>41</sup>

#### F. Ignite / BlueOx Credit Union

| Banking Products Offered                                       | Accessibility            | Membership Criteria                                                                                                                             | C&I Ratio |
|----------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Checking accounts<br>Savings accounts<br>Loans<br>Credit cards | Accessible to the public | Anyone who lives, works, worships, or attends school in Michigan, or is an immediate family member of a current member, regardless of residence | 0.26%     |

BlueOx Credit Union, a division of Ignite Credit Union, has two branches in Calhoun County. Both locations, in Albion and Battle Creek, are accessible to the public.<sup>42</sup> Membership is open to anyone who lives, works, worships, or attends school in Michigan, or who is an immediate family member of a current member,<sup>43</sup> and is therefore open to 100% of the market population.

BlueOx is involved with small business initiatives in Calhoun County. It sponsored an on-site, eight-week, no-cost training program called “Fundamentals of Small Business Success,” “designed to empower entrepreneurs to realize their dreams and foster growth in the local economy, and to provide participants with the essential skills and knowledge required to successfully start a small business.”<sup>44</sup> BlueOx conducts the program in partnership with the Michigan Small Business Development Center, Albion Economic Development Corporation,

<sup>40</sup> Honor Credit Union (Oct. 9, 2025), Business Team | Honor Credit Union.

<sup>41</sup> *Id.*

<sup>42</sup> BlueOx Credit Union (Oct. 15, 2025), Location & Hours - BlueOx Credit Union.

<sup>43</sup> BlueOx Credit Union (Oct. 15, 2025), Ignite Credit Union.

<sup>44</sup> BlueOx Credit Union, *Michigan Small Business Development Center (Michigan SBDC) Launches No-Cost Educational Series: “Fundamentals of Small Business Success”* (Oct. 10, 2025), News & Events - BlueOx Credit Union.

Greater Albion Chamber of Commerce, and Albion College. Steve Cobb, President of BlueOx, stated in connection with the program that “BlueOx Credit Union is committed to being an active part of our local communities and is proud to support organizations that cause change, improve lives, and drive progress. We are honored to join Michigan SBDC and the Albion Economic Development Corporation in their mission to empower small business owners and provide them with the resources and guidance they need to succeed.”<sup>45</sup> It’s website states that its commercial loan offering is “coming soon.”<sup>46</sup>

#### **G. Kalsee Credit Union**

| <b>Banking Products Offered</b>                                                                    | <b>Accessibility</b>     | <b>Membership Criteria</b>                                                                                         | <b>C&amp;I Ratio</b> |
|----------------------------------------------------------------------------------------------------|--------------------------|--------------------------------------------------------------------------------------------------------------------|----------------------|
| Savings accounts<br>Checking accounts<br>Personal loans<br>Home loans<br>Credit cards<br>Mortgages | Accessible to the public | Live, work, or attend school in Allegan, Barry, Branch, Calhoun, Cass, Kalamazoo, St. Joseph or Van Buren counties | 0.60%                |

Kalsee Credit Union has one branch in Calhoun County located in Battle Creek, and several more in nearby Kalamazoo.<sup>47</sup> The branch maintains regular business hours and is accessible to the public. Membership is open to anyone who lives, works, or attends school in eight eligible counties, including Calhoun County,<sup>48</sup> and is therefore open to 100% of the market population.

It offers businesses real estate loans, equipment & lines of credit loans, and credit cards. It also offers a business checking account and merchant services such as point of sales systems,

---

<sup>45</sup> *Id.*

<sup>46</sup> BlueOx Credit Union (Oct. 15, 2025), <https://www.blueoxcu.org/business/elavon-payment-processing>.

<sup>47</sup> Kalsee Credit Union (Oct. 15, 2025), Branch Locations & Hours | Kalsee Credit Union | Michigan.

<sup>48</sup> Kalsee Credit Union (Oct. 15, 2025), Kalsee Credit Union.

Apple Pay, Samsung Pay, and Google Wallet. Kalsee’s commercial lending manager has over 10 years of industry experience.<sup>49</sup>

## H. Kellogg Community Credit Union

| Banking Products Offered                                                              | Accessibility | Membership Criteria                                                                              | C&I Ratio |
|---------------------------------------------------------------------------------------|---------------|--------------------------------------------------------------------------------------------------|-----------|
| Savings accounts<br>Checking accounts<br>Retirement accounts<br>Loans<br>Credit cards | Accessibility | Anyone who lives, works, worships, or attends school in Michigan or relatives of current members | 0.73%     |

Kellogg Community Credit Union has six branches in Calhoun County, five in Battle Creek and one in Marshall, all of which are accessible to the general public.<sup>50</sup> People who live, work, worship, or attend school in Michigan or are related to a current member are eligible to join Kellogg,<sup>51</sup> and is therefore open to 100% of the market population. In February 2025, readers of the Battle Creek Shopper voted Kellogg Community Credit Union as “Best Credit Union,” “Best Bank,” and “Best Mortgage Lender,” and in August 2025, readers of the The Morning Star and The Recorder newspapers (covering Calhoun and Jackson Counties) voted Kellogg Community Credit Union “Best Bank/Credit Union.”<sup>52</sup>

Its business lending products include commercial real estate loans, SBA loans, lines of credit, equipment and vehicle loans, and business credit cards.<sup>53</sup> It also provides merchant services through a third-party. Its business lending manager “guides a team of business development officers, business services support, and a business services analyst to help local business owners achieve their dreams of expanding their businesses through lending services.”<sup>54</sup>

<sup>49</sup> Kalsee Credit Union (Oct. 10, 2025), Business Real Estate Loans | Kalsee Credit Union | Michigan.

<sup>50</sup> KCCU (Oct. 15, 2025), KCCU Locations and ATMs/LIVE Tellers Michigan - KCCU.

<sup>51</sup> KCCU (Oct. 15, 2025), KCCU Membership Eligibility Michigan - KCCU.

<sup>52</sup> KCCU (Oct. 15, 2025), [KCUU News Michigan](#).

<sup>53</sup> KCCU (Oct. 10, 2025), KCCU Business Lending Michigan - KCCU.

<sup>54</sup> KCCU (Oct. 10, 2025), KCCU Meet the Team Business Services Michigan - KCCU.

## I. Marshall Community Credit Union

| Banking Products Offered                                       | Accessibility            | Membership Criteria                                                                                                                           | C&I Ratio |
|----------------------------------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Checking accounts<br>Savings accounts<br>Loans<br>Credit cards | Accessible to the public | Anyone who lives, works, worships, or attends school in Calhoun, Jackson, Hillsdale, Branch, St. Joseph, Kalamazoo, Barry, and Eaton counties | 0.43%     |

Marshall Community Credit Union has two locations in Calhoun County, one in Battle Creek and another in Marshall.<sup>55</sup> Membership is open to anyone who lives, works, worships, or attends school in eight eligible counties, including Calhoun County,<sup>56</sup> and is therefore open to 100% of the market population. It offers commercial real estate loans, business term loans, and business lines of credit, in addition to digital banking services and merchant card services.<sup>57</sup> In a September 2025 post, it highlighted its advantages in business banking, including “competitive rates,” “local decision making,” “quick answers,” and “a team that knows the community inside and out, and cares about your success.”<sup>58</sup>

## J. Omni Community Credit Union

| Banking Products Offered                                       | Accessibility            | Membership Criteria                                              | C&I Ratio |
|----------------------------------------------------------------|--------------------------|------------------------------------------------------------------|-----------|
| Savings accounts<br>Checking accounts<br>Loans<br>Credit cards | Accessible to the public | Anyone who lives, works, worships, or attends school in Michigan | 0.32%     |

---

<sup>55</sup> Marshall Community Credit Union (Oct. 15, 2025), Locations & Hours | Marshall Community CU | Marshall, Battle Creek, Coldwater - MI.

<sup>56</sup> Marshall Community Credit Union (Oct. 15, 2025), Become a Member | Marshall Community CU | Marshall, Battle Creek, Coldwater - MI.

<sup>57</sup> Marshall Community Credit Union (Oct. 10, 2025), Business Loans | Marshall Community CU | Marshall, Battle Creek, Coldwater - MI.

<sup>58</sup> Marshall Community Credit Union (Oct. 10, 2025), [Why Local Businesses Choose MCCU As Their Banking Partner](#).

Omni Community Credit Union has four locations in Calhoun County, all in Battle Creek.<sup>59</sup> Three are accessible to the public.<sup>60</sup> Membership is open to anyone who lives, works, worships, or attends school in Michigan<sup>61</sup> and is therefore open to 100% of the market population.

Omni offers a range of commercial loans, such as for commercial real estate, commercial and industrial equipment, and business lines of credit.<sup>62</sup> It also provides merchant services to businesses.

#### K. United Federal Credit Union

| Banking Products Offered                                                                                                                         | Accessibility            | Membership Criteria                                                                                                                                                            | C&I Ratio         |
|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Checking accounts<br>Savings accounts<br>Retirement accounts<br>Mortgages<br>Vehicle loans<br>Credit cards<br>Personal loans<br>Commercial loans | Accessible to the public | Anyone who lives, works, worships or attends school near a branch, or is the immediate family member of an existing member, or works for or is retired from a corporate member | N/A <sup>63</sup> |

United Federal Credit Union has one location in Calhoun County.<sup>64</sup> Located in Battle Creek and accessible to the public, the branch was recently opened in 2024 as part of an effort to “expand[] strategically to enhance the Member experience through convenient and user-friendly

<sup>59</sup> Omni Community Credit Union (Oct. 15, 2025), About OMNI CU OMNI Community Credit Union. A fourth location at 1 Denso Road, Battle Creek, MI 49037 is located on a military base and is not accessible to the public.

<sup>60</sup> *Id.*

<sup>61</sup> Omni Community Credit Union (Oct. 15, 2025), About OMNI CU OMNI Community Credit Union.

<sup>62</sup> OMNI Credit Union (Oct. 10, 2025), Business Banking OMNI Community Credit Union.

<sup>63</sup> United Federal does not have a call report posted and its total commercial loans are not publicly available.

<sup>64</sup> United Federal Credit Union (Oct. 21, 2025), <https://unitedfcu.com/contact-us/atmbranchlocator>.



locations.”<sup>65</sup> Membership is open to anyone who lives, works, worships, or attends school near a branch in Michigan, is an immediate family member of an existing member, or works for or has retired from any of its over 900 corporate members<sup>66</sup> and is therefore open to 100% of the market population.

United Federal offers a range of commercial banking products, including term loans, lines of credit, real estate loans, and SBA loans.<sup>67</sup> In addition, it offers an extensive suite of Treasury management tools, such as digital banking, merchant services, and mobile deposits.<sup>68</sup>

It has commercial loan officers in branches across Michigan, including a business loan officer who covers the Battle Creek area.<sup>69</sup> According to its website, the Business Loan Officer is “responsible for providing quality business lending expertise for small to moderate sized businesses in southwest Michigan.”<sup>70</sup> The loan officer offers “financial counseling and bring[s] product awareness to credit union members regarding their business financing needs and generating investment quality business loans.”<sup>71</sup>

---

<sup>65</sup> United Federal Credit Union, *2024 Annual Meeting Minutes*, <https://unitedfcu.com/getContentAsset/ab374831-34e2-48e2-84db-4e649bb8b161/73aabf56-e6e5-4330-95a3-5f2a270a1d2b/24Feb20-Annual-Meeting-Minutes.pdf?language=en>.

<sup>66</sup> United Federal Credit Union (Oct. 21, 2025), <https://unitedfcu.com/about-us/why-united/why-join>.

<sup>67</sup> United Federal Credit Union (Oct. 21, 2025), *Business Loans* | United Federal Credit Union.

<sup>68</sup> United Federal Credit Union (Oct. 21, 2025), *Treasury Management* | United Federal Credit Union.

<sup>69</sup> United Federal Credit Union (Oct. 21, 2025), <https://unitedfcu.com/business/borrow/commercial-loan-officers>.

<sup>70</sup> United Federal Credit Union (Oct. 21, 2025), <https://unitedfcu.com/business/borrow/commercial-loan-officers/joshua-pratt>.

<sup>71</sup> *Id.*

## **Part C**

**Calhoun, MI - County Banking Market**  
**DEPOSIT BASED HHI**  
**FRB Approach including qualifying credit unions \***

Ownership info as of Oct 03 2025

| Pre-Merger                        |                  |                                        |        |              |                                  |        |                                     |                           |             | Post-Merger  |                                  |                                     |                           |             |
|-----------------------------------|------------------|----------------------------------------|--------|--------------|----------------------------------|--------|-------------------------------------|---------------------------|-------------|--------------|----------------------------------|-------------------------------------|---------------------------|-------------|
| Pre Merger Rank                   | Post Merger Rank | Institution                            | Type   | Branch Count | Total Deposits in Market (\$000) | Weight | Weighted Deposits in Market (\$000) | Weighted Market Share (%) | Deposit HHI | Branch Count | Total Deposits in Market (\$000) | Weighted Deposits in Market (\$000) | Weighted Market Share (%) | Deposit HHI |
| BUYER                             |                  |                                        |        |              |                                  |        |                                     |                           |             |              |                                  |                                     |                           |             |
| 4                                 |                  | Fifth Third Bancorp                    | Bank   | 1            | 206,598                          | 100    | 206,598                             | 10.29                     | 105.92      |              |                                  |                                     |                           |             |
| TARGET                            |                  |                                        |        |              |                                  |        |                                     |                           |             |              |                                  |                                     |                           |             |
| 3                                 |                  | Comerica Inc.                          | Bank   | 2            | 222,866                          | 100    | 222,866                             | 11.10                     | 123.26      |              |                                  |                                     |                           |             |
| RESULTING INSTITUTION             |                  |                                        |        |              |                                  |        |                                     |                           |             |              |                                  |                                     |                           |             |
| 1                                 |                  | Fifth Third Bancorp                    | Bank   |              |                                  |        |                                     |                           |             | 3            | 429,464                          | 429,464                             | 21.39                     | 457.70      |
| OTHER INSTITUTIONS (Pro Forma **) |                  |                                        |        |              |                                  |        |                                     |                           |             |              |                                  |                                     |                           |             |
| 1                                 | 2                | Huntington Bancshares Inc.             | Bank   | 4            | 298,300                          | 100    | 298,300                             | 14.86                     | 220.82      | 4            | 298,300                          | 298,300                             | 14.86                     | 220.82      |
| 2                                 | 3                | Southern Michigan Bancorp., Inc.       | Bank   | 3            | 231,528                          | 100    | 231,528                             | 11.53                     | 133.03      | 3            | 231,528                          | 231,528                             | 11.53                     | 133.03      |
| 5                                 | 4                | Kellogg Community CU                   | CU     | 6            | 329,646                          | 50     | 164,823                             | 8.21                      | 67.42       | 6            | 329,646                          | 164,823                             | 8.21                      | 67.42       |
| 6                                 | 5                | PNC Financial Services Group Inc.      | Bank   | 1            | 102,920                          | 100    | 102,920                             | 5.13                      | 26.29       | 1            | 102,920                          | 102,920                             | 5.13                      | 26.29       |
| 7                                 | 6                | Advia CU                               | CU     | 2            | 198,950                          | 50     | 99,475                              | 4.96                      | 24.56       | 2            | 198,950                          | 99,475                              | 4.96                      | 24.56       |
| 8                                 | 7                | Marshall Community CU                  | CU     | 2            | 193,746                          | 50     | 96,873                              | 4.83                      | 23.29       | 2            | 193,746                          | 96,873                              | 4.83                      | 23.29       |
| 9                                 | 8                | Honor CU                               | CU     | 3            | 159,402                          | 50     | 79,701                              | 3.97                      | 15.76       | 3            | 159,402                          | 79,701                              | 3.97                      | 15.76       |
| 10                                | 9                | Omni Community CU                      | CU     | 4            | 157,033                          | 50     | 78,517                              | 3.91                      | 15.30       | 4            | 157,033                          | 78,517                              | 3.91                      | 15.30       |
| 11                                | 10               | HCB Financial Corp.                    | Bank   | 1            | 66,200                           | 100    | 66,200                              | 3.30                      | 10.88       | 1            | 66,200                           | 66,200                              | 3.30                      | 10.88       |
| 12                                | 11               | Old National Bancorp                   | Bank   | 1            | 66,092                           | 100    | 66,092                              | 3.29                      | 10.84       | 1            | 66,092                           | 66,092                              | 3.29                      | 10.84       |
| 13                                | 12               | CNB Community Bancorp Inc.             | Bank   | 1            | 50,352                           | 100    | 50,352                              | 2.51                      | 6.29        | 1            | 50,352                           | 50,352                              | 2.51                      | 6.29        |
| 14                                | 13               | United Federal CU                      | CU     | 1            | 80,327                           | 50     | 40,164                              | 2.00                      | 4.00        | 1            | 80,327                           | 40,164                              | 2.00                      | 4.00        |
| 15                                | 14               | Flagstar Financial Inc.                | Bank   | 1            | 38,959                           | 100    | 38,959                              | 1.94                      | 3.77        | 1            | 38,959                           | 38,959                              | 1.94                      | 3.77        |
| 16                                | 15               | American 1 CU                          | CU     | 2            | 64,761                           | 50     | 32,381                              | 1.61                      | 2.60        | 2            | 64,761                           | 32,381                              | 1.61                      | 2.60        |
| 17                                | 16               | Consumers CU                           | CU     | 1            | 64,027                           | 50     | 32,014                              | 1.59                      | 2.54        | 1            | 64,027                           | 32,014                              | 1.59                      | 2.54        |
| 18                                | 17               | Ignite Credit Union                    | CU     | 2            | 50,846                           | 50     | 25,423                              | 1.27                      | 1.60        | 2            | 50,846                           | 25,423                              | 1.27                      | 1.60        |
| 19                                | 18               | Homestead Savings Bank                 | Thrift | 1            | 48,002                           | 50     | 24,001                              | 1.20                      | 1.43        | 1            | 48,002                           | 24,001                              | 1.20                      | 1.43        |
| 20                                | 19               | KALSEE CU                              | CU     | 1            | 36,671                           | 50     | 18,336                              | 0.91                      | 0.83        | 1            | 36,671                           | 18,336                              | 0.91                      | 0.83        |
| 21                                | 20               | Sturgis Bancorp Inc.                   | Bank   | 2            | 17,062                           | 100    | 17,062                              | 0.85                      | 0.72        | 2            | 17,062                           | 17,062                              | 0.85                      | 0.72        |
| 22                                | 21               | Consumers Professional CU              | CU     | 1            | 29,638                           | 50     | 14,819                              | 0.74                      | 0.54        | 1            | 29,638                           | 14,819                              | 0.74                      | 0.54        |
| 23                                | 22               | Grand Trunk Battle Creek Employees FCU | CU     | 1            | 0                                | 50     | 0                                   | 0.00                      | 0.00        | 1            | 0                                | 0                                   | 0.00                      | 0.00        |
| TOTALS:                           |                  |                                        |        | 44           | 2,713,926                        |        | 2,007,402                           | 100.00                    | 801.69      | 44           | 2,713,926                        | 2,007,402                           | 100.00                    | 1,030.22    |

PRE-MERGER HHI: 802  
 POST-MERGER HHI: 1,030  
 HHI CHANGE: 229

**Footnotes:**

\* FRB Approach: Banks at 100%, Thrifts at 50%, Competitive Credit Unions at 50%, Other Credit Unions at 0%.

\*\* Pro Forma Ownership assumes that announced transactions have been completed.

\*\*\* Deposits per branch for credit unions are approximated by dividing each credit union's total deposits by its branch count based on the credit union's most recent call report or publicly available information.

**Public Exhibit 6**

**Fifth Third Bank Community Reinvestment Act Performance Evaluation,  
dated July 18, 2022**



## **PUBLIC DISCLOSURE**

July 18, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Fifth Third Bank, National Association  
Charter Number: 25190

38 Fountain Square Plaza  
Cincinnati, OH 45202

Office of the Comptroller of the Currency

Large Bank Supervision  
Constitution Center  
400 7th Street, S.W.  
Washington, DC 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.....                                          | 3   |
| Description of Institution .....                                 | 4   |
| Scope of the Evaluation .....                                    | 4   |
| Discriminatory or Other Illegal Credit Practices Review .....    | 9   |
| Multistate Metropolitan/Combined Statistical Area Ratings .....  | 10  |
| Charleston-Huntington-Ashland, WV-OH-KY (Charleston) CSA .....   | 10  |
| Chicago-Naperville, IL-IN-WI (Chicago) CSA .....                 | 18  |
| Cincinnati-Wilmington-Maysville, OH-KY-IN (Cincinnati) CSA ..... | 27  |
| Evansville, IN-KY (Evansville) MMSA .....                        | 36  |
| Louisville/Jefferson County, KY-IN (Louisville) MMSA .....       | 45  |
| South Bend-Elkhart-Mishawaka, IN-MI (South Bend) CSA .....       | 53  |
| State Ratings .....                                              | 61  |
| State of Florida.....                                            | 61  |
| State of Georgia .....                                           | 71  |
| State of Illinois.....                                           | 80  |
| State of Indiana .....                                           | 89  |
| State of Kentucky.....                                           | 99  |
| State of Michigan .....                                          | 109 |
| State of North Carolina .....                                    | 120 |
| State of Ohio .....                                              | 130 |
| State of South Carolina .....                                    | 140 |
| State of Tennessee.....                                          | 147 |
| Appendix A: Scope of Examination .....                           | A-1 |
| Appendix B: Summary of MMSA and State Ratings .....              | B-1 |
| Appendix C: Definitions and Common Abbreviations .....           | C-1 |
| Appendix D: Tables of Performance Data .....                     | D-1 |

## Overall CRA Rating

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

The following table indicates the performance level of Fifth Third Bank, National Association with respect to the Lending, Investment, and Service Tests:

| Performance Levels        | Fifth Third Bank, National Association<br>Performance Tests |                 |              |
|---------------------------|-------------------------------------------------------------|-----------------|--------------|
|                           | Lending Test*                                               | Investment Test | Service Test |
| Outstanding               | X                                                           | X               | X            |
| High Satisfactory         |                                                             |                 |              |
| Low Satisfactory          |                                                             |                 |              |
| 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 13 of the 16 rating areas, good performance in two rating areas, and adequate performance in one rating area.
- The Investment Test rating is based on excellent performance in 12 of the 16 rating areas, good performance in one rating area, adequate performance in two rating areas, and poor performance in one rating area.
- The Service Test rating is based on excellent performance in 10 of the 16 rating areas, good performance in five rating areas, and adequate performance in one rating area.

## Lending in Assessment Area

A high percentage of the bank's loans were in its assessment areas (AAs).

The bank originated and purchased 81 percent of its total loans inside its 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. This factored favorably into the geographic distribution of lending by income level of the geography.

| Lending Inside and Outside of the Assessment Area |                 |      |         |      |         |                                 |      |            |      |                |
|---------------------------------------------------|-----------------|------|---------|------|---------|---------------------------------|------|------------|------|----------------|
| Loan Category                                     | Number of Loans |      |         |      | Total # | Dollar Amount of Loans \$(000s) |      |            |      | Total \$(000s) |
|                                                   | Inside          |      | Outside |      |         | Inside                          |      | Outside    |      |                |
|                                                   | #               | %    | #       | %    |         | \$                              | %    | \$         | %    |                |
| Home Mortgage                                     | 266,531         | 76.3 | 82,914  | 23.7 | 349,445 | 46,150,789                      | 64.1 | 25,894,467 | 35.9 | 72,045,255     |
| Small Business                                    | 115,493         | 94.6 | 6,561   | 5.4  | 122,054 | 12,339,337                      | 89.7 | 1,418,054  | 10.3 | 13,757,391     |
| Small Farm                                        | 980             | 91.1 | 96      | 8.9  | 1,076   | 53,681                          | 88.5 | 6,975      | 11.5 | 60,656         |
| Total                                             | 383,004         | 81.0 | 89,571  | 19.0 | 472,575 | 58,543,807                      | 68.2 | 27,319,496 | 31.8 | 85,863,302     |



## Description of Institution

Fifth Third Bank, National Association (FTB, bank, or institution) is an interstate bank headquartered in Cincinnati, Ohio and owned by Fifth Third Bancorp. Fifth Third Bancorp is a diversified financial services company, also headquartered in Cincinnati. As of December 31, 2021, FTB had \$209.7 billion in assets, ranking it as the 13<sup>th</sup> largest U.S. commercial bank, with \$176.3 billion in deposits and \$16.7 billion in tier 1 capital.

As of December 31, 2021, FTB had a network of 1,117 branch office locations and 2,320 automated teller machines (1,649 deposit-taking ATMs) in 11 states that included Florida, Georgia, Illinois, Indiana, Kentucky, Michigan, North Carolina, Ohio, South Carolina, Tennessee, and West Virginia.

Fifth Third Community Development Company, LLC (FTCDC) is a holding company nonbank subsidiary organized primarily for making investments in small business investment companies (SBIC), other qualifying business ventures, and affordable housing tax credit investments. FTCDC is a primary contributor to FTB's investment test under CRA.

Fifth Third Foundation is part of the Foundation Office within FTB. Established in 1948, Fifth Third Foundation was one of the first charitable foundations created by a financial institution. It supports worthy causes in the areas of health and human services, education, community development, and the arts in the states where FTB operates.

On March 22, 2019, FTB completed an acquisition of MB Financial, Inc., a Chicago-based holding company for MB Financial Bank, National Association (MB Financial Bank), which had approximately \$20 billion in assets. MB Financial Bank was regulated by the OCC and received an "Outstanding" rating on its last CRA evaluation dated January 17, 2017.

Fifth Third Bank converted from an Ohio state-chartered bank to a national bank on November 14, 2019. Its prior CRA evaluation was conducted by the Federal Reserve Bank of Cleveland as of November 28, 2016, and the bank was rated "Outstanding."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated home mortgage loans, small loans to businesses and farms, community development (CD) loans, qualified investments, and retail and CD services from January 1, 2017, to December 31, 2021, except for the state of South Carolina, which was evaluated from January 1, 2021, to December 31, 2021. FTB did not branch into South Carolina until September 2020. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration. Qualifying activities performed in response to the significant impact of the coronavirus pandemic (COVID-19) across the United States were also considered in this evaluation.

Generally, the OCC considers CRA evaluation periods to begin on the conversion date to a national bank charter. However, to ensure that the OCC considered all CRA activities, examiners used a CRA evaluation period start date that went back to the end date of the previous CRA evaluation period, without regard to the charter conversion date.

### Lending Test

The OCC evaluated home mortgage and small loans to businesses in each AA. In most markets, FTB made few, if any, small loans to farms as farm lending is not a primary product for the bank. Some of the bank's AAs that contain more rural geographies had sufficient small loans to farms to analyze. The OCC determined that 20 loans originated within an AA was sufficient for analysis purposes. Due to the limited number of farms in low- and moderate-income geographies, small farm lending had no material impact on the Lending Test conclusions. If examiners included an analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area. Tables related to small loans to farms where the bank had no lending (state of South Carolina) were removed from appendix D.

The OCC determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans, the OCC gave greater weight to FTB's performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units or businesses in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level of the AA as well as the significant affordability barriers that exist in many of FTB's markets. The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community.

### Investment Test

The OCC gave equal consideration to the volume of investments and grants made during the current evaluation period and those made in prior evaluation periods that remained outstanding. The OCC also considered how responsive the investments were to the needs of the communities. In most AAs, the investments were considered non-complex. FTB used low-income housing tax credits (LIHTC) in many AAs.

### Service Test

The OCC gave primary consideration to FTB's performance in delivering retail products and services to geographies and individuals of different income levels through FTB's distribution of branches. The OCC focused on branches in low- and moderate-income geographies. The OCC evaluated the range of products and services offered by FTB through its branch network with emphasis on accessibility to low- and moderate-income borrowers. Products and services offered are consistent throughout the branch network. The OCC specifically focused on any differences in branch hours and services in low- and moderate-income geographies compared to those in middle- and upper- income geographies. FTB offers a wide range of traditional deposit and banking products and services. While the bank offers multiple alternative delivery systems commensurate with standard industry offerings including ATMs, telephone and online banking, electronic bill-pay, remote deposit capture, and mobile banking options, examiners did not consider these systems as there was insufficient data to determine their effectiveness in targeting low- and moderate-income individuals or geographies. The OCC evaluated the level of retail services provided to low- and moderate-income borrowers through bank-provided analysis. Examiners evaluated FTB's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to the needs of the community. The OCC gave the most consideration to CD services that addressed critical needs or were most impactful to the AA.

In the full-scope AAs, examiners considered branches located in middle- and upper income geographies that served and improved access for low- and moderate-income customers or customers in low- and moderate-income geographies in one of two ways. Examiners gave positive consideration when a middle- and upper income branch was “across the street” (less than 1,000 feet) from a low- or moderate-income geography. Examiners also considered middle- and upper income branches that, based on documentation provided by the bank, showed that the branch served low- and moderate-income customers. Positive consideration was given if the percentage of low- and moderate-income customers (based on modeled customer income) that used a branch located in a middle- or upper-income geography exceeded 75 percent of the branch’s customer base. Consideration was given to each middle- and upper income branch only once.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 and multistate ratings.

The Cincinnati CSA, Chicago CSA, and the states of Michigan and Ohio received the greatest weight in arriving at the overall rating. Combined, these areas accounted for nearly 72 percent of the bank’s total deposits and 64 percent of lending during the evaluation period. Home mortgage lending received substantially greater weight than small loans to businesses due to home mortgage lending being a higher percentage of total lending volume. Small loans to farms accounted for less than one-half of one percent of total lending and had minimal effect on the overall rating.

The MMSA/CSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA/CSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

### **Other Information**

AA – The OCC determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that FTB’s branches service and did not arbitrarily exclude any low- and moderate-income areas.

Deposit Market Share – The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2021. This was the most recent public data available during the evaluation period.

Lending Market/Peer Data – Due to timing and release of data, the OCC used 2021 peer mortgage data and 2020 peer small loans to businesses and farms data reported to the Federal Financial Institutions Examination Council.

Unemployment rate – The unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics. In a CSA, the rate is for the MSA comprising most of the CSA.

Financial Empowerment Mobile/E-bus – The bank, after its conversion to a national bank, continued its unique partnership with The Community College Foundation to sponsor the Financial Empowerment Mobile, also known as the E-Bus. The E-Bus is a 40-foot, retrofitted vehicle staffed by FTB employees and equipped with onboard computer workstations and internet connectivity. The E-Bus travels throughout the bank's markets to reach neighborhoods in low- and moderate-income geographies that have been traditionally underserved by banks and is occasionally used for marketing events, such as a new banking center location, or community events. During the COVID-19 pandemic, the bank conducted virtual E-Bus events.

Flexible and Innovative Lending Products – The bank's innovative and flexible loan product offerings include both bank-developed and government-sponsored loan programs that help to meet the credit needs of low- and moderate-income borrowers. Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing. A summary of FTB's innovative and/or flexible loan products or programs offered are as follows:

53 Community Mortgage – Offers low- and moderate-income borrowers the ability to make high loan-to-value (LTV) purchase and refinance transactions. The program offers reduced lender fees and can be combined with FTB's Down Payment Assistance (DPA) product if the subject property is in a low- and moderate-income geography.

Federal Housing Administration (FHA) – Allows for high LTV purchase and refinance transactions. The program allows for low down payment options, flexible sources for down payment, low minimum credit score and is aimed at borrowers who may not qualify for traditional financing. There are no area median income (AMI) or property location requirements.

Freddie Mac Home Possible (Freddie Mac HP) – Allows high LTV purchase and refinance transactions for borrowers whose qualifying income is at or below 80 percent of the AMI.

Freddie Mac Refi Possible (Freddie Mac RP) – Refinance option for low-income borrowers with loans currently backed by Freddie Mac. May allow borrowers, who previously could not or did not refinance, the opportunity to refinance with lower closing costs and better pricing.

Fannie Mae Home Ready (Fannie Mae HR) – Product that allows high LTV purchase and refinance transactions for borrowers at or below 80 percent of the AMI.

Fannie Mae Home Refi Now (Fannie Mae RN) – Refinance option for low-income borrowers with loans currently backed by Fannie Mae. May allow borrowers, who previously could not or did not refinance, the opportunity to refinance with lower closing costs and better pricing.

United States Department of Agriculture/Rural Housing Services (USDA/RHS) – No down payment purchase and 100 percent refinance transactions, in rural areas, for borrowers with household income below the AMI. The program requires an upfront guarantee fee that can be financed and monthly mortgage insurance.

Veterans Administration (VA) – Federal mortgage loan programs to help veterans and their families obtain home financing.

Illinois Housing Development Authority (IHDA) – Group of products (conventional, FHA, VA, USDA/RHS, et al.) permitting high LTV purchase transactions on properties at or below IHDA sales price limits and for income at or below IHDA requirements. IHDA also offers borrowers down payment and closing cost assistance.

Kentucky Housing Corporation (KHC) – Group of products (conventional, FHA, VA, USDA/RHS, et al.) permitting high LTV purchase transactions on properties at or below KHC sales price limits and for applicant income at or below KHC requirements. KHC also offers borrowers down payment and closing cost assistance.

Michigan State Housing Development Authority (MSHDA) – Group of products (FHA, VA, USDA/RHS, and MSHDA DPA) permitting high LTV purchase transactions on properties at or below MSHDA sales price limits and for borrowers with household income at or below MSHDA requirements. MSHDA also offers borrowers down payment and closing cost assistance.

Young Bankers Club (YBC) – Proprietary program targeted to elementary schools located in low- and moderate-income geographies to educate students on the importance of financial responsibility over a five- to ten-week curriculum in money management and economics. The program meets local and state educational standards for both mathematics and social studies.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) in determining a national 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 (HUD), and the Consumer Financial Protection Bureau, as applicable.

In April 2018, the OCC conducted a fair lending examination of MB Financial Bank and identified a violation of the Fair Housing Act (FHA). In May 2018, FTB announced its intent to acquire MB Financial Bank and closed on the transaction in March 2019. The FHA violation was attributed to practices that existed at MB Financial Bank prior to the acquisition by FTB. The violation was cited at FTB as the successor of MB Financial Bank. The institution fully remediated all borrowers identified as harmed by the practices at MB Financial Bank.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution took corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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.

## Multistate Metropolitan/Combined Statistical Area Ratings

### Charleston-Huntington-Ashland, WV-OH-KY (Charleston) CSA

**CRA rating for the Charleston CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

### Description of Institution's Operations in the Charleston CSA

FTB delineated a portion of the Charleston CSA as its AA. Refer to the table in appendix A for a list of counties reviewed.

The Charleston CSA was FTB's 14th largest rating area based on total deposits. The bank had approximately \$602 million in deposits, representing 0.4 percent of the bank's total deposits. The area is served by 25 FDIC-insured banks operating 141 branches. FTB ranked seventh with 4.5 percent deposit market share. The top three banks and their deposit market share include Truist Bank (21.5 percent), United Bank (12.8 percent), and City National Bank of West Virginia (12.2 percent). FTB operated eight branches and 13 ATMs. During the evaluation period, the bank made \$313.9 million, or 0.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Charleston CSA

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

---

<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.



**Table A – Demographic Information of the Assessment Area****Assessment Area: Charleston CSA**

| <b>Demographic Characteristics</b>                                   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
|----------------------------------------------------------------------|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                          | 136      | 6.6                   | 24.3                         | 43.4                     | 25.0                    | 0.7                   |
| Population by Geography                                              | 512,634  | 4.2                   | 17.0                         | 49.9                     | 28.3                    | 0.5                   |
| Housing Units by Geography                                           | 237,567  | 5.1                   | 17.6                         | 49.4                     | 27.6                    | 0.2                   |
| Owner-Occupied Units by Geography                                    | 146,351  | 2.2                   | 14.3                         | 52.2                     | 31.2                    | 0.0                   |
| Occupied Rental Units by Geography                                   | 63,353   | 10.2                  | 23.1                         | 43.4                     | 22.6                    | 0.8                   |
| Vacant Units by Geography                                            | 27,863   | 8.7                   | 22.8                         | 48.3                     | 20.0                    | 0.3                   |
| Businesses by Geography                                              | 35,544   | 8.3                   | 14.9                         | 46.3                     | 30.2                    | 0.3                   |
| Farms by Geography                                                   | 864      | 3.9                   | 13.0                         | 52.0                     | 31.1                    | 0.0                   |
| Family Distribution by Income Level                                  | 132,657  | 22.5                  | 16.6                         | 19.5                     | 41.4                    | 0.0                   |
| Household Distribution by Income Level                               | 209,704  | 26.6                  | 15.2                         | 16.7                     | 41.5                    | 0.0                   |
| Median Family Income MSA - 16620<br>Charleston, WV MSA               |          | \$54,658              | Median Housing Value         |                          |                         | \$109,564             |
| Median Family Income MSA - 26580<br>Huntington-Ashland, WV-KY-OH MSA |          | \$54,584              | Median Gross Rent            |                          |                         | \$645                 |
| Median Family Income Non-MSAs - OH                                   |          | \$55,785              | Families Below Poverty Level |                          |                         | 13.6%                 |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$27,893 and moderate-income families earned less than \$44,622. The median housing value in the AA is \$109,564. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$697 for a low-income borrower and \$1,116 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$558. Some low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 13.6 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, the economy is growing, but underperforming both the region and nation. The lack of viable growth drivers is expected to deepen out-migration in future years. The pace of economic recovery is expected to be slower than the national average. Some of the area's strengths are low cost of living,

location and transportation linkages, and below average employment volatility. Exposures to a declining coal industry and a declining population are challenges. Despite economic challenges, housing prices and permits are increasing. Education and health services, government, retail trade, and professional and business services are important economic drivers. The largest employers are King's Daughters Medical Center, Cabell Huntington Hospital, St. Mary's Medical Center, Marshall University, and Marathon Petroleum.

The unemployment rate for the CSA was 6.9 percent as of January 2017. Unemployment levels significantly increased from 5.9 percent in March 2020 to 16.7 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the CSA was 3.3 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC reviewed information from three community contacts made during the evaluation period within the CSA to better understand area credit and community needs. Contacts worked for organizations associated with small business development, affordable housing, and the creation and retention of jobs. Contacts expressed the historic importance of the energy industry in the CSA. The area has shifted away from coal mining, but high demand remains for metallurgical products. The abundance of shale and natural gas in the area has propelled manufacturing. The relatively low cost of living paired with under-utilized commercial real estate makes this area an attractive location for investment. The CSA has attracted, with some level of success, businesses in automotive supplies, air/space components, and airplane maintenance and repair. Contacts indicated the needs in the CSA are:

- Financing to small businesses, including start-ups.
- Loans for the rehabilitation of older housing stock.
- Financing for derivative companies including the ethane and butane space.
- Multifamily housing in more rural areas of the CSA.

## **Scope of Evaluation in Charleston CSA**

This area received a full-scope review. For purposes of this evaluation, examiners combined the bank's delineated AAs into one and aggregated the data at the CSA level for purposes of analysis and presentation. FTB did not originate or purchase enough small loans to farms in the Charleston CSA to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLESTON CSA**

### **LENDING TEST**

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

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

#### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit.

| <b>Number of Loans</b> |               |                |            |                       |       |
|------------------------|---------------|----------------|------------|-----------------------|-------|
| Assessment Area        | Home Mortgage | Small Business | Small Farm | Community Development | Total |
| Charleston CSA         | 2,038         | 582            | 3          | 9                     | 2,632 |

| <b>Dollar Volume of Loans (\$000s)</b> |               |                |            |                       |         |
|----------------------------------------|---------------|----------------|------------|-----------------------|---------|
| Assessment Area                        | Home Mortgage | Small Business | Small Farm | Community Development | Total   |
| Charleston CSA                         | 249,188       | 64,605         | 96         | 9,937                 | 323,826 |

FTB had a deposit market share of 4.5 percent and ranked seventh among 25 FDIC-insured banks, which placed it in the top 28 percent of banks.

The bank had a market share of 4 percent based on the number of home mortgage loans originated or purchased and ranked fourth among 315 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 19.6 percent were Rocket Mortgage (8.7 percent), City National Bank of West Virginia (6.6 percent), and Prime Lending (4.3 percent).

The bank had a market share of 2.9 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 113 small business lenders, which placed it in the top 11 percent of lenders. The top three lenders with a combined market share of 26.9 percent were Truist Financial (9.8 percent), American Express National Bank (9.1 percent), and WesBanco Bank (8 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

Refer to Table O in the Charleston CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies and was below the aggregate distribution of all lenders. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the Charleston CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in low-income geographies but was below the aggregate distribution of all lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Charleston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

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 all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the Charleston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 14.1 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth 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 nine CD loans totaling nearly \$9.9 million, which represented 16.6 percent of allocated tier 1 capital. CD loans were primarily made for community services purposes. By dollar volume, 8.4 percent of these loans funded affordable housing, 19 percent funded economic development, 26.3 percent funded revitalization and stabilization efforts, and 46.3 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$1.5 million Paycheck Protection Program (PPP) loan that assisted a medical facility located in a low-income geography in Portsmouth, OH to continue offering services during the pandemic.
- \$600,000 loan (and renewed during the evaluation period) to a multi-service nonprofit organization headquartered in Huntington, WV. The organization provides job and skills training services to low- and moderate-income persons within Kentucky, Ohio, and West Virginia, including the bank's AA.

### Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 238 loans under flexible lending programs specific to the AA totaling \$26.3 million. Program volumes included three 53 Community Mortgage loans totaling \$200,000, 114 FHA loans totaling \$12.2 million, 17 Freddie Mac HP loans totaling \$1.6 million, 33 Fannie Mae HR loans totaling \$2.7 million, 24 USDA/RHS loans totaling \$2.8 million, and 47 VA loans totaling \$6.9 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the Charleston CSA is rated Outstanding.

Based on a full-scope review, the FTB's performance in the Charleston CSA was excellent.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |          |                |          |       |              |          |               |                        |          |
|-----------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Charleston CSA        | 17            | 2,768    | 96             | 4,424    | 113   | 100          | 7,192    | 100           | 8                      | 119      |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 96 investments totaling \$4.4 million during the evaluation period to approximately 45 organizations/projects. The dollar volume of current and prior period investments represented 12 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 90.7 percent of investments supported affordable housing, 8.4 percent funded community services to low- and moderate-income individuals, and 0.9 percent supported economic development. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$736,000 investment to construct a 36-unit complex for low-income seniors in St. Albans, WV.
- \$630,000 investment to construct a 45-unit apartment complex in Portsmouth, OH to serve transition age youth. The local housing authority partnered with a family health center to coordinate necessary services, including teaching skills necessary for independent living. All units are income restricted to individuals with income from 30 to 60 percent of the AMI.
- \$250,000 investment in a LIHTC project that will renovate a 32-unit apartment complex in Huntington, WV. Households must earn less than 60 percent of the AMI. The project also participates in Section 521 USDA rental assistance for very low and low- and moderate-income families.

## SERVICE TEST

The institution's performance under the Service Test in the Charleston CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Charleston CSA was excellent.

## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Charleston CSA                         | 100.0                          | 8                  | 100.0                          | 12.5                                              | 25.0 | 50.0 | 12.5 | 0.0 | 4.2                                   | 17.0 | 49.9 | 28.3 | 0.5 |

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 13 ATMs in the AA, of which 11 were deposit-taking.

| Distribution of Branch Openings/Closings |
|------------------------------------------|
| Branch Openings/Closings                 |

| Assessment Area | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|-----------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
|                 |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| Charleston CSA  | 0                    | 4                    | 0                                              | 0   | -3  | -1  | 0  |

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. The bank closed four branches, all in middle- or upper income geographies. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to those in middle- and upper income geographies.

### Community Development Services

The institution was a leader in providing CD services.

Over 50 bank employees provided 76 qualified CD service activities to approximately 30 organizations logging 2,377 qualified hours. Leadership is evident through board or committee participation in 35 of these activities with 12 employees providing 706 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and economic development needs.

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

- An employee served on the board of a capital fund that invests in eligible small businesses in West Virginia. The employee provided 216 hours of service.
- An employee served on the board of a children's advocacy organization serving low- and moderate-income families located in West Virginia. The employee provided 48 hours of service.
- Bank staff provided 25 financial education programs, which included 14 YBC sessions for over 350 students.

## Chicago-Naperville, IL-IN-WI (Chicago) CSA

**CRA rating for the Chicago CSA<sup>2</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and overall distribution of loans by borrower income and businesses of different sizes was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes.

## Description of Institution's Operations in Chicago CSA

FTB delineated a portion of the Chicago CSA as its AA. The area included a portion of the Chicago-Naperville-Elgin, IL-IN-WI MSA, and the entire Michigan City-LaPorte, IN MSA. Refer to appendix A for a list of counties reviewed.

The Chicago CSA was FTB's second largest rating area based on total deposits. The bank had approximately \$29.2 billion in deposits, representing 17.3 percent of its total deposits. The area was served by 161 FDIC-insured banks operating 2,361 branches. FTB ranked sixth with 5.2 percent deposit market share. The top three banks and their deposit market share include JPMorgan Chase Bank, N.A. (23.1 percent), BMO Harris Bank N.A. (15.1 percent), and Bank of America, N.A. (8.5 percent). FTB operated 170 branches and 268 ATMs. During the evaluation period, the bank made \$10.8 billion, or 18.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Chicago CSA

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

---

<sup>2</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.



| Table A – Demographic Information of the Assessment Area                                                                                                                                 |           |               |                              |                  |                 |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Chicago CSA                                                                                                                                                             |           |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                              | #         | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                              | 2,194     | 14.0          | 23.6                         | 29.4             | 32.0            | 1.0           |
| Population by Geography                                                                                                                                                                  | 9,413,216 | 9.8           | 23.2                         | 32.0             | 34.8            | 0.3           |
| Housing Units by Geography                                                                                                                                                               | 3,754,759 | 10.2          | 22.2                         | 32.0             | 35.3            | 0.3           |
| Owner-Occupied Units by Geography                                                                                                                                                        | 2,200,480 | 4.4           | 17.4                         | 35.4             | 42.7            | 0.1           |
| Occupied Rental Units by Geography                                                                                                                                                       | 1,204,800 | 17.3          | 29.4                         | 27.5             | 25.1            | 0.6           |
| Vacant Units by Geography                                                                                                                                                                | 349,479   | 22.2          | 27.8                         | 25.5             | 24.1            | 0.4           |
| Businesses by Geography                                                                                                                                                                  | 830,261   | 6.1           | 16.7                         | 29.4             | 47.4            | 0.4           |
| Farms by Geography                                                                                                                                                                       | 13,898    | 3.5           | 14.7                         | 40.0             | 41.7            | 0.1           |
| Family Distribution by Income Level                                                                                                                                                      | 2,243,386 | 23.3          | 16.3                         | 18.7             | 41.7            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                   | 3,405,280 | 25.2          | 15.3                         | 17.1             | 42.5            | 0.0           |
| Median Family Income MSA - 16984<br>Chicago-Naperville-Evanston, IL                                                                                                                      |           | \$75,024      | Median Housing Value         |                  |                 | \$236,800     |
| Median Family Income MSA - 20994<br>Elgin, IL                                                                                                                                            |           | \$80,899      | Median Gross Rent            |                  |                 | \$1,035       |
| Median Family Income MSA - 23844<br>Gary, IN                                                                                                                                             |           | \$64,075      | Families Below Poverty Level |                  |                 | 10.6%         |
| Median Family Income MSA - 29404<br>Lake County-Kenosha County, IL-WI                                                                                                                    |           | \$87,137      |                              |                  |                 |               |
| Median Family Income MSA - 33140<br>Michigan City-La Porte, IN MSA                                                                                                                       |           | \$58,424      |                              |                  |                 |               |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(*) The NA category consists of geographies that have not been assigned an income classification. |           |               |                              |                  |                 |               |

Based on information in the above table, low-income families earned between \$32,038 and \$43,569 and moderate-income families earned between \$51,260 and \$69,710, depending on the metropolitan division (MD) and MSA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$801 and \$1,089 for low-income borrowers and between \$1,282 and \$1,773 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,275. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

## Economic Data

Information from Moody's Analytics indicated the Chicago CSA AA had a well-diversified economy. Key sectors of the economy based on percentage of total employment included Professional and Business Services, Education and Health Services, Government, and Leisure and Hospitality Services. Major employers in the AA included Advocate Health Care System, the University of Chicago, Abbott Laboratories, JPMorgan Chase & Co., Northwestern Memorial Healthcare, and Amazon.

The unemployment rate in the Chicago CSA was 4.7 percent in December 2017 rising to 17.5 percent in March 2020 and was 4.3 percent in December 2021.

The region continued to be impacted by state and local budgetary pressures, along with above average crime rates, which had an impact on population growth. The area experienced an outflow of population over the evaluation period, which worsened more than expected. This also impacted job growth. Illinois continues to experience a high level of foreclosures, with the third highest level among the 50 states. Two of the top five counties for foreclosures in Illinois were in the Chicago CSA. In addition, although home values had rebounded in recent years overall, many areas continued to reflect home values struggling to bounce back, specifically homes located in low- and moderate-income geographies. A study by a local university showed the home values in geographic areas south of downtown Chicago, which had a higher percentage of properties in low- and moderate-income geographies, were struggling the most. As a result, refinance and home equity loan opportunities were still limited for these areas where property values are still “underwater.”

## **Community Contacts**

Information from 11 community contact interviews; five from economic development entities, three from affordable housing organizations, and three from local government agencies, identified the following needs within the Chicago CSA:

- Financing for one-to-four family home purchases and rehabilitation, multifamily buildings with tenants using Section 8 housing vouchers, and small businesses.
- Credit builder programs and emergency savings accounts.
- Investments in Community Development Financial Institutions (CDFI) loan pools that originate loans for affordable housing or micro loans to small businesses.
- Service on CDFI boards or committees.
- Down payment and closing cost assistance programs for low- and moderate-income borrowers.
- Financial counseling and education programs including first-time homebuyer programs.
- Foreclosure prevention programs designed to keep homeowners in their homes.
- Youth employment, job training, and workforce housing programs.

The Chicago CSA yielded abundant opportunities to serve the identified needs. There were numerous CD and social services organizations in the AA. Local governments had designated many areas for redevelopment and use a variety of resources to increase investments in those areas including tax increment financing districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs.

## **Scope of Evaluation in Chicago CSA**

The Chicago CSA received a full-scope review. The bank-delineated AAs were combined, analyzed, and presented at the CSA level. This area received substantial weight in the overall bank rating as it accounted for 17.3 percent of total deposits and 15.4 percent of HMDA and small loans to business and farm lending during the evaluation period.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO CSA

### LENDING TEST

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

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

#### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans |               |                |            |                       |        |
|-----------------|---------------|----------------|------------|-----------------------|--------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total  |
| Chicago CSA     | 33,383        | 25,496         | 67         | 532                   | 59,478 |

| Dollar Volume of Loans (\$000s) |               |                |            |                       |            |
|---------------------------------|---------------|----------------|------------|-----------------------|------------|
| Assessment Area                 | Home Mortgage | Small Business | Small Farm | Community Development | Total      |
| Chicago CSA                     | 7,824,369     | 3,001,170      | 3,857      | 1,905,002             | 12,734,398 |

FTB had deposit market share of 5.2 percent and ranked sixth among 161 FDIC-insured banks, which placed it in the top 4 percent of banks.

The bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased and ranked ninth among 987 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders with a combined market share of 19.5 percent were JPMorgan Chase Bank, N.A. (8.3 percent), Guaranteed Rate, Inc. (6.6 percent), and Rocket Mortgage (4.6 percent).

The bank had a market share of 4 percent based on the number of small loans to businesses originated or purchased and ranked eighth out of 350 small business lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 35.9 percent were JPMorgan Chase Bank, N.A. (18.4 percent), American Express National Bank (11.2 percent), and Cross River Bank (6.4 percent).

The bank had a market share of 0.6 percent based on the number of small loans to farms originated or purchased and ranked 21<sup>st</sup> out of 55 small farm lenders, which placed it in the top 39 percent of lenders. The top three lenders with a combined market share of 36.9 percent were John Deer Financial F.S.B. (14.7 percent), JPMorgan Chase Bank, N.A. (13.2 percent), and Heartland Bank & Trust Company (9 percent).

#### Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the Chicago CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the Chicago CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the Chicago CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Chicago CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the Chicago CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.6 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the Chicago CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 14.9 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 below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth 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 532 CD loans totaling nearly \$1.9 billion, which represented 65.8 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 56.3 percent funded economic development, 20.8 percent funded revitalization and stabilization efforts, 17.2 percent funded community services targeted to low- and moderate-income individuals, and 5.7 percent funded affordable housing.

Examples of CD loans include:

- \$36.9 million loan to a city in the AA, where a majority of the residents earn less than 80 percent of the AMI. The funding allowed the city to provide essential public services.
- \$14.5 million loan to an entity developing a transit oriented mixed-use development that will include 99 residential units, with 50 allocated to low- and moderate-income residents, in the Bronzeville neighborhood of Chicago.
- \$11 million revolving line to an organization providing affordable housing, workforce development, and financial stability to low-income persons at 75 sites in Chicago. Over 90 percent of the organization's clients are unemployed and living below the poverty level.

## Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 1,240 loans under flexible lending programs specific to the AA totaling \$220.1 million. Program volumes included 30 IHDA loans totaling \$2.4 million, three 53 Community Mortgage loans totaling \$390,000, 595 FHA loans totaling \$112.9 million, 365 Freddie Mac HP loans totaling \$53.9 million, one Freddie Mac RP loan totaling \$253,000, 92 Fannie Mae HR loans totaling \$13.9 million, one Fannie Mae RN loans totaling \$190,000, six USDA/RA loans totaling \$782,000, and 147 VA loans totaling \$35.3 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the Chicago CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Chicago CSA was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |          |                |          |       |              |          |               |                        |          |
|-----------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Chicago CSA           | 67            | 63,437   | 901            | 274,577  | 968   | 100          | 338,014  | 100           | 46                     | 4,628    |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 901 investments during the evaluation period totaling \$274.6 million to approximately 80 organizations/projects. The dollar volume of current and prior period investments represented 11.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 81.8 percent of investments supported affordable housing, 13.7 percent supported economic development, 4 percent funded community services to low- and moderate-income individuals, and 0.5 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$37.5 million to a CDFI that provides financing for the acquisition, rehabilitation, and preservation of affordable rental housing in Chicago neighborhoods and suburban communities.
- \$20 million to the largest CDFI in the Midwest. The CDFI provides loans and real estate consulting to nonprofits, with a particular focus on those that serve low-income communities.
- \$19.5 million LIHTC for a transit oriented mixed-use complex that will contain 99 residential units in a Chicago neighborhood. Fifty units are restricted to renters earning up to 60 percent of AMI.
- \$11 million LIHTC for redevelopment of two vacant warehouses that will create 120 units of affordable housing in Chicago's McKinley Park neighborhood.

## SERVICE TEST

The institution's performance under the Service Test in the Chicago CSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Chicago CSA was good.

## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Chicago CSA                            | 100.0                          | 170                | 100.0                          | 5.9                                               | 15.3 | 37.1 | 41.8 | 0.0 | 9.8                                   | 23.2 | 32.0 | 34.8 | 0.3 |

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners gave positive consideration for 17 branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography and two middle- and upper income

branches where the percentage of usage by low- and moderate-income households equaled or exceeded the percentage of low- and moderate-income populations in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 268 ATMs in the AA, of which 241 were deposit-taking.

| Distribution of Branch Openings/Closings |                      |                      |                                                |     |     |     |    |
|------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
| Branch Openings/Closings                 |                      |                      |                                                |     |     |     |    |
| Assessment Area                          | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|                                          |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| Chicago CSA                              | 6                    | 81                   | -3                                             | -3  | -35 | -33 | -1 |

To the extent changes have been made, the institution's opening and closing of branches generally has not adversely affected its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened six branches, one in a moderate-income geography. The bank closed 81 branches, three in low-income geographies and four in moderate-income geographies. Most of these branch closures were consolidations with another nearby branch due to duplicative locations after the acquisition of MB Financial Bank.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 1,082 qualified CD service activities to over 150 organizations logging 20,789 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 432 of these activities with 157 employees providing 10,694 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and economic development needs.

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

- Sixteen bank employees served on a qualified CD organization's fundraising committee providing a total of 254 hours of service in one year of the evaluation period.
- An employee served on the board of directors of an organization that assists Hispanic and Latino small businesses obtain financing. The employee provided 190 hours of service in one year of the evaluation period.
- Bank staff provided nearly 350 financial education programs, which included 78 YBC sessions to over 1,800 students.



## Cincinnati-Wilmington-Maysville, OH-KY-IN (Cincinnati) CSA

**CRA rating for the Cincinnati CSA<sup>3</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good, and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Cincinnati CSA

FTB delineated a portion of the Cincinnati CSA as its AA. It included a portion of the Cincinnati OH-KY-IN MSA and a Non-MSA county in Ohio. Refer to appendix A for a list of the counties reviewed.

The Cincinnati CSA AA was FTB's largest rating area based on total deposits. The bank had approximately \$45.5 billion in deposits, representing nearly 27 percent of the bank's total deposits. The area was served by 58 FDIC-insured banks operating 657 branches. FTB ranked second with 28.7 percent deposit market share. The top three banks, excluding FTB, and their deposit market share include U.S. Bank, N.A. (46.4 percent), PNC Bank N.A. (5.8 percent), and The Huntington National Bank (3.1 percent). FTB operated 116 branches and 309 deposit-taking ATMs. During the evaluation period, the bank made \$6.2 billion, or 10.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

## Cincinnati CSA

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

---

<sup>3</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Cincinnati CSA**

| <b>Demographic Characteristics</b>                           | <b>#</b>  | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
|--------------------------------------------------------------|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                  | 498       | 12.7                  | 22.7                         | 37.8                     | 25.1                    | 1.8                   |
| Population by Geography                                      | 2,151,034 | 8.0                   | 19.7                         | 40.2                     | 30.9                    | 1.2                   |
| Housing Units by Geography                                   | 921,243   | 9.8                   | 21.2                         | 40.4                     | 28.1                    | 0.5                   |
| Owner-Occupied Units by Geography                            | 548,041   | 3.8                   | 16.4                         | 43.6                     | 36.0                    | 0.1                   |
| Occupied Rental Units by Geography                           | 278,959   | 17.8                  | 28.6                         | 35.9                     | 16.7                    | 1.1                   |
| Vacant Units by Geography                                    | 94,243    | 21.6                  | 26.6                         | 34.9                     | 15.7                    | 1.2                   |
| Businesses by Geography                                      | 155,562   | 6.5                   | 19.5                         | 36.8                     | 36.1                    | 1.0                   |
| Farms by Geography                                           | 4,893     | 3.2                   | 16.3                         | 49.6                     | 30.9                    | 0.1                   |
| Family Distribution by Income Level                          | 542,546   | 22.1                  | 16.8                         | 20.0                     | 41.2                    | 0.0                   |
| Household Distribution by Income Level                       | 827,000   | 25.1                  | 15.5                         | 17.2                     | 42.3                    | 0.0                   |
| Median Family Income MSA - 17140<br>Cincinnati, OH-KY-IN MSA |           | \$69,949              | Median Housing Value         |                          |                         | \$156,211             |
| Median Family Income Non-MSAs - OH                           |           | \$55,785              | Median Gross Rent            |                          |                         | \$764                 |
|                                                              |           |                       | Families Below Poverty Level |                          |                         | 10.4%                 |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$34,975 and moderate-income families earned less than \$55,959. The median housing value in the AA is \$156,211. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$874 for a low-income borrower and \$1,399 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$852. Some low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.4 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, Cincinnati has a highly educated and skilled workforce, low living costs, and affordable housing. The economy is being driven by gains in professional and business services and leisure and hospitality. The factory sector has been hard hit by supply chain disruptions. Auto manufacturers have struggled with shortages of semiconductors fabricated in East Asia. According to the County Health Rankings, Hamilton County, Cincinnati's most populous county, ranks in the bottom half of U.S. counties for health quality.

Healthcare is a growing industry, and Cincinnati Children's Hospital and Mercy Health are both expanding and adding workers. The housing market is strong, and prices are up by double digits, driven by high demand. Professional and business services, education and health services, government, and manufacturing are important economic drivers of the economy. The largest employers are Cincinnati Children's Hospital Medical Center, Kroger Co., Cincinnati/Northern Kentucky International Airport, TriHealth Inc., and UC Health.

The unemployment rate for the Cincinnati CSA was 5.2 percent as of January 2017. Unemployment levels significantly increased from 4.7 percent in March 2020 to 13.6 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Cincinnati CSA was 2.8 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC held a listening session, completed one community contact, and reviewed information from three additional contacts within the Cincinnati CSA to better understand area credit and community needs. Organizations included local government housing authorities, affordable housing agencies, community development corporations, and community service providers. Community group leaders in the listening sessions indicated needs for affordable housing and workforce development programs. Participants also expressed the need for CD services including financial coaching, financial education/literacy, and face-to-face outreach. Outreach was cited especially as the COVID-19 pandemic subsides. Specifically, community group leaders cited the following needs:

- Preservation of affordable rental and homeownership units.
- Focused policy actions to create more affordable rental properties.
- Affordable housing units created by using investment vehicles outside of LIHTC.
- Offering small dollar mortgage loan products at under \$100,000.
- Providing services for unbanked and underbanked individuals.
- Workforce development programs, and associated housing.
- Financial coaching opportunities.

## **Scope of Evaluation in Cincinnati CSA**

The Cincinnati CSA AA received a full-scope review. This area received substantial weight in the overall bank rating as it accounted for 27 percent of total deposits and 10.5 percent of HMDA and small loans to farm and business lending during the evaluation period.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI CSA**

### **LENDING TEST**

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

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

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans |               |                |            |                       |        |
|-----------------|---------------|----------------|------------|-----------------------|--------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total  |
| Cincinnati CSA  | 31,923        | 13,515         | 144        | 272                   | 45,854 |

| Dollar Volume of Loans (\$000s) |               |                |            |                       |           |
|---------------------------------|---------------|----------------|------------|-----------------------|-----------|
| Assessment Area                 | Home Mortgage | Small Business | Small Farm | Community Development | Total     |
| Cincinnati CSA                  | 4,667,869     | 1,495,643      | 4,852      | 1,576,814             | 7,745,178 |

FTB had a deposit market share of 28.7 percent and ranked second among 58 FDIC-insured banks placing it in the top 4 percent of banks.

The bank had a market share of 6.4 percent based on the number of home mortgage loans originated or purchased and ranked second among 669 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top lender, Union Savings Bank, had a market share of 7.2 percent.

The bank had a market share of 11.5 percent based on the number of small loans to businesses originated or purchased and ranked third out of 197 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders, excluding FTB, with a combined market share of 34.1 percent were American Express National Bank (13.2 percent), U.S. Bank, N.A. (12.1 percent), and PNC Bank N.A. (8.8 percent).

The bank had a market share of 0.6 percent based on the number of small loans to farms originated or purchased and ranked 12<sup>th</sup> out of 26 small farm lenders, which placed it in the top 47 percent of lenders. The top three lenders with a combined market share of 54.3 percent were The Huntington National Bank (23.8 percent), John Deere Financial, F.S.B. (20 percent), and Peoples Bank (10.5 percent).

## Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### *Home Mortgage Loans*

Refer to Table O in the Cincinnati CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was near the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the Cincinnati CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in moderate-income geographies and approximated the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the Cincinnati CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.9 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the Cincinnati CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 23.6 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 below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth 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 272 CD loans totaling nearly \$1.6 billion, which represented 35 percent of allocated tier 1 capital. CD loans were primarily made for revitalization and stabilization purposes. By dollar volume, 54.7 percent funded revitalization and stabilization efforts, 19.6 percent funded community services targeted to low- and moderate-income individuals, 17 percent funded economic development, and 8.7 percent funded affordable housing.

Examples of CD loans include:

- \$14.3 million loan to an entity developing the largest housing project for low- and mixed-income families in the Over-the-Rhine neighborhood in Cincinnati. The project will provide 163 residential units along with 20,000 square feet of commercial space. The project is considered complex as it involved 13 different funding sources including tax credits, opportunity zone investments, conventional debt, and city funding.

- \$7.7 million loan for a LIHTC supported development of a 50-unit affordable senior housing community in Roselawn, a suburb of Greater Cincinnati. Units are restricted to renters making 30 to 60 percent of AMI. The project included funding from public and private entities including the Ohio Housing Financing Agency, the City of Cincinnati, and the Greater Cincinnati Redevelopment Authority. FTB also provided a \$10.2 million investment.
- \$100,000 line of credit to a company that is one of the nation's largest Medicaid managed care plans. The line of credit allowed the company to continue operations during the COVID-19 pandemic.

## Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 2,351 loans under flexible lending programs totaling \$336.1 million. Program volumes included 48 KHC loans totaling \$3.4 million, 33 53 Community Mortgage loans totaling \$4.1 million, 950 FHA loans totaling \$141.2 million, 780 Freddie Mac HP loans totaling \$100.1 million, 128 Fannie Mae HR loans totaling \$16.2 million, 84 USDA/RA loans totaling \$11.7 million, and 328 VA loans totaling \$59.4 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the Cincinnati CSA is rated Outstanding.

Based on a full-scope review, FTB's performance in the Cincinnati CSA was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |          |                |          |       |              |          |               |                        |          |
|-----------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Cincinnati CSA        | 74            | 63,315   | 491            | 262,737  | 565   | 100          | 326,052  | 100           | 44                     | 8,422    |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 491 investments totaling \$262.7 million during the evaluation period to over 200 organizations/projects. The dollar volume of current and prior period investments represented 7.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 93.4 percent of investments supported affordable housing, 3.5 percent funded community services to low- and moderate-income individuals, 2.7 percent supported economic development, and 0.4 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$13.6 million LIHTC investment to acquire and rehabilitate an affordable multifamily project in Hamilton, OH. The project consists of 168 units, which are also subject to a HUD Section 8 rental assistance program contract.
- \$10.5 million LIHTC investment to renovate and preserve 93 units of affordable senior housing in Cincinnati.
- \$10.1 million LIHTC investment to create 57 units of affordable senior housing in the Northside neighborhood of Cincinnati. The units are income restricted to 30 to 60 percent of the AMI. The complex will be the first LGBTQ+ senior housing development in Cincinnati.
- \$7 million equity equivalent investment and donation to a CDC and loan fund which directly impacts the Price Hill neighborhood in Cincinnati. The investment helped create the Opportunity Hub, a space for residents to connect with jobs, housing, and other needed services including a community market and food pantry.

## SERVICE TEST

The institution's performance under the Service Test in the Cincinnati CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Cincinnati CSA AA was excellent.

## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Cincinnati CSA                         | 100.0                          | 116                | 100.0                          | 4.3                                               | 22.4 | 43.1 | 29.3 | 0.9 | 8.0                                   | 19.7 | 40.2 | 30.9 | 1.2 |

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners gave positive consideration for six branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 309 ATMs in the AA, of which 252 were deposit-taking.



| Distribution of Branch Openings/Closings |                      |                      |                                                |     |     |     |    |
|------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
| Branch Openings/Closings                 |                      |                      |                                                |     |     |     |    |
| Assessment Area                          | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|                                          |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| Cincinnati CSA                           | 7                    | 16                   | 0                                              | -2  | -4  | -1  | -2 |

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened seven branches, all in middle- and upper income geographies. The bank closed 16 branches, two of which were in moderate-income geographies. The branch closures were due to reduction in branch transaction volume or grocery store locations where the store closed or was significantly remodeled.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of branches in low- and moderate-income geographies were comparable to those in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 634 qualified CD service activities to over 150 organizations logging 13,955 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 250 of these activities with over 100 employees providing 6,428 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service needs.

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

- An employee served as treasurer for an organization that provides community services to allow residents to achieve self-sufficiency. The employee provided 120 hours of service.
- Bank staff provided 82 financial education programs, which included 22 YBC sessions to over 425 students.

## Evansville, IN-KY (Evansville) MMSA

**CRA rating for the Evansville MMSA<sup>4</sup>: Outstanding**

**The Lending Test is rated: Outstanding**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was adequate and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes.

## Description of Institution's Operations in Evansville MMSA

FTB delineated the entire Evansville MMSA as its AA. Refer to appendix A for the counties reviewed.

The Evansville MMSA was FTB's 11<sup>th</sup> largest rating area based on total deposits. The bank had approximately \$2.4 billion in deposits, representing 1.4 percent of the bank's total deposits. The area was served by 18 FDIC-insured depository institutions operating 85 branches. FTB ranked second with 28 percent deposit market share. The top three banks, excluding FTB, and their deposit market share were Old National Bank (34.9 percent), United Fidelity Bank F.S.B. (7.2 percent), and German American Bank (7.1 percent). FTB operated 13 branches and 19 ATMs. During the evaluation period, the bank made \$475.9 million, or 0.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Evansville MMSA

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

---

<sup>4</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Evansville MMSA**

| Demographic Characteristics                                                                                                                                                               | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Geographies (Census Tracts)                                                                                                                                                               | 78      | 14.1          | 23.1                         | 42.3             | 17.9            | 2.6           |
| Population by Geography                                                                                                                                                                   | 314,263 | 8.9           | 19.0                         | 45.3             | 26.7            | 0.2           |
| Housing Units by Geography                                                                                                                                                                | 139,778 | 10.0          | 20.8                         | 44.9             | 24.0            | 0.3           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 85,908  | 5.7           | 13.6                         | 48.2             | 32.4            | 0.1           |
| Occupied Rental Units by Geography                                                                                                                                                        | 40,032  | 15.9          | 34.2                         | 39.3             | 10.1            | 0.5           |
| Vacant Units by Geography                                                                                                                                                                 | 13,838  | 19.3          | 27.1                         | 40.7             | 12.4            | 0.6           |
| Businesses by Geography                                                                                                                                                                   | 25,790  | 8.5           | 20.1                         | 38.3             | 29.0            | 4.1           |
| Farms by Geography                                                                                                                                                                        | 1,163   | 3.5           | 8.9                          | 55.5             | 31.5            | 0.5           |
| Family Distribution by Income Level                                                                                                                                                       | 81,857  | 21.3          | 17.6                         | 20.6             | 40.4            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 125,940 | 23.6          | 17.1                         | 17.4             | 41.9            | 0.0           |
| Median Family Income MSA - 21780<br>Evansville, IN-KY MSA                                                                                                                                 |         | \$61,595      | Median Housing Value         |                  |                 | \$118,144     |
|                                                                                                                                                                                           |         |               | Median Gross Rent            |                  |                 | \$690         |
|                                                                                                                                                                                           |         |               | Families Below Poverty Level |                  |                 | 11.1%         |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |         |               |                              |                  |                 |               |

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$30,798 and moderate-income families earned less than \$49,215. The median housing value in the AA is \$118,144. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$668 for a low-income borrower and \$1,077 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$634. Some low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 11.1 percent of families were living below the poverty level.

According to Moody's Analytics, the manufacturing industry has recovered due to strong demand for plastics, but gains are offset by a contraction in the service industry. The healthcare industry is heavily reliant on hospitals, which account for about 6.5 percent of employment, nearly double the national average. Hospitals in Evansville provide care to much of southwest Indiana and parts of Illinois and Kentucky. Large employers include Deaconess Hospital, Toyota Motor Manufacturing of Indiana, St. Vincent, Berry Global, and the University of Southern Indiana. The unemployment rate for this AA was 4.5 percent in January 2017, spiked to

14.7 percent in April 2020, and declined to 1.5 percent in December 2021. The national unemployment rate was 3.7 percent in December 2021.

## Scope of Evaluation in Evansville MMSA

The Evansville MMSA received a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN EVANSVILLE MMSA

### LENDING TEST

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

Based on a full-scope review, the bank's performance in the Evansville MMSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans |               |                |            |                       |       |
|-----------------|---------------|----------------|------------|-----------------------|-------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total |
| Evansville MMSA | 3,625         | 888            | 25         | 19                    | 4,557 |

| Dollar Volume of Loans (\$000s) |               |                |            |                       |         |
|---------------------------------|---------------|----------------|------------|-----------------------|---------|
| Assessment Area                 | Home Mortgage | Small Business | Small Farm | Community Development | Total   |
| Evansville MMSA                 | 388,438       | 85,413         | 2,007      | 121,009               | 596,867 |

FTB had a deposit market share of 28 percent and ranked second among 18 FDIC-insured banks placing it in the top 12 percent of banks.

The bank had a market share of 5.5 percent based on the number of home mortgage loans originated or purchased and ranked fourth among 313 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 32.3 percent were Evansville Teachers (18.9 percent), Mortgage Masters of Indiana (7.3 percent), and AmeriHome Mortgage Company (6.2 percent).

The bank had a market share of 6.4 percent based on the number of small loans to businesses originated or purchased and ranked fourth out of 102 small business lenders, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 47.4 percent were Old National Bank (23.9 percent), German American Bank (14.6 percent), and American Express National Bank (8.9 percent).

The bank had a market share of 0.9 percent based on the number of small loans to farms originated or purchased and ranked ninth out of 17 small farm lenders, which placed it in the top 53 percent of lenders. The top three lenders with a combined market share of 78.2 percent were Independent Bank of Kentucky (39.1 percent), John Deere Financial, F.S.B. (20.9 percent), and German American Bank (18.2 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the Evansville MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but near the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near both the percentage of owner-occupied homes in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the Evansville MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in both low- and moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the Evansville MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank made no small loans to farms in low- or moderate-income geographies.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low-and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Evansville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers approximated the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the Evansville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 9 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the Evansville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 24 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 the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the MMSA.

The Lending Activity Tables, shown above, set forth 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 19 CD loans totaling nearly \$121 million, which represented 51.4 percent of allocated tier 1 capital. Several CD loans were made for affordable housing purposes; however, by dollar volume, CD loans primarily funded economic development. By dollar volume, 76.8 percent funded economic development, 14.5 percent funded affordable housing, 5.2 percent funded revitalization and stabilization efforts, and 3.5 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$5.9 million loan for the development of a 50-unit housing project with 100 percent of the units allocated to low- and moderate-income persons. The project is spread over two sites and will also provide supportive services to residents.
- \$4.3 million loan for a LIHTC supported project to renovate 35 residential units and the construction of a single-family home with the units allocated to low- and moderate-income persons. Four units are set aside for persons with chronic homelessness. The renovation will also extend the affordability for an additional 30 years.
- \$90,000 loan to a nonprofit organization that develops affordable housing and provides supportive services for homeless persons in Evansville.

## **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 196 loans under flexible lending programs totaling \$24.4 million. Program volumes included 14 KHC loans totaling \$624,000, four 53 Community Mortgage loans totaling \$381,000, 79 FHA loans totaling \$10.1 million, 48 Freddie Mac HP loans totaling \$5.4 million, 11 Fannie Mae HR loans totaling \$1.1 million, six USDA/RA loans totaling \$853,000, and 34 VA loans totaling \$5.9 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in the Evansville MMSA is rated Outstanding.

Based on a full-scope review, the FTB's performance in the Evansville MMSA was excellent.

## **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |          |                |          |       |              |          |               |                        |          |
|-----------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Evansville MMSA       | 11            | 4,920    | 111            | 38,437   | 122   | 100          | 43,357   | 100           | 8                      | 194      |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 111 investments totaling \$38.4 million during the evaluation period to approximately 50 organizations/projects. The dollar volume of current and prior period investments represented 18.4 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 97.6 percent of investments supported affordable housing, 1.4 percent funded community services to low- and moderate-income individuals, 0.7 percent supported economic development, and 0.3 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$8.3 million investment for the development of a 50-unit affordable housing development in Evansville for low-income residents. The development was also the recipient of a Federal Home Loan Bank Affordable Housing Program grant.
- \$7.9 million investment in a 49-unit apartment affordable housing development for seniors in Henderson, KY. Units are income restricted to 60 percent or less of the AMI.
- \$5 million investment in a 27-unit permanent supportive housing designed for individuals who experience chronic homelessness in Evansville. Twelve of the units are designated for individuals who are “medically vulnerable,” in addition to experiencing chronic homelessness.

## SERVICE TEST

The institution's performance under the Service Test in the Evansville MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Evansville MMSA AA was excellent.



## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Evansville MMSA                        | 100.0                          | 13                 | 100.0                          | 7.7                                               | 15.4 | 61.5 | 15.4 | 7.7 | 8.9                                   | 19.0 | 45.3 | 26.7 | 0.2 |

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. Examiners gave positive consideration for one branch in a middle- or upper income geography that was on the opposite side of the street from a low- or moderate-income geography. Examiners also gave positive consideration for one middle- or upper income branch where the percentage of usage by low- and moderate-income households equaled or exceeded the low- and moderate-income population percentage in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 19 ATMs in the AA, of which 17 were deposit-taking.

| 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 |
| Evansville MMSA                          | 1                    | 4                    | 0                                           | -1  | -1  | -1  | 0  |

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened and closed one branch in a geography with an "NA" income classification. The bank closed three additional branches, one of which was in a moderate-income geography. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 77 qualified CD service activities to 23 organizations logging 2,129 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in

47 of these activities with 20 employees providing 1,310 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and affordable housing needs.

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

- An employee served as board chair and a member of the executive committee of an organization that provides services to low- and moderate-income disabled persons. The employee provided 100 hours of service.
- Bank staff provided 18 financial education programs, which included two YBC sessions which reached over 40 students.

## Louisville/Jefferson County, KY-IN (Louisville) MMSA

**CRA rating for the Louisville MMSA<sup>5</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was adequate and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. FTB made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Louisville MMSA

FTB delineated a portion of the Louisville MMSA as its AA. Refer to appendix A for a list of the counties reviewed.

The Louisville MMSA was FTB's eighth largest rating area based on total deposits. The bank had approximately \$3.9 billion in deposits, representing 2.3 percent of its total deposits. The area was served by 39 FDIC-insured depository institutions operating 353 branches. FTB ranked third with 10 percent deposit market share. The top three banks, excluding FTB, and their deposit market share include PNC Bank N.A. (21.8 percent), JPMorgan Chase Bank, N.A. (18.9 percent), and Republic Bank and Trust Company (9.5 percent). FTB operated 33 branches and 58 ATMs representing 3 percent of total branches and 2.5 percent of ATMs. During the evaluation period, the bank made nearly \$1.5 billion, or 2.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Louisville MMSA

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

---

<sup>5</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

| Table A – Demographic Information of the Assessment Area                                                                                                                                  |           |               |                              |                  |                 |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Louisville MMSA                                                                                                                                                          |           |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                               | #         | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                               | 260       | 13.5          | 20.8                         | 35.0             | 30.0            | 0.8           |
| Population by Geography                                                                                                                                                                   | 1,052,217 | 10.0          | 18.3                         | 38.6             | 32.7            | 0.3           |
| Housing Units by Geography                                                                                                                                                                | 458,971   | 10.6          | 19.7                         | 38.4             | 30.9            | 0.5           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 269,423   | 4.7           | 14.7                         | 41.0             | 39.4            | 0.1           |
| Occupied Rental Units by Geography                                                                                                                                                        | 145,148   | 18.5          | 27.2                         | 35.0             | 18.4            | 0.9           |
| Vacant Units by Geography                                                                                                                                                                 | 44,400    | 20.5          | 24.7                         | 33.3             | 20.1            | 1.3           |
| Businesses by Geography                                                                                                                                                                   | 114,778   | 8.0           | 15.3                         | 32.3             | 41.0            | 3.4           |
| Farms by Geography                                                                                                                                                                        | 3,017     | 4.1           | 10.3                         | 40.1             | 44.6            | 0.8           |
| Family Distribution by Income Level                                                                                                                                                       | 261,549   | 21.1          | 17.3                         | 19.7             | 42.0            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 414,571   | 24.8          | 15.6                         | 17.5             | 42.0            | 0.0           |
| Median Family Income MSA - 31140<br>Louisville/Jefferson County, KY-IN MSA                                                                                                                |           | \$64,965      | Median Housing Value         |                  |                 | \$162,956     |
|                                                                                                                                                                                           |           |               | Median Gross Rent            |                  |                 | \$751         |
|                                                                                                                                                                                           |           |               | Families Below Poverty Level |                  |                 | 10.7%         |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |           |               |                              |                  |                 |               |

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the table, low-income families earned less than \$32,483 and moderate-income families earned less than \$51,972. The median housing value in the AA is \$162,956. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$812 for a low-income borrower and \$1,299 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$857. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.7 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, the Louisville economy is growing at an average rate since the recession. The unemployment rate is nearing pre-pandemic levels; however, forward economic momentum has slowed. Slowing population growth is constraining economic potential. Some area strengths are the demand for locally produced trucks and sports-utility vehicles, a strategic location within close proximity to two-thirds of the nation's population, and a low cost of doing business. Housing prices and permits are increasing.

Manufacturing, professional and business services, education and health services, and government are important drivers of the economy. The largest employers are United Parcel Service, Fort Knox, Norton Healthcare, Ford Motor Company, and Humana.

The unemployment rate for the Louisville MMSA was 4.6 percent as of January 2017. Unemployment levels significantly increased from 4.1 percent in March 2020 to 16.8 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Louisville MMSA was 2.9 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

In November 2021, the OCC held a listening session with organizations located within the Louisville MMSA to better understand area credit and community needs. Participating organizations focus their efforts in the areas of affordable housing, small business development, and community services. Participants expressed that affordable housing remains a key need in the community, especially given the rapid appreciation in the price of homes and rents within the metro. Participants also identified the rising costs of utilities as problematic in the affordable housing space. The need for CD services exists in the market. Participants described how unbanked and underbanked individuals need paths for entry into the banking system and communication directly with bankers would be an avenue. Individuals also described the need for products and services that eliminate overdraft fees. Needs in the MMSA include:

- Affordable single and multifamily housing, with the latter potentially created through LIHTC investments.
- Access to small business credit.
- Workforce development training, including career training for residents in financial services.
- Redevelopment of vacant and abandoned properties in west Louisville.

## **Scope of Evaluation in Louisville MMSA**

The Louisville MMSA received a full-scope review. FTB did not originate or purchase enough small loans to farms in the Louisville MMSA to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISVILLE MMSA**

### **LENDING TEST**

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

Based on a full-scope review, the bank's performance in the Louisville MMSA was excellent.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans</b> |               |                |            |                       |        |
|------------------------|---------------|----------------|------------|-----------------------|--------|
| Assessment Area        | Home Mortgage | Small Business | Small Farm | Community Development | Total  |
| Louisville MMSA        | 8,566         | 2,336          | 11         | 56                    | 10,969 |

| <b>Dollar Volume of Loans (\$000s)</b> |               |                |            |                       |           |
|----------------------------------------|---------------|----------------|------------|-----------------------|-----------|
| Assessment Area                        | Home Mortgage | Small Business | Small Farm | Community Development | Total     |
| Louisville MMSA                        | 1,252,908     | 236,370        | 1,114      | 181,511               | 1,671,903 |

FTB had a deposit market share of 10 percent and ranked third among 39 FDIC-insured banks placing it in the top 8 percent of banks.

The bank had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased and ranked sixth among 530 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 15.7 percent were Rocket Mortgage (5.7 percent), United Wholesale Mortgage, LLC (5.1 percent), and Home Point Financial Corporation (5 percent).

The bank had a market share of 3.7 percent based on the number of small loans to businesses originated or purchased and ranked eighth out of 165 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 34.8 percent were Stock Yards Bank & Trust Company (12.5 percent), American Express National Bank (11.8 percent), and PNC Bank N.A. (10.5 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

Refer to Table O in the Louisville MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but near the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the Louisville MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the Louisville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the Louisville MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the MMSA.

The Lending Activity Tables, shown above, set forth 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 56 CD loans totaling nearly \$181.5 million, which represented 47 percent of allocated tier 1 capital. By dollar volume, 18.8 percent of these loans funded affordable housing, 11.5 percent funded economic development, 39.8 percent funded revitalization and stabilization efforts, and 29.9 percent funded community services targeted to low- and moderate-income individuals.

Examples of community development loans include:

- \$13.3 million construction loan to develop a 312-unit LIHTC apartment complex in South Louisville. Units are affordable to households earning 60 percent or less of the AMI. The project involved multiple layers of financing including tax exempt bonds and LIHTC issued by the KHC and loan financing involving other financial institutions.
- \$1 million line of credit to a nonprofit organization that provides community services to low- and moderate-income families and individuals. The line helps the organization manage cash flows to support services between payment of pledges and donations.
- \$750,000 line of credit to a nonprofit organization to help them manage and maintain 900 affordable housing units for persons earning less than 30 percent of AMI. This is the first nonprofit in Kentucky to be approved by HUD to offer their eligible residents the Family Self-Sufficiency Program designed to assist residents in increasing their income and exiting subsidized housing.

## **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 508 loans totaling \$67.4 million under flexible lending programs. Program volumes included 93 KHC loans totaling \$6.3 million, 21 53 Community Mortgage loans totaling \$2.6 million, 182 FHA loans totaling \$26.4 million, 97 Freddie Mac HP loans totaling \$12.5 million, 27 Fannie Mae HR loans totaling \$3.4 million, two Fannie Mae RN loans totaling \$351,000, 13 USDA/RA loans totaling \$2.2 million, and 73 VA loans totaling \$13.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in the Louisville MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Louisville MMSA was excellent.

## **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.



| Qualified Investments |               |          |                |          |       |              |          |               |                        |          |
|-----------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Louisville MMSA       | 20            | 9,844    | 202            | 39,299   | 222   | 100          | 49,143   | 100           | 14                     | 1,452    |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 202 investments totaling \$39.3 million during the evaluation period to over 80 organizations/projects. The dollar volume of current and prior period investments represented 12.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 94.6 percent of investments supported affordable housing, 3.6 percent funded community services to low- and moderate-income individuals, 1.5 percent supported economic development, and 0.2 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$14 million investment in a 312-unit LIHTC complex in Louisville, KY. Units are income restricted up to 60 percent of the AMI. Additional services offered to residents include onsite weekly healthcare services, after-school activities for children, tutoring, and financial planning seminars.
- \$11.9 million investment in a LIHTC project that will create 38 units of affordable housing in New Albany, IN. Through a federal lease-to-purchase program, residents would be eligible to buy their unit after living there for at least 15 years.
- \$6.1 million investment in a LIHTC project that will provide 44 units of affordable senior housing in Shelbyville, KY.

## SERVICE TEST

The institution's performance under the Service Test in the Louisville MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Louisville MMSA was excellent.

## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Louisville MMSA                        | 100.0                          | 33                 | 100.0                          | 12.1                                              | 18.2 | 27.3 | 42.4 | 0.0 | 10.0                                  | 18.3 | 38.6 | 32.7 | 0.3 |

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for two branches in middle- or upper-income geographies that were on the opposite side of the street from a low- or moderate-income geography and seven middle- or upper income branches where the percentage of usage by low- and moderate-income households equaled or exceeded the percentage of low- and moderate-income populations in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 58 ATMs in the AA, of which 53 were deposit-taking.

| Distribution of Branch Openings/Closings |                      |                      |                                                |     |     |     |    |
|------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
| Branch Openings/Closings                 |                      |                      |                                                |     |     |     |    |
| Assessment Area                          | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|                                          |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| Louisville MMSA                          | 1                    | 7                    | 0                                              | 0   | -5  | -1  | 0  |

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. During the evaluation period, the bank opened one branch and closed seven branches, with all activity in middle- and upper income geographies. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to those in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 287 qualified CD service activities to approximately 90 organizations logging 4,030 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 133 of these activities with 25 employees providing 3,119 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community services to low- and moderate-income individuals.

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

- An employee of the bank served on the board of an affordable housing organization serving Louisville and Southern Indiana. The employee provided 100 hours of service.
- Bank employees provided 89 financial education programs.

## South Bend-Elkhart-Mishawaka, IN-MI (South Bend) CSA

**CRA rating for the South Bend CSA<sup>6</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was adequate, and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. FTB made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and data provided by the bank, and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in South Bend CSA

FTB delineated a portion of the South Bend-Elkhart-Mishawaka, IN-MI (South Bend) CSA as its AA. It includes the South Bend-Mishawaka, IN-MI MSA, the Elkhart-Goshen, IN MSA, and the Niles, MI MSA in their entirety. Refer to appendix A for the counties reviewed.

The South Bend CSA was FTB's 13th largest rating area based on total deposits. The bank had approximately \$1.2 billion in deposits, representing 0.7 percent of the bank's total deposits. The area was served by 20 FDIC-insured banks operating 163 branches. FTB ranked fourth with 9.4 percent deposit market share. The top three banks and their deposit market share included 1<sup>st</sup> Source Bank (30.6 percent), JPM Chase Bank, N.A. (16.1 percent), and Lake City Bank (14 percent). FTB operated 12 branches and 20 ATMs. During the evaluation period, the bank made \$428 million, or 0.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### South Bend CSA

The following table provides a summary of the demographics including housing, business, and economic information for the South Bend CSA AA.

---

<sup>6</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

| Table A – Demographic Information of the Assessment Area                                                                                                                                  |         |               |                              |                  |                 |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: South Bend CSA                                                                                                                                                           |         |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                               | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                               | 171     | 11.1          | 19.3                         | 48.0             | 21.1            | 0.6           |
| Population by Geography                                                                                                                                                                   | 675,448 | 6.4           | 16.4                         | 52.6             | 24.6            | 0.0           |
| Housing Units by Geography                                                                                                                                                                | 295,912 | 7.2           | 16.0                         | 55.1             | 21.7            | 0.0           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 178,768 | 3.4           | 12.6                         | 56.1             | 28.0            | 0.0           |
| Occupied Rental Units by Geography                                                                                                                                                        | 74,944  | 14.6          | 23.0                         | 50.2             | 12.2            | 0.0           |
| Vacant Units by Geography                                                                                                                                                                 | 42,200  | 10.3          | 18.0                         | 59.8             | 11.9            | 0.0           |
| Businesses by Geography                                                                                                                                                                   | 54,131  | 7.7           | 15.2                         | 51.7             | 25.4            | 0.0           |
| Farms by Geography                                                                                                                                                                        | 2,160   | 1.7           | 6.9                          | 63.1             | 28.2            | 0.0           |
| Family Distribution by Income Level                                                                                                                                                       | 169,974 | 21.0          | 17.5                         | 21.1             | 40.5            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 253,712 | 23.1          | 16.8                         | 18.3             | 41.7            | 0.0           |
| Median Family Income MSA - 21140 Elkhart-Goshen, IN MSA                                                                                                                                   |         | \$55,551      | Median Housing Value         |                  |                 | \$122,527     |
| Median Family Income MSA - 35660 Niles, MI MSA                                                                                                                                            |         | \$57,640      | Median Gross Rent            |                  |                 | \$699         |
| Median Family Income MSA - 43780 South Bend-Mishawaka, IN-MI MSA                                                                                                                          |         | \$57,692      | Families Below Poverty Level |                  |                 | 12.7%         |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |         |               |                              |                  |                 |               |

According to Moody's Analytics, South Bend's recovery has slowed. Manufacturing's recovery remains lackluster compared with most of the state. On the other hand, slow growth has not stopped the metro area's strong education and healthcare sectors from outperforming most of the U.S., and leisure/hospitality is a standout, helped by a more normal academic year for the college town. The recovery of the labor force continues to stutter, but the unemployment rate is trending toward its pre-pandemic low. The unemployment rate was 4.8 percent in January 2017, rising to 21.1 percent in April 2020, and was 1.8 percent in December 2021. The area's largest employers were St. Joseph's Regional Medical Center, University of Notre Dame, MSM Holdco LLC, and Beacon Health System. Demographic challenges, owing in part to an inability to retain Notre Dame graduates, will keep the housing market lukewarm. Single-family home price growth remains historically high, though not as impressive as it is nationally.

## Scope of Evaluation in South Bend CSA

The South Bend CSA received a full-scope review. For purposes of this evaluation, examiners combined the bank's delineated AA into one and aggregated the data at the CSA level for purposes of analysis and presentation.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH BEND CSA

### LENDING TEST

The bank's performance under the Lending Test in the South Bend CSA is rated Outstanding.

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

#### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans |               |                |            |                       |       |
|-----------------|---------------|----------------|------------|-----------------------|-------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total |
| South Bend CSA  | 2,507         | 958            | 51         | 20                    | 3,536 |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

| Dollar Volume of Loans (\$000s) |               |                |            |                       |         |
|---------------------------------|---------------|----------------|------------|-----------------------|---------|
| Assessment Area                 | Home Mortgage | Small Business | Small Farm | Community Development | Total   |
| South Bend CSA                  | 332,416       | 89,004         | 6,581      | 62,564                | 490,565 |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

FTB had a deposit market share of 9.4 percent and ranked fourth among 20 FDIC-insured banks, which placed it in the top 20 percent of banks.

The bank had a market share of 2.1 percent based on the number of home mortgage loans originated or purchased and ranked 14<sup>th</sup> among 501 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 16.9 percent were Rocket Mortgage (6.3 percent), Notre Dame Federal Credit Union (5.6 percent), and United Federal Credit Union (5 percent).

The bank had a market share of 3.6 percent based on the number of small loans to businesses originated or purchased and ranked eighth out of 138 small business lenders, which placed it in the top six percent of lenders. The top three lenders with a combined market share of 37.3 percent were 1<sup>st</sup> Source Bank (19.5 percent), JPMorgan Chase Bank, N.A. (9.2 percent), and American Express National Bank (8.6 percent).

The bank had a market share of 1.3 percent based on the number of small loans to farms originated or purchased and ranked 12<sup>th</sup> out of 22 small farm lenders, which placed it in the top 55 percent of lenders. The top three lenders with a combined market share of 61 percent were 1<sup>st</sup> Source Bank (28.1 percent), John Deere Financial, F.S.B. (20 percent), and Lake City Bank (12.9 percent).

#### Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the South Bend CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in low-income geographies and was below the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies and near the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the South Bend CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was near the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the South Bend CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not make any small loans to farms in low- and moderate-income geographies during the evaluation period.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the South Bend CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and equaled the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the South Bend CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.3 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the South Bend CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 17.6 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 below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in the CSA.

The Lending Activity Tables, shown above, set forth 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 20 CD loans totaling nearly \$62.6 million, which represented 54.3 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 74.2 percent funded economic development, 0.1 percent funded revitalization and stabilization efforts, and 25.7 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$10 million line of credit to a manufacturing company located in South Bend. Over 74 percent of the employees earn less than 80 percent of the MSA median income. The line of credit allowed the company to retain 284 jobs.
- \$3 million working capital line of credit to a manufacturing company located in South Bend. Nearly 65 percent of the employees earn less than 80 percent of the MSA median income. The line of credit allowed the company to create four jobs and retain 33 jobs.
- \$2.5 million working capital line of credit to a manufacturing company located in Mishawaka, IN. Nearly 55 percent of the employees earn less than 80 percent of the MSA median income. The loan allowed the company to create 10 jobs.

## Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 183 loans under flexible lending programs specific to the AA totaling \$21.9 million. Program volumes included 10 MSHDA loans totaling \$509,000, one 53 Community Mortgage loans totaling \$157,000, 70 FHA loans totaling \$9.2 million, 56 Freddie Mac HP loans totaling \$5.7 million, 12 Fannie Mae HR loans totaling \$1.2 million, one Fannie Mae RN loans totaling \$122,000, two USDA/RA loans totaling \$348,000, and 31 VA loans totaling \$4.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## INVESTMENT TEST

The institution's performance under the Investment Test in the South Bend CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the South Bend CSA was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |              |                |              |           |              |               |               |                        |            |
|-----------------------|---------------|--------------|----------------|--------------|-----------|--------------|---------------|---------------|------------------------|------------|
| Assessment Area       | Prior Period* |              | Current Period |              | Total     |              |               |               | Unfunded Commitments** |            |
|                       | #             | \$(000s)     | #              | \$(000s)     | #         | % of Total # | \$(000s)      | % of Total \$ | #                      | \$(000s)   |
| South Bend CSA        | 18            | 4,504        | 45             | 7,752        | 63        | 100          | 12,256        | 100           | 14                     | 381        |
| <b>Total</b>          | <b>18</b>     | <b>4,504</b> | <b>45</b>      | <b>7,752</b> | <b>63</b> | <b>100</b>   | <b>12,256</b> | <b>100</b>    | <b>14</b>              | <b>381</b> |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.



The bank made 45 investments totaling \$7.7 million during the evaluation period, to over 30 organizations/projects. The dollar volume of current and prior period investments represented 10.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97 percent of investments supported affordable housing, 1.6 percent funded community services to low- and moderate-income individuals, 1.2 percent supported economic development, and 0.2 percent supported revitalization and stabilization efforts. The institution occasionally used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$4.8 million investment in a 40-unit LIHTC senior housing complex in Middlebury, IN. Units participate in the Section 8 Rental Assistance Program and are income restricted to persons earning up to 30 percent of AMI.
- \$2.6 million investment in a 56-unit LIHTC senior housing apartment building in Watervliet, MI. Units participate in the Section 8 Rental Assistance Program and are income restricted to persons earning up to 30 percent of AMI.
- \$75,000 (\$15,000 in each year of the evaluation period) to support an organization involved in economic development and small business support services in southwest Michigan.

## SERVICE TEST

The institution's performance under the Service Test in the South Bend CSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the South Bend CSA was good.

## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |     |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|-----|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| South Bend CSA                         | 100.0                          | 12                 | 100.0                          | 25.0                                              | 0.0 | 58.3 | 16.7 | 0.0 | 6.4                                   | 16.4 | 52.6 | 24.6 | 0.0 |

\* Totals may not equal 100.0 percent due to rounding.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. There are no branches located in moderate-income geographies. Examiners gave positive consideration for one branch in a middle- or upper-income geography that was on the opposite side of the street from a low- or moderate-income geography and four middle- or upper income branches where the percentage of usage by low- and moderate-income households equaled or exceeded the percentage of low- and moderate-income populations in the AA.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 20 ATMs in the AA, of which 16 were deposit-taking.

| Distribution of Branch Openings/Closings |                      |                      |                                                |     |     |     |    |
|------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
| Branch Openings/Closings                 |                      |                      |                                                |     |     |     |    |
| Assessment Area                          | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|                                          |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| South Bend CSA                           | 0                    | 3                    | 0                                              | 0   | -2  | -1  | 0  |

To the extent changes have been made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed three branches, all in middle- and upper income geographies. The branch closures were short distance consolidations due to the reduction in branch transaction volumes.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours were the same for branches in low- and moderate-income geographies compared to branches in middle- and upper income geographies

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 68 qualified CD service activities to approximately 40 organizations logging 1,544 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 28 of these activities with 14 employees providing 1,166 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community service and economic development needs.

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

- A bank employee served on the board of an economic development organization in Niles, MI. The employee provided 200 hours of service.
- Bank staff provided 32 financial education programs.

## State Ratings

### State of Florida

**CRA rating for the State of Florida:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans and overall distribution of loans by borrower income and businesses of different sizes were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes.

### Description of Institution's Operations in Florida

FTB delineated six AAs in Florida. They include a portion of Cape Coral-Fort Myers-Naples (Cape Coral) CSA; a portion of the Jacksonville MSA; the Miami- Fort Lauderdale-Pompano Beach (Miami) MSA in its entirety; a portion of the North Port-Sarasota (North Port) CSA; a portion of the Orlando-Lakeland-Deltona (Orlando) CSA; and a portion of the Tampa-St. Petersburg-Clearwater, FL (Tampa) MSA. Refer to appendix A for a complete list of the counties reviewed.

Florida was FTB's fifth largest rating area based on deposits. FTB had \$14.2 billion in deposits in these AAs, which represented 8.4 percent of the bank's total deposits. There were 149 FDIC-insured banks in the combined areas operating 3,570 branch offices. The bank ranked 12<sup>th</sup> in deposit market share with two percent. The top three competitors and their market share included Bank of America, N.A. (21.5 percent), Wells Fargo Bank, N.A. (13 percent), and Truist Bank (10 percent). FTB had 157 office locations and 393 ATMs within the combined areas. During the evaluation period, the bank made \$7.8 billion or 13.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Tampa MSA

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

| Table A – Demographic Information of the Assessment Area                                                                                                                                  |           |               |                              |                  |                 |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Tampa MSA                                                                                                                                                                |           |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                               | #         | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                               | 701       | 5.8           | 24.8                         | 35.4             | 31.7            | 2.3           |
| Population by Geography                                                                                                                                                                   | 2,713,649 | 4.8           | 23.1                         | 36.9             | 34.8            | 0.4           |
| Housing Units by Geography                                                                                                                                                                | 1,284,294 | 4.6           | 24.1                         | 38.2             | 32.9            | 0.2           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 682,598   | 2.1           | 20.2                         | 38.2             | 39.4            | 0.1           |
| Occupied Rental Units by Geography                                                                                                                                                        | 392,451   | 8.8           | 28.4                         | 38.2             | 24.1            | 0.4           |
| Vacant Units by Geography                                                                                                                                                                 | 209,245   | 5.1           | 28.7                         | 38.0             | 28.1            | 0.1           |
| Businesses by Geography                                                                                                                                                                   | 514,490   | 4.3           | 19.7                         | 33.1             | 42.6            | 0.3           |
| Farms by Geography                                                                                                                                                                        | 11,620    | 3.4           | 22.9                         | 37.6             | 36.0            | 0.1           |
| Family Distribution by Income Level                                                                                                                                                       | 654,604   | 21.3          | 17.6                         | 18.8             | 42.3            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 1,075,049 | 23.8          | 16.1                         | 17.3             | 42.8            | 0.0           |
| Median Family Income MSA - 45300<br>Tampa-St. Petersburg-Clearwater, FL MSA                                                                                                               |           | \$58,916      | Median Housing Value         |                  |                 | \$158,005     |
|                                                                                                                                                                                           |           |               | Median Gross Rent            |                  |                 | \$983         |
|                                                                                                                                                                                           |           |               | Families Below Poverty Level |                  |                 | 11.2%         |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |           |               |                              |                  |                 |               |

The housing market in the Tampa, FL MSA is strong. Growth in the Gulf Coast of Florida was partially driven by out-of-towners from places like Chicago, New York, New Jersey, and Connecticut moving to the region and working remotely, as well as investors who may be buying second homes and planning to retire in the area. Together, these factors have increased pressure on overall housing inventory, which resulted in an increased number of renters in the area.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$29,458 and moderate-income families earned less than \$47,133. The median housing value in the AA is \$158,005. The NAR median sales price at the end of 2021 was \$330,000. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$736 for a low-income borrower and \$1,178 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$848. Based on these calculations, low-income borrowers and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.2 percent of families were living below the poverty level.

## **Economic Data**

According to Moody's Analytics, the Tampa area economy is recovering vigorously from the recession at a rate superior to the national recovery rate. By September 2021, payroll employment surpassed the metro area's pre-recession peak driven by a resurgence in professional services, transportation, and improving tourism. Longer-term strengths include low tax burdens and office rents, robust in-migration, and strong tourism. A key longer-term weakness is Tampa's exposure to shifts in the nation's business cycle due to its large tourism economic base and high living costs relative to income levels. Tourism in Tampa was more resistant to COVID-19 related lockdowns compared with its cross-state rivals. Area visitors are primarily drawn to its expansive beaches, which were less impacted by social distancing requirements. Housing prices are rising rapidly, and housing permits are increasing. Professional and business services, education and health services, government, and retail trade are important economic drivers. The largest employers are BayCare Health System, Publix Super Markets, Hillsborough County School District, HCA West Florida Division, and MacDill Air Force Base.

The unemployment rate for the Tampa MSA was 4.7 percent as of January 2017. Unemployment levels significantly increased from 5.5 percent in March 2020 to 13.9 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined with the unemployment rate at 3.3 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

The OCC completed a community contact in the Tampa MSA to better understand area credit and community needs. This contact focused on affordable housing development. The individual's organization has also focused on affordable housing for children aging out of the foster care system. The contact expressed a need for more affordable housing. The contact spoke about the need for increased affordable housing capacity, and also knowledge about programs in the community. The contact expressed that in addition to affordable housing, economic development needs to occur in low- and moderate-income areas to support business development and in turn local jobs. The greatest needs in the MSA include:

- Affordable housing.
- Economic development for small businesses.
- Program funding for organizations that work on affordable housing, temporary housing, and shelters.
- Technical assistance to small businesses.

## **Scope of Evaluation in Florida**

The Tampa MSA received a full-scope review. This area accounted for nearly 24 percent of deposits and 22 percent of lending within the state during the evaluation period. The remaining AAs received limited-scope reviews. FTB did not originate or purchase enough small loans to farms in the state of Florida to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA LENDING TEST**

The bank's performance under the Lending Test in the State of Florida is rated Outstanding. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Tampa MSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans*</b> |               |                |            |                       |        |                |                  |
|-------------------------|---------------|----------------|------------|-----------------------|--------|----------------|------------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total  | % State* Loans | % State Deposits |
| Tampa MSA               | 5,225         | 3,733          | 13         | 22                    | 8,993  | 22.3           | 23.9             |
| Cape Coral CSA          | 5,213         | 3,449          | 5          | 25                    | 8,692  | 21.6           | 33.5             |
| Jacksonville MSA        | 1,373         | 848            | 1          | 23                    | 2,245  | 5.6            | 5.6              |
| Miami MSA               | 3,515         | 1,173          | 0          | 21                    | 4,709  | 11.7           | 5.8              |
| North Port CSA          | 2,897         | 1,503          | 6          | 8                     | 4,414  | 11.0           | 9.5              |
| Orlando CSA             | 6,073         | 5,088          | 5          | 45                    | 11,211 | 27.8           | 21.6             |
| Total                   | 24,296        | 15,794         | 30         | 144                   | 40,264 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |               |                |            |                       |           |               |                  |
|-----------------------------------------|---------------|----------------|------------|-----------------------|-----------|---------------|------------------|
| Assessment Area                         | Home Mortgage | Small Business | Small Farm | Community Development | Total     | % State Loans | % State Deposits |
| Tampa MSA                               | 1,265,398     | 258,573        | 595        | 114,305               | 1,638,871 | 18.6          | 23.9             |
| Cape Coral CSA                          | 1,431,316     | 248,748        | 111        | 73,143                | 1,753,318 | 19.9          | 21.6             |
| Jacksonville MSA                        | 373,759       | 87,579         | 13         | 181,632               | 642,983   | 7.3           | 5.6              |
| Miami MSA                               | 1,299,394     | 186,866        | 0          | 357,907               | 1,844,167 | 21.0          | 5.8              |
| North Port CSA                          | 707,867       | 124,337        | 508        | 49,872                | 882,584   | 10.0          | 9.5              |
| Orlando CSA                             | 1,429,103     | 358,556        | 153        | 249,860               | 2,037,672 | 23.2          | 21.6             |
| Total                                   | 6,506,837     | 1,264,659      | 1,380      | 1,026,719             | 8,799,595 | 100.0         | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 3 percent and ranked seventh among 53 FDIC-insured banks, which placed it in the top 14 percent of banks.

The bank had a market share of one percent based on the number of home mortgage loans originated or purchased and ranked 25<sup>th</sup> among 1,148 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 17 percent were Rocket Mortgage (7.6 percent), United Wholesale Mortgage (5.7 percent), and Wells Fargo Bank, N.A. (3.7 percent).

The bank had a market share of 1.6 percent based on the number of small loans to businesses originated or purchased and ranked 14<sup>th</sup> out of 228 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 37.3 percent were American Express National Bank (14.9 percent), Bank of America, N.A. (14 percent), and JPMorgan Chase Bank, N.A. (8.4 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of State of Florida 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was near both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans by all lenders. The bank's percentage of home mortgage loans in middle-income geographies was near the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of State of Florida 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of State of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and exceeded the aggregate distribution of loans by all lenders.

The high cost of housing and the poverty level in the AA limited opportunities for home mortgage lending, particularly to low-income families.

### ***Small Loans to Businesses***

Refer to Table R in the state of State of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11.4 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Florida.

The Lending Activity Tables, shown above, set forth 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 22 CD loans totaling nearly \$114.3 million, which represented 33.9 percent of allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 0.2 percent of these loans funded affordable housing, 14.3 percent funded economic development, 81.3 percent funded revitalization and stabilization efforts, and 4.1 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$17 million line of credit, enabling a telecommunications business to supplement greater payroll amounts for current and additional contract employees to respond to the declared disaster area caused by Hurricane Irma.
- \$4.7 million loan to a nonprofit organization that supports victims of domestic violence with emergency shelter, economic empowerment programs, and legal advocacy,
- \$2 million line of credit that enabled a business to retain jobs and expand its operations. The majority of the business's employees are low- and moderate-income persons.



## Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 159 loans under flexible lending programs specific to the AA totaling \$32.4 million. Program volumes include 80 FHA loans totaling \$15.7 million, 15 Freddie Mac HP loans totaling \$2.5 million, 14 Fannie Mae HR loans totaling \$2.1 million, one USDA/RA loans totaling \$175,000, 49 VA loans totaling \$12 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Miami MSA, North Port CSA, and the Orlando CSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance under the Lending Test in the Cape Coral CSA and Jacksonville MSA was weaker than the bank's overall performance because of weaker geographic distribution of loans. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data supporting these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |                |               |                |                |            |              |                |               |                         |              |
|------------------------|----------------|---------------|----------------|----------------|------------|--------------|----------------|---------------|-------------------------|--------------|
| Assessment Area        | Prior Period** |               | Current Period |                | Total      |              |                |               | Unfunded Commitments*** |              |
|                        | #              | \$(000s)      | #              | \$(000s)       | #          | % of Total # | \$(000s)       | % of Total \$ | #                       | \$(000s)     |
| Tampa MSA              | 7              | 13,678        | 130            | 39,436         | 137        | 19.9         | 53,114         | 21.0          | 4                       | 921          |
| Cape Coral CSA         | 6              | 8,455         | 162            | 42,235         | 168        | 24.4         | 50,690         | 20.0          | 3                       | 796          |
| Jacksonville MSA       | 2              | 1,163         | 53             | 6,883          | 55         | 8.0          | 8,046          | 3.2           | 1                       | 96           |
| Miami MSA              | 9              | 7,677         | 63             | 26,274         | 72         | 10.4         | 33,951         | 13.4          | 1                       | 209          |
| North Port CSA         | 7              | 4,537         | 53             | 10,307         | 60         | 8.7          | 14,844         | 5.9           | 3                       | 157          |
| Orlando CSA            | 12             | 20,603        | 185            | 71,722         | 197        | 28.6         | 92,325         | 36.5          | 8                       | 358          |
| <b>Total</b>           | <b>43</b>      | <b>56,113</b> | <b>646</b>     | <b>196,857</b> | <b>689</b> | <b>100</b>   | <b>252,970</b> | <b>100</b>    | <b>20</b>               | <b>2,537</b> |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 130 investments totaling \$39.4 million during the evaluation period to approximately 80 organizations/projects. The dollar volume of current and prior period investments represented 15.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 89.5 percent of investments supported affordable housing, 9.1 percent funded community services to low- and moderate-income individuals, and 1.4 percent supported economic development. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$8.2 million investment in a 110-unit affordable apartment community in Dade City. Ninety percent of the units are set aside for residents earning up to 60 percent of the AMI and 10 percent of the units are set aside for residents earning up to 40 percent of the AMI.
- \$4.8 million investment in an 81-unit LIHTC senior rental housing complex in Valrico. Units are income restricted to residents earning less than 60 percent of the AMI. This was a public-private partnership that included Hillsborough County in financing the project.
- \$2.9 million in multiple donations to a foundation to support scholarships to low- and moderate-income students in pre-kindergarten to 12<sup>th</sup> grade.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cape Coral CSA, Jacksonville MSA, Miami MSA, North Port CSA, and Orlando CSA was consistent with the bank's overall performance. Performance in the limited-scope areas supports the overall Investment Test rating.

## **SERVICE TEST**

The bank's performance under the Service Test in Florida is rated High Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Tampa MSA was excellent. Performance in limited-scope areas lowered the Service Test rating in the state.

## Retail Banking Services

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Tampa MSA                               | 23.9                           | 39                 | 24.8                           | 7.7                                               | 20.5 | 28.2 | 43.6 | 0.0 | 4.8                                   | 23.1 | 36.9 | 34.8 | 0.4 |
| Cape Coral CSA                          | 33.5                           | 35                 | 22.3                           | 0.0                                               | 28.6 | 31.4 | 40.0 | 0.0 | 5.5                                   | 25.9 | 40.8 | 27.8 | 0.0 |
| Jacksonville MSA                        | 5.6                            | 11                 | 7.0                            | 0.0                                               | 45.5 | 0.0  | 54.5 | 0.0 | 5.5                                   | 23.8 | 38.4 | 32.2 | 0.0 |
| Miami MSA                               | 5.8                            | 9                  | 5.7                            | 11.1                                              | 22.2 | 11.1 | 55.6 | 0.0 | 5.8                                   | 28.9 | 31.5 | 33.4 | 0.4 |
| North Port CSA                          | 9.5                            | 22                 | 14.0                           | 0.0                                               | 18.2 | 45.5 | 36.4 | 0.0 | 2.3                                   | 22.0 | 51.6 | 24.1 | 0.0 |
| Orlando CSA                             | 21.6                           | 41                 | 26.1                           | 2.4                                               | 24.4 | 41.5 | 31.7 | 0.0 | 2.5                                   | 26.4 | 42.6 | 26.6 | 0.6 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for two branches in middle- or upper-income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 78 ATMs in the AA, of which 42 were deposit-taking.

| 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 |
| Tampa MSA                                 | 3                    | 6                    | 0                                           | 0   | -2  | -1  | 0  |
| Cape Coral CSA                            | 6                    | 6                    | 0                                           | 0   | 1   | -1  | 0  |
| Jacksonville MSA                          | 1                    | 1                    | 0                                           | 0   | -1  | 1   | 0  |
| Miami MSA                                 | 2                    | 0                    | 0                                           | 0   | 1   | 1   | 0  |
| North Port CSA                            | 7                    | 3                    | -1                                          | 1   | 2   | 2   | 0  |
| Orlando CSA                               | 2                    | 5                    | 0                                           | -1  | -2  | 0   | 0  |

\* The tables present 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. In the Tampa MSA AA, the bank opened three branches and closed six branches, all in middle- and upper income geographies. The branch closures were short distance consolidations due to reduction in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch

hours were the same for branches in low- and moderate-income geographies compared to those in middle- and upper income geographies.

## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 189 qualified CD service activities to 89 organizations logging 3,988 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 97 of these activities with employees providing 1,959 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

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

- An employee of the bank served as board chair of a CDC. The employee provided 762 hours of service.
- Bank staff provided 69 financial education programs, which included eight YBC sessions to 225 students.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Miami MSA and Orlando CSA was consistent with the bank's overall performance under the Service Test in the full-scope area. Based on limited-scope reviews, the bank's performance under the Service Test in the Cape Coral CSA, Jacksonville MSA and North Port CSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas lowered the overall Service Test rating.

## State of Georgia

**CRA rating for the State of Georgia:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good and the overall distribution of loans by borrower income and businesses of different sizes was adequate.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- FTB's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Georgia

FTB delineated two AAs in Georgia. They include a portion of the Atlanta-Sandy Springs-Alpharetta, GA (Atlanta) MSA and a portion of the Augusta-Richmond County, GA-SC (Augusta) MSA. Refer to appendix A for a complete list of the counties reviewed.

Georgia was FTB's 10<sup>th</sup> largest rating area based on total deposits. The bank had \$3.8 billion in deposits in the combined areas, which represented 1.7 percent of the bank's total deposits. The combined areas were served by 73 FDIC-insured banks operating 848 branches. FTB ranked 13<sup>th</sup> in deposit market share with 1.3 percent. The top three banks and their market share were Truist Bank (26.2 percent), Bank of America, N.A. (21.6 percent), and Wells Fargo Bank, N.A. (18.6 percent). FTB had 32 branches and 99 ATMs within the combined areas. During the evaluation period, the bank made \$1.7 billion or 2.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Atlanta MSA

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

**Table A – Demographic Information of the Assessment Area****Assessment Area: Atlanta MSA**

| Demographic Characteristics                                                                                                                                                               | #         | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|------------------------------|------------------|-----------------|---------------|
| Geographies (Census Tracts)                                                                                                                                                               | 642       | 13.1          | 23.2                         | 23.5             | 39.1            | 1.1           |
| Population by Geography                                                                                                                                                                   | 3,561,038 | 9.4           | 23.0                         | 27.3             | 39.9            | 0.4           |
| Housing Units by Geography                                                                                                                                                                | 1,439,831 | 10.5          | 23.7                         | 25.8             | 39.7            | 0.2           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 772,644   | 4.2           | 17.3                         | 28.8             | 49.7            | 0.0           |
| Occupied Rental Units by Geography                                                                                                                                                        | 509,304   | 17.4          | 31.6                         | 22.4             | 28.2            | 0.4           |
| Vacant Units by Geography                                                                                                                                                                 | 157,883   | 19.3          | 30.2                         | 22.2             | 28.1            | 0.2           |
| Businesses by Geography                                                                                                                                                                   | 752,962   | 7.0           | 21.3                         | 25.6             | 45.6            | 0.5           |
| Farms by Geography                                                                                                                                                                        | 10,261    | 5.8           | 20.8                         | 31.1             | 42.0            | 0.1           |
| Family Distribution by Income Level                                                                                                                                                       | 831,086   | 22.2          | 15.7                         | 16.8             | 45.4            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 1,281,948 | 23.2          | 15.8                         | 16.8             | 44.2            | 0.0           |
| Median Family Income MSA - 12060<br>Atlanta-Sandy Springs-Alpharetta, GA MSA                                                                                                              |           | \$67,322      | Median Housing Value         |                  |                 | \$208,576     |
|                                                                                                                                                                                           |           |               | Median Gross Rent            |                  |                 | \$1,029       |
|                                                                                                                                                                                           |           |               | Families Below Poverty Level |                  |                 | 11.6%         |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |           |               |                              |                  |                 |               |

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,661 and moderate-income families earned less than \$53,858. The median housing value in the AA is \$208,576. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$842 for a low-income borrower and \$1,346 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,043. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.6 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, the Atlanta economy is recovering vigorously from the recession at a rate superior to that of the nation. Payrolls are growing at an above average rate and jobs recovery relative to the pre-pandemic peak is outperforming most of Atlanta's peers among the nation's 25 largest metro areas. The recovery is fueled by gains in logistics and professional and business services. Longer-term strengths include having a diverse economy, being a distribution center, business friendliness, and good net in-migration. Longer-

term weaknesses include over-priced housing and strained infrastructure. Housing prices are rising rapidly and are over-valued. Housing permits are increasing. Professional and business services, education and health services, government, and retail trade are important economic drivers. The largest employers are Delta Air Lines, Emory University/Emory Healthcare, The Home Depot, Northside Hospital, and Piedmont Healthcare.

The unemployment rate was 5.2 percent as of January 2017. Unemployment levels significantly increased from 3.7 percent in March 2020 to 12.6 percent in April 2020 due to the impacts of COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Atlanta MSA was 2.3 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC reviewed information from three community contacts made during the evaluation period to better understand area credit and community needs. All three contacts worked in economic and CD organizations. The contacts raised a wide range of needs in each interview. However, the contacts consistently outlined the importance of CD services and their positive impact in the MSA. Contacts also described how CD services could have the greatest impact in the metro area by focusing activities on communities located south of the Interstate 20 corridor. The greatest needs in the MSA are:

- Financial literacy classes for both individuals and small business owners.
- Accounting classes for small business owners.
- Technical assistance for small businesses in establishing effective financial management practices.
- Small business credit, including micro-loans generally under \$100,000.
- Affordable housing; and
- Workforce development training.

## **Scope of Evaluation in Georgia**

The Atlanta MSA received a full-scope review. This area accounted for over 90 percent of the deposits and nearly 95 percent of the lending in the state during the evaluation period. The Augusta MSA received a limited-scope review. FTB did not originate or purchase enough small loans to farms in the state of Georgia to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Atlanta MSA was good. Performance in the limited-scope area supported the overall Lending Test rating.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans*</b> |               |                |            |                       |       |                |                  |
|-------------------------|---------------|----------------|------------|-----------------------|-------|----------------|------------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total | % State* Loans | % State Deposits |
| Atlanta MSA             | 4,559         | 1,879          | 1          | 29                    | 6,468 | 94.5           | 90.3             |
| Augusta MSA             | 281           | 96             | 0          | 1                     | 378   | 5.5            | 9.7              |
| Total                   | 4,840         | 1,975          | 1          | 30                    | 6,846 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |               |                |            |                       |           |                |                  |
|-----------------------------------------|---------------|----------------|------------|-----------------------|-----------|----------------|------------------|
| Assessment Area                         | Home Mortgage | Small Business | Small Farm | Community Development | Total     | % State* Loans | % State Deposits |
| Atlanta MSA                             | 1,381,376     | 236,363        | 9          | 153,964               | 1,771,712 | 97.2           | 90.3             |
| Augusta MSA                             | 38,292        | 8,462          | 0          | 3,496                 | 50,250    | 2.8            | 9.7              |
| Total                                   | 1,419,667     | 244,825        | 9          | 157,460               | 1,821,961 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 1.1 percent and ranked 15<sup>th</sup> among 81 FDIC-insured banks, which placed it in the top 19 percent of banks.

The bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased and ranked 31<sup>st</sup> of 883 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 16.6 percent were Rocket Mortgage (9 percent), United Wholesale Mortgage (3.9 percent), and Truist Bank (3.7 percent).

The bank had a market share of 0.5 percent based on the number of small loans to businesses originated or purchased and ranked 25<sup>th</sup> of 296 small business lenders, which placed it in the top 9 percent of lenders. The top three lenders with a combined market share of 43.2 percent were American Express National Bank (18.4 percent), Bank of America, N.A. (13.4 percent), and Wells Fargo Bank, N.A. (11.4 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of Georgia 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied homes in low-income geographies and equaled the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies but equaled the aggregate distribution of loans by all lenders.



### ***Small Loans to Businesses***

Refer to Table Q in the state of Georgia 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but approximated the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout 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 of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

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 by all lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but was near to the aggregate distribution of loans by all lenders.

The cost of housing and the poverty level of the AA limited opportunities for home mortgage lending, particularly to low-income families.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 12 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 the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Georgia.

The Lending Activity Tables, shown above, set forth 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 29 CD loans totaling nearly \$154 million, which represented 61.7 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 52.2 percent funded economic development, 39.9 percent of these loans funded affordable housing, 6.2 percent funded revitalization and stabilization efforts, and 1.6 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$42.5 million loan to construct a 238-unit senior housing facility in Stonecrest. The units are income restricted to 30 to 80 percent of the AMI. The project is backed by revenue bonds issued by the city's public housing authority.
- \$12 million loan to construct a 78-unit LIHTC senior housing complex in Kennesaw, GA. Fifty-eight of the units are income restricted to 50 and 60 percent of AMI, with the remaining 20 units at market rate.
- \$3.6 million PPP loan to a distribution warehouse located in a moderate-income geography in Atlanta. The loan allowed the company to meet critical business needs during the COVID-19 pandemic.

## **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, the bank originated or purchased 151 loans under flexible lending programs totaling \$34.2 million. Program volumes include one 53 Community Mortgage loan totaling \$175,000, 110 FHA loans totaling \$24.2 million, 16 Freddie Mac HP loans totaling \$3.6 million, four Fannie Mae HR loans totaling \$760,000, and 20 VA loans totaling \$5.5 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Augusta MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope areas supported the overall Lending Test rating.

Refer to Tables O through T in the state of Georgia section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Georgia is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the institution's performance in Georgia is excellent.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |                |          |                |          |       |              |          |               |                         |          |
|------------------------|----------------|----------|----------------|----------|-------|--------------|----------|---------------|-------------------------|----------|
| Assessment Area        | Prior Period** |          | Current Period |          | Total |              |          |               | Unfunded Commitments*** |          |
|                        | #              | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                       | \$(000s) |
| Atlanta MSA            | 4              | 17,262   | 173            | 33,204   | 177   | 85.1         | 50,466   | 91.3          | 1                       | 193      |
| Augusta MSA            | 2              | 4,706    | 29             | 116      | 31    | 14.9         | 4,822    | 8.7           | 1                       | 546      |
| Total                  | 6              | 21,968   | 202            | 33,320   | 208   | 100          | 55,288   | 100           | 2                       | 739      |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 173 investments totaling \$33.2 million during the evaluation period to approximately 107 organizations/projects. The dollar volume of current and prior period investments represented 20.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 92.3 percent of investments supported affordable housing, 4.5 percent supported economic development, 2.8 percent funded community services to low- and moderate income- individuals, and 0.4 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$18.1 million investment in a 354-unit LIHTC development with all units subsidized through a HUD Section 8 rental subsidy contract.
- \$1 million investment to a CDFI loan fund serving low-income communities within the Atlanta metro area. The fund provides loans to small businesses, primarily minority- and women-owned, that would not qualify for traditional bank financing.
- \$300,000 to a nonprofit organization that provides credit and money management, homeownership counseling, and small business programs to low- and moderate-income individuals and communities.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Augusta MSA is consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope area supported the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Georgia is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta MSA is excellent.

## Retail Banking Services

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Atlanta MSA                             | 90.3                           | 30                 | 93.8                           | 10.0                                              | 20.0 | 26.7 | 43.3 | 0.0 | 13.1                                  | 23.2 | 23.5 | 39.1 | 1.1 |
| Augusta MSA                             | 9.7                            | 2                  | 6.2                            | 0.0                                               | 50.0 | 0.0  | 50.0 | 0.0 | 16.4                                  | 22.4 | 34.3 | 26.9 | 0.0 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low- and moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for three branches in middle- or upper-income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 97 ATMs in the AA, of which 37 were deposit-taking.

| 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 |
| Atlanta MSA                               | 6                    | 4                    | 1                                           | 2   | 0   | -2  | 1  |
| Augusta MSA                               | 0                    | 1                    | 0                                           | 0   | 0   | -1  | 0  |

\* The tables present 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 improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened six branches, one of which was in a low-income geography and

two in moderate-income geographies. The bank closed four branches, all in middle- and upper income geographies. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Average hours for branches in low- and moderate-income geographies were comparable to those in middle- and upper income branches.

## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 181 qualified CD service activities to over 80 organizations logging 3,009 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 53 of these activities with 12 employees providing 1,218 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

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

- An employee of the bank served on the board of a youth advocacy organization serving low- and moderate-income students in the metro Atlanta area. The employee provided 80 hours of service.
- Bank staff provided 85 financial education programs, which included five YBC sessions to nearly 150 students.

## **Conclusions for the Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Augusta MSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

## State of Illinois

**CRA rating for the State of Illinois<sup>7</sup>:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Needs to Improve

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was poor, and overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Illinois

FTB delineated three AAs in Illinois. They include a portion of the Carbondale-Marion, IL (Carbondale) MSA, a portion of the Rockford, IL (Rockford) MSA, and three Non-MSA (IL Non-MSA) counties within the state. The three Non-MSA counties were combined as one AA for analysis and presentation. The state rating does not include the counties in the Chicago CSA that were reviewed as part of the MMSA ratings. Refer to appendix A for a complete list of the counties reviewed.

Illinois was FTB's 15<sup>th</sup> largest rating area based on total deposits. The bank had approximately \$512 million in deposits in the combined areas, which represented 0.3 percent of total deposits. The combined areas were served by 61 FDIC-insured banks operating 195 branches. The top three banks and their deposit market shares were Midland States Bank (11.4 percent), Illinois Bank and Trust (8.1 percent) and JPMorgan Chase Bank, N.A. (6.5 percent). FTB had seven branches and 10 ATMs. During the evaluation period, the bank originated \$119.1 million or 0.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

The following table provides a summary of the demographics, including housing, business, and economic information for the IL Non-MSA AA.

---

<sup>7</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## Illinois Non-MSA

| Table A – Demographic Information of the Assessment Area                                                                                                                                  |         |               |                              |                  |                 |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: IL Non-MSA                                                                                                                                                               |         |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                               | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                               | 37      | 2.7           | 16.2                         | 59.5             | 21.6            | 0.0           |
| Population by Geography                                                                                                                                                                   | 130,435 | 1.3           | 13.0                         | 61.6             | 24.1            | 0.0           |
| Housing Units by Geography                                                                                                                                                                | 57,350  | 1.4           | 14.0                         | 60.7             | 23.9            | 0.0           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 39,423  | 0.5           | 12.8                         | 60.7             | 26.1            | 0.0           |
| Occupied Rental Units by Geography                                                                                                                                                        | 12,732  | 3.1           | 16.6                         | 62.0             | 18.3            | 0.0           |
| Vacant Units by Geography                                                                                                                                                                 | 5,195   | 3.8           | 16.8                         | 57.9             | 21.4            | 0.0           |
| Businesses by Geography                                                                                                                                                                   | 8,807   | 4.4           | 9.6                          | 56.1             | 29.8            | 0.0           |
| Farms by Geography                                                                                                                                                                        | 721     | 0.4           | 3.5                          | 63.7             | 32.5            | 0.0           |
| Family Distribution by Income Level                                                                                                                                                       | 34,095  | 18.4          | 18.4                         | 22.5             | 40.7            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 52,155  | 22.4          | 16.5                         | 18.0             | 43.1            | 0.0           |
| Median Family Income Non-MSAs - IL                                                                                                                                                        |         | \$59,323      | Median Housing Value         |                  |                 | \$105,538     |
|                                                                                                                                                                                           |         |               | Median Gross Rent            |                  |                 | \$605         |
|                                                                                                                                                                                           |         |               | Families Below Poverty Level |                  |                 | 9.2%          |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |         |               |                              |                  |                 |               |

According to Moody’s Analytics, Illinois’ economy is gaining momentum, leading the region, and slightly edging out the U.S. in job growth. Manufacturing employment is slowly increasing. Inflation and wage pressures are in line with those nationally, although there is some variation across economies. Supply-chain stresses are having the biggest impact in areas with a high concentration of manufacturing, exports, or both. Factories will keep running at full capacity, limited only by labor and logistical challenges. The recent “Beige Book” report indicated that business is at or above pre-pandemic levels. Fabricated metal products and heavy machinery, which are important to the state, are in high demand.

Unprecedented federal support to the economy increased tax collections, and Illinois has more money to put to work than it has had in many years. The state promptly repaid a Federal Reserve loan, is reducing its backlog of unpaid bills, and has a budget surplus. These developments helped Illinois draw upgrades to its credit rating from multiple ratings agencies. Government spending is expected to rebound aggressively in the next couple of years as federal stimulus and infrastructure funds flow to states and cities. The windfall is earmarked for patching budget holes and one-time projects; there will not be a significant bump in government jobs.

## Scope of Evaluation in Illinois

The IL Non-MSA AA received a full-scope review. This area accounted for nearly 50 percent of the deposits and 47 percent of the lending in the state during the evaluation period. The Carbondale MSA and Rockford CSA AAs received limited-scope reviews. FTB did not originate or purchase enough small loans to farms in the limited scope areas of the state of Illinois to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Illinois Non-MSA is good. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* |               |                |            |                       |       |                |                  |
|------------------|---------------|----------------|------------|-----------------------|-------|----------------|------------------|
| Assessment Area  | Home Mortgage | Small Business | Small Farm | Community Development | Total | % State* Loans | % State Deposits |
| IL Non-MSA       | 422           | 138            | 27         | 7                     | 594   | 47.0           | 49.8             |
| Carbondale MSA   | 138           | 16             | 2          | 0                     | 156   | 12.4           | 36.4             |
| Rockford CSA     | 331           | 179            | 0          | 3                     | 513   | 40.6           | 13.8             |
| Total            | 891           | 333            | 29         | 10                    | 1,263 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| Dollar Volume of Loans* (\$000s) |               |                |            |                       |         |                |                  |
|----------------------------------|---------------|----------------|------------|-----------------------|---------|----------------|------------------|
| Assessment Area                  | Home Mortgage | Small Business | Small Farm | Community Development | Total   | % State* Loans | % State Deposits |
| IL Non-MSA                       | 38,817        | 16,094         | 1,570      | 39,409                | 95,890  | 56.0           | 49.8             |
| Carbondale MSA                   | 12,553        | 3,094          | 24         | 0                     | 15,671  | 9.2            | 36.4             |
| Rockford CSA                     | 29,449        | 17,450         | 0          | 12,739                | 59,638  | 34.8           | 13.8             |
| Total                            | 80,818        | 36,638         | 1,594      | 52,148                | 171,199 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 5.1 percent and ranked seventh among 30 FDIC-insured banks, which placed it in the top 24 percent of banks.

The bank had a market share of 3.3 percent based on the number of home mortgage loans originated or purchased and ranked eighth among 233 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 24.3 percent were U.S. Bank, N.A. (9.7 percent), Dieterich Bank (8.1 percent), and Rocket Mortgage (6.5 percent).

The bank had a market share of 2.8 percent based on the number of small loans to businesses originated or purchased and ranked 10<sup>th</sup> out of 73 small business lenders, which placed it in the top 14 percent of lenders. The top three lenders with a combined market share of 33.6 percent were Midland States Bank (12.1 percent), First Mid Bank and Trust, N.A. (12 percent), and American Express National Bank (9.4 percent).

The bank had a market share of 1.3 percent based on the number of small loans to farms originated or purchased and ranked 11<sup>th</sup> out of 20 small farm lenders, which placed it in the top 55 percent of lenders. The top three



lenders with a combined market share of 55.9 percent were John Deere Financial, F.S.B. (22.5 percent), First Mid Bank and Trust, NA (20.3 percent), and Banterra Bank (13.1 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited a poor geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of Illinois Non-MSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was significantly below both the percentage of owner-occupied homes in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Illinois Non-MSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Illinois Non-MSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank made no small loans to farms in low- or moderate-income geographies.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

#### ***Home Mortgage Loans***

Refer to Table P in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table R in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 15.9 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

#### ***Small Loans to Farms***

Refer to Table T in the state of Illinois Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 40.7 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 the percentage of farms with gross annual revenues of \$1 million or less but was near the aggregate distributions of small loans to farms by all lenders.

## Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Illinois.

The Lending Activity Tables, shown above, set forth 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 seven CD loans totaling nearly \$39.4 million, which represented 156.1 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 92.4 percent funded economic development and 7.6 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$15.7 million loan to an employee-owned manufacturer and rebuilder of railroad equipment located in a moderate-income geography in Mount Vernon, IL. The loan assisted in creating and retaining jobs for low- and moderate-income individuals.
- \$1.5 million loan (and renewed during the evaluation period) to a nonprofit organization that provides community services including group housing and job training to low- and moderate-income persons with disabilities.

## Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 36 loans under flexible lending programs specific to the AA totaling \$4.5 million. Program volumes include 17 FHA loans totaling \$2.1 million, two Freddie Mac HP loans totaling \$137,000, two Fannie Mae HR loans totaling \$161,000, four USDA/RA loans totaling \$388,000, and 11 VA loans totaling \$1.7 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Carbondale MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the Rockford MSA was stronger than the bank's overall performance under the Lending Test in the full-scope area due to better geographic distributions. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O to T in the state of Illinois section in appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Illinois is rated Needs to Improve.

Based on a full-scope review, FTB's performance in Illinois was poor.

### Number and Amount of Qualified Investments

The institution has a poor level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |                |          |                |          |       |              |          |               |                         |          |
|------------------------|----------------|----------|----------------|----------|-------|--------------|----------|---------------|-------------------------|----------|
| Assessment Area        | Prior Period** |          | Current Period |          | Total |              |          |               | Unfunded Commitments*** |          |
|                        | #              | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                       | \$(000s) |
| Il Non-MSA             | 1              | 85       | 24             | 39       | 25    | 47.1         | 124      | 27.7          | 0                       | 0        |
| Carbondale MSA         | 1              | 58       | 7              | 6        | 8     | 15.1         | 64       | 14.3          | 0                       | 0        |
| Rockford, IL MSA       | 2              | 62       | 18             | 197      | 20    | 37.8         | 259      | 57.9          | 2                       | 4        |
| Total                  | 4              | 205      | 49             | 242      | 53    | 100.0        | 447      | 100.0         | 2                       | 4        |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 24 investments totaling \$39,000 during the evaluation period to approximately eight organizations. The dollar volume of current and prior period investments represented 0.5 percent of allocated tier 1 capital. There are extremely limited opportunities to finance affordable housing within this AA. Per the Illinois Housing Development Authority, between 2017 to 2019, only one LIHTC was awarded in the bank's AA.

The institution exhibited poor responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for economic development and community services to low- and moderate-income individuals. By dollar volume, 65 percent supported economic development and 35 percent funded community services to low- and moderate-income individuals. The institution did not use innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- \$1,500 donation to a nonprofit agency that develops, implements, and evaluates social services programs to assist economically and socially disadvantaged individuals, including homeless services, foreclosure prevention, and homebuyer/owner education.
- \$1,500 donation to a foundation that provides healthcare to the underserved in the Sauk Valley. The foundation offers transportation assistance program, pediatric mental health services, and a medication assistance program.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Carbondale MSA and Rockford, IL MSA AAs was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Illinois is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the IL Non-MSA was excellent. Performance in the limited-scope areas lowered the Service Test rating in Illinois.

### Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |       |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|-------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| IL Non-MSA                             | 49.8                           | 3                  | 42.9                           | 0.0                                               | 33.3 | 33.3  | 33.3 | 0.0 | 1.3                                   | 13.0 | 61.6 | 24.1 | 0.0 |
| Carbondale MSA                         | 13.8                           | 1                  | 14.3                           | 0.0                                               | 0.0  | 100.0 | 0.0  | 0.0 | 0.0                                   | 20.0 | 53.3 | 26.7 | 0.0 |
| Rockford CSA                           | 36.4                           | 3                  | 42.9                           | 0.0                                               | 33.3 | 33.3  | 33.3 | 0.0 | 15.6                                  | 23.3 | 32.2 | 26.7 | 2.2 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. Although the bank did not have any branches in low-income geographies, a low percentage of the AA population lives in those geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had three deposit-taking ATMs in the AA.

| 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 |
| IL Non-MSA                                | 0                    | 1                    | 0                                           | 0   | -1  | 0   | 0  |
| Carbondale MSA                            | 0                    | 0                    | 0                                           | 0   | 0   | 0   | 0  |
| Rockford CSA                              | 0                    | 1                    | -1                                          | 0   | 0   | 0   | 0  |

\* The tables present 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. The bank closed one branch, which was in a middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of

branches in low- and moderate-income geographies exceeded the hours of branches in middle- and upper income geographies.

## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 29 qualified CD service activities to 10 organizations logging 755 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 24 of these activities with six employees providing 538 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

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

- An employee served on a board committee of a community foundation that provides grants to CD organizations throughout the AA. The employee provided 200 hours of service.
- A bank employee served on the board of an economic development organization and provided 130 hours of service.
- Bank employees provided five financial and technical assistance sessions.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Carbondale MSA was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the Rockford CSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to poorer branch distributions. Performance in the limited-scope areas lowered the overall Service Test rating.

## State of Indiana

### **CRA rating for the State of Indiana<sup>8</sup>: Outstanding**

**The Lending Test is rated: Outstanding**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good and the overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- FTB's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

### **Description of Institution's Operations in Indiana**

FTB delineated six AAs in the state of Indiana. They included portions of the Bloomington, IN (Bloomington) MSA, Fort Wayne-Huntington-Auburn, IN (Fort Wayne) CSA, Indianapolis-Carmel-Anderson, IN (Indianapolis) MSA, Lafayette-West Lafayette-Frankfort, IN (Lafayette) MSA, Terre-Haute MSA, and nine Non-MSA (IN Non-MSA) counties. The Non-MSA counties were combined as one AA for analysis and presentation. The state of Indiana rating does not include the counties included in the Chicago CSA, Cincinnati CSA, Evansville MMSA, Louisville MMSA, or South Bend CSA AA that were included in the MMSA analyses. Refer to the table in appendix A for a list of counties reviewed.

Indiana was FTB's sixth largest rating area based on total deposits. FTB had \$8.9 billion in deposits in the combined AAs, which represented 5.3 percent of its total deposits. There were 79 FDIC-insured banks operating 789 branch offices in the combined areas. FTB ranked third with 8.9 percent deposit market share. The top two banks and their market share ahead of FTB were JPMorgan Chase Bank, N.A. (19.8 percent) and PNC Bank N.A. (10.8 percent). FTB operated 69 branches and 104 ATMs. During the evaluation period, the bank originated nearly \$3.5 billion or 5.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### **Indianapolis CSA**

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

---

<sup>8</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

**Table A – Demographic Information of the Assessment Area****Assessment Area: Indianapolis CSA**

| <b>Demographic Characteristics</b>                                    | <b>#</b>  | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
|-----------------------------------------------------------------------|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                           | 364       | 16.8                  | 26.6                         | 30.5                     | 25.8                    | 0.3                   |
| Population by Geography                                               | 1,827,961 | 10.9                  | 22.1                         | 31.5                     | 35.3                    | 0.1                   |
| Housing Units by Geography                                            | 777,470   | 12.4                  | 24.0                         | 30.7                     | 32.7                    | 0.2                   |
| Owner-Occupied Units by Geography                                     | 449,779   | 6.2                   | 16.5                         | 35.0                     | 42.3                    | 0.1                   |
| Occupied Rental Units by Geography                                    | 245,783   | 19.3                  | 35.3                         | 25.3                     | 19.8                    | 0.2                   |
| Vacant Units by Geography                                             | 81,908    | 25.8                  | 31.3                         | 23.9                     | 18.6                    | 0.4                   |
| Businesses by Geography                                               | 220,160   | 10.9                  | 20.8                         | 29.7                     | 38.5                    | 0.1                   |
| Farms by Geography                                                    | 6,082     | 6.1                   | 14.7                         | 40.2                     | 38.9                    | 0.1                   |
| Family Distribution by Income Level                                   | 451,047   | 21.8                  | 17.0                         | 19.5                     | 41.8                    | 0.0                   |
| Household Distribution by Income Level                                | 695,562   | 23.5                  | 16.3                         | 17.7                     | 42.6                    | 0.0                   |
| Median Family Income MSA - 18020 Columbus, IN MSA                     |           | \$66,425              | Median Housing Value         |                          |                         | \$145,644             |
| Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA |           | \$66,803              | Median Gross Rent            |                          |                         | \$834                 |
| Median Family Income Non-MSAs - IN                                    |           | \$55,715              | Families Below Poverty Level |                          |                         | 10.7%                 |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,402 and moderate-income families earned less than \$53,442. The median housing value in the AA is \$145,644. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$835 for a low-income borrower and \$1,336 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$771.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.7 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, the Indianapolis economy benefits from manufacturing that has rebounded above its pre-pandemic high, a diversified industrial structure and distribution network, and a growing pharmaceutical industry. These business sectors are supported by strong migration trends into the metro area and a low cost of doing business. Warehousing and transportation companies continue to invest in the metro area given its central location in the United States for movement of freight. Amazon, Bastian, and FedEx are all



upgrading facilities. Items presenting potential headwinds for the Indianapolis economy include rising housing prices and higher than average exposure to the public sector because of state government employment. Top employers include Indiana University Health, St. Vincent Hospitals & Health Services, Community Health Network, Eli Lilly and Company, and Walmart.

The unemployment rate for the Indianapolis CSA was 4.1 percent as of January 2017. Unemployment levels significantly increased from 3.3 percent in March 2020 to 12.8 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined and the unemployment rate for the Indianapolis CSA was 1.2 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC reviewed two recently completed community contacts within the Indianapolis CSA to better understand area credit and community needs. One contact worked for an economic development organization while the other worked for a CDFI. Contacts expressed a wide range of needs in the MSA and described how COVID-19 had an impact on the MSA. The greatest needs in the MSA include:

- Affordable housing throughout the metro area, including in northern suburbs.
- Investments in Indianapolis Public School District schools.
- Social service programs that benefit low- and moderate-income individuals.
- Financial literacy classes.
- Childcare and afterschool programs for low- and moderate-income children.
- Workforce development programs.
- Micro-loans between \$5,000 and \$15,000 to entrepreneurs and small businesses.
- Access to no balance and no- or low-fee checking accounts.

## **Scope of Evaluation in Indiana**

The Indianapolis CSA AA received a full-scope review. This area accounted for 78 percent of the state deposits and 62 percent of the lending in the state during the evaluation period. The remaining AA received a limited-scope review. FTB originated or purchased enough small loans to farms only in the Indianapolis CSA and the Indiana non-MSA AAs to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Indianapolis CSA was excellent. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans*</b> |               |                |            |                       |        |                |                  |
|-------------------------|---------------|----------------|------------|-----------------------|--------|----------------|------------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total  | % State* Loans | % State Deposits |
| Indianapolis CSA        | 11,997        | 3,638          | 36         | 67                    | 15,738 | 62.4           | 78.4             |
| Bloomington MSA         | 575           | 187            | 2          | 0                     | 764    | 3.0            | 2.3              |
| Fort Wayne CSA          | 3,277         | 448            | 3          | 5                     | 3,733  | 14.8           | 4.8              |
| Lafayette MSA           | 355           | 99             | 0          | 2                     | 456    | 1.8            | 1.6              |
| Terre Haute MSA         | 1,499         | 218            | 18         | 5                     | 1,740  | 6.9            | 3.2              |
| IN Non-MSA              | 2,350         | 417            | 31         | 2                     | 2,800  | 11.1           | 9.7              |
| Total                   | 20,053        | 5,007          | 90         | 81                    | 25,231 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |               |                |            |                       |           |                |                  |
|-----------------------------------------|---------------|----------------|------------|-----------------------|-----------|----------------|------------------|
| Assessment Area                         | Home Mortgage | Small Business | Small Farm | Community Development | Total     | % State* Loans | % State Deposits |
| Indianapolis CSA                        | 1,962,265     | 399,409        | 1,390      | 129,730               | 2,492,794 | 67.6           | 78.4             |
| Bloomington MSA                         | 91,097        | 17,076         | 40         | 0                     | 108,213   | 2.9            | 2.3              |
| Fort Wayne CSA                          | 501,850       | 36,252         | 48         | 20,112                | 558,262   | 15.1           | 4.8              |
| Lafayette MSA                           | 47,992        | 7,407          | 0          | 10,014                | 65,413    | 1.8            | 1.6              |
| Terre Haute MSA                         | 122,883       | 12,152         | 458        | 47,594                | 183,087   | 5.0            | 3.2              |
| IN Non-MSA                              | 236,129       | 36,336         | 1,445      | 3,874                 | 277,784   | 7.5            | 9.7              |
| Total                                   | 2,962,215     | 508,632        | 3,381      | 211,324               | 3,685,552 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 9.3 percent and ranked third among 44 FDIC-insured banks, which placed it in the top 7 percent of banks.

The bank had a market share of 2.5 percent based on the number of home mortgage loans originated or purchased and ranked 10<sup>th</sup> among 680 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 14.7 percent were Caliber Home Loans, Inc. (5.5 percent), Rocket Mortgage (5.4 percent), and JPMorgan Chase Bank, N.A. (3.7 percent).

The bank had a market share of 3.5 percent based on the number of small loans to businesses originated or purchased and ranked 7<sup>th</sup> out of 217 small business lenders, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 31.6 percent were JPMorgan Chase Bank, N.A. (14 percent), American Express National Bank (10.6 percent), and PNC Bank N.A. (7 percent).

Small loans to farms market share is based on 2020 peer lending data, which was the most recent information available at the time of the evaluation. The bank had no market share because FTB did not originate or purchase any small loans to farms in calendar year 2020.

## Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic

information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of Indiana 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was near the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Indiana 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in low-income geographies and was below the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income was below the percentage of businesses in moderate-income geographies and approximated the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Indiana 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11.6 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 22.2 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 below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Indiana.

The Lending Activity Tables, shown above, set forth 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 67 CD loans totaling nearly \$289.5 million, which represented 41.8 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 22.3 percent of these loans funded affordable housing, 44.8 percent funded economic development, 29 percent funded revitalization and stabilization efforts, and 3.9 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$55 million loan that supported the revitalization of a neighborhood through the redevelopment of a divested manufacturing site in a low- and moderate-income community. The loan was made to a municipal corporation that issues bonds and notes to various qualified entities in the city of Indianapolis and Marion County.
- \$6.5 million construction loan to support a 61-unit LIHTC project that will include 15 units set aside for homeless veterans. The remaining units are income restricted to persons earning between 30 and 80 percent of the AMI. The project used multiple layers of financing including payment in lieu of taxes, tax credits, and equity investment.
- \$3.2 million PPP loan to an employee-owned plastic manufacturing plant located in a moderate-income geography to support operations during the COVID-19 pandemic.

## **Product Innovation and Flexibility**

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 951 loans under flexible lending programs specific to the AA totaling \$138.3 million. Program volumes included, 32 53 Community Mortgage loans totaling \$4.4 million, 481 FHA loans totaling \$70.2 million, 225 Freddie Mac HP loans totaling \$29.4 million, 67 Fannie Mae HR loans totaling \$9 million, two Fannie Mae RN loans totaling \$188,000, 18 USDA/RA loans totaling \$1.7 million, and 126 VA loans totaling \$23.5 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lafayette MSA, Terre Haute MSA, and IN Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the Bloomington MSA and Fort Wayne CSA was weaker than the bank's overall performance under the Lending Test in the full-scope area because of weaker geographic distribution of loans and/or lower volume of CD lending. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O to T in the state of Indiana in appendix D for the facts and data supporting these conclusions.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in Indiana is rated Outstanding. Performance in the limited-scope areas supported the overall Investment Test rating.

Based on a full-scope review, the institution's performance in Indiana was excellent.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |                |          |                |          |       |              |          |               |                         |          |
|------------------------|----------------|----------|----------------|----------|-------|--------------|----------|---------------|-------------------------|----------|
| Assessment Area        | Prior Period** |          | Current Period |          | Total |              |          |               | Unfunded Commitments*** |          |
|                        | #              | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                       | \$(000s) |
| Indianapolis CSA       | 31             | 18,520   | 249            | 52,879   | 280   | 59.7         | 71,399   | 54.3          | 28                      | 1,565    |
| Bloomington MSA        | 3              | 2,523    | 27             | 4,850    | 30    | 6.4          | 7,373    | 5.6           | 3                       | 536      |
| Fort Wayne CSA         | 8              | 3,284    | 38             | 6,584    | 46    | 9.8          | 9,868    | 7.5           | 6                       | 258      |
| Lafayette MSA          | 1              | 2,452    | 18             | 8,428    | 19    | 4.1          | 10,880   | 8.3           | 1                       | 759      |
| Terre-Haute MSA        | 3              | 1,057    | 31             | 11,238   | 34    | 7.2          | 12,295   | 9.4           | 3                       | 69       |
| In Non-MSA             | 7              | 5,894    | 53             | 13,701   | 60    | 12.8         | 19,595   | 14.9          | 6                       | 219      |
| Total                  | 53             | 33,730   | 416            | 97,680   | 469   | 100          | 131,410  | 100           | 47                      | 3,406    |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 249 investments during the evaluation period totaling \$52.9 million to over 150 organizations/projects. The dollar volume of current and prior period investments represented 10.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 79.9 percent of investments supported affordable housing, 16.5 percent supported economic development, 3.3 percent funded community services to low- and moderate-income individuals, and 0.3 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$10.5 million equity investment for the construction of a 61-unit affordable housing community supported with housing tax credits, with 15 units set aside for homeless veterans. The apartments are income restricted to residents who earn 30 to 80 percent of the AMI.
- \$9.6 million for a 60-unit affordable senior housing complex. All units are restricted to households earning at or below 60 percent of the AMI.
- \$4 million for a LIHTC project consisting of 51 units. Rent is capped at 30 percent of the AMI through HUD's rental assistance program.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MSA, Fort Wayne CSA, Lafayette MSA, Terre Haute MSA, and IN Non-MSA AAs was consistent with the bank's

overall performance in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Indiana is rated Outstanding.

Based on a full-scope review, the bank's performance in the Indianapolis CSA was excellent. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

## Conclusions for Area Receiving a Full-Scope Review

### Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Indianapolis CSA                       | 78.4                           | 43                 | 62.3                           | 11.6                                              | 32.6 | 23.3 | 32.6 | 0.0 | 10.9                                  | 22.1 | 31.5 | 35.3 | 0.1 |
| Bloomington MSA                        | 2.3                            | 3                  | 44.3                           | 0.0                                               | 33.3 | 33.3 | 33.3 | 0.0 | 9.7                                   | 18.5 | 34.8 | 32.4 | 4.6 |
| Fort Wayne CSA                         | 4.8                            | 8                  | 11.6                           | 12.5                                              | 12.5 | 62.5 | 12.5 | 0.0 | 8.9                                   | 16.3 | 48.0 | 26.1 | 0.6 |
| Lafayette MSA                          | 1.6                            | 2                  | 2.9                            | 50.0                                              | 0.0  | 0.0  | 50.0 | 0.0 | 6.1                                   | 18.7 | 31.0 | 35.1 | 9.2 |
| Terre Haute MSA                        | 3.2                            | 2                  | 7.2                            | 0.0                                               | 20.0 | 60.0 | 20.0 | 0.0 | 4.4                                   | 19.3 | 47.6 | 28.7 | 0.0 |
| IN Non-MSA                             | 9.7                            | 8                  | 11.6                           | 0.0                                               | 25.0 | 37.5 | 37.5 | 0.0 | 0.0                                   | 10.6 | 62.8 | 26.6 | 0.0 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 59 ATMs in the AA, of which 53 were deposit-taking.

| Distribution of Branch Openings/Closings* |                      |                      |                                                |     |     |     |    |
|-------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
| Branch Openings/Closings                  |                      |                      |                                                |     |     |     |    |
| Assessment Area                           | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|                                           |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| Indianapolis CSA                          | 2                    | 3                    | 0                                              | -1  | 1   | -1  | 0  |
| Bloomington MSA                           | 0                    | 0                    | 0                                              | 0   | 0   | 0   | 0  |
| Fort Wayne CSA                            | 1                    | 3                    | 0                                              | -1  | -1  | 0   | 0  |
| Lafayette MSA                             | 0                    | 2                    | 0                                              | -1  | -1  | 0   | 0  |
| Terre Haute MSA                           | 0                    | 3                    | 0                                              | 0   | -3  | 0   | 0  |
| IN Non-MSA                                | 0                    | 5                    | 0                                              | 0   | -4  | -1  | 0  |

\* The tables present 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 generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened two branches in middle- and upper income geographies. The bank closed three branches, one in a moderate-income geography and two in upper income geographies. The branch closures were short distance consolidations due to reductions in branch transaction volumes.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours at branches in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 169 qualified CD service activities to over 70 organizations logging 7,215 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 89 of these activities with 35 employees providing 3,827 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

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

- An employee served on the board of an organization that provides housing and financial assistance to victims of domestic violence. The employee provided 968 hours of service.
- Bank staff provided 47 financial education programs, including 14 YBC sessions to 600 students.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the IN Non-MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the Bloomington MSA, Fort Wayne CSA, Lafayette MSA, and Terre Haute MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.



## State of Kentucky

**CRA rating for the State of Kentucky<sup>9</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good, and the overall distribution of loans by borrower income and businesses of different sizes was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. FTB made a good level of qualified investments, grants, and donations.
- FTB's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Kentucky

FTB delineated three AAs in Kentucky. They include a portion of the Lexington-Fayette-Richmond-Frankfurt (Lexington) CSA, Owensboro MSA in its entirety, and two Non-MSA (KY Non-MSA) counties. The Non-MSA counties were combined into one AA for analysis and presentation. The state rating does not include the counties in the Charleston CSA, Cincinnati CSA, Evansville MMSA, and Louisville MMSA that were reviewed as part of the MMSA analyses. Refer to appendix A for a list of counties reviewed.

Kentucky was FTB's 12<sup>th</sup> largest rating area based on total deposits. The bank had nearly \$2.1 billion in deposits in the combined areas, which represented 1.2 percent of its deposits. The combined areas were served by 49 FDIC-insured banks operating 291 branches. FTB ranked third with 9.6 percent deposit market share. The top two banks and their market share were JPMorgan Chase Bank, N.A. (11.9 percent) and Central Bank and Trust Company (10 percent). FTB had 22 branches and 37 ATMs. During the evaluation period, the bank made \$974.9 million or 1.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Lexington CSA

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

---

<sup>9</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

**Table A – Demographic Information of the Assessment Area****Assessment Area: Lexington CSA**

| <b>Demographic Characteristics</b>                            | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
|---------------------------------------------------------------|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                   | 141      | 7.1                   | 21.3                         | 37.6                     | 34.0                    | 0.0                   |
| Population by Geography                                       | 564,441  | 6.4                   | 20.9                         | 37.5                     | 35.2                    | 0.0                   |
| Housing Units by Geography                                    | 245,710  | 6.6                   | 21.5                         | 37.9                     | 34.0                    | 0.0                   |
| Owner-Occupied Units by Geography                             | 129,987  | 3.3                   | 15.6                         | 37.5                     | 43.6                    | 0.0                   |
| Occupied Rental Units by Geography                            | 93,462   | 10.5                  | 29.1                         | 38.0                     | 22.5                    | 0.0                   |
| Vacant Units by Geography                                     | 22,261   | 9.1                   | 24.3                         | 39.7                     | 26.9                    | 0.0                   |
| Businesses by Geography                                       | 59,145   | 4.9                   | 17.7                         | 39.3                     | 38.1                    | 0.0                   |
| Farms by Geography                                            | 2,574    | 3.3                   | 12.5                         | 42.1                     | 42.1                    | 0.0                   |
| Family Distribution by Income Level                           | 138,304  | 22.0                  | 15.0                         | 18.7                     | 44.3                    | 0.0                   |
| Household Distribution by Income Level                        | 223,449  | 24.4                  | 14.7                         | 16.0                     | 45.0                    | 0.0                   |
| Median Family Income MSA - 30460<br>Lexington-Fayette, KY MSA |          | \$66,800              | Median Housing Value         |                          |                         | \$169,496             |
| Median Family Income Non-MSAs - KY                            |          | \$45,986              | Median Gross Rent            |                          |                         | \$752                 |
|                                                               |          |                       | Families Below Poverty Level |                          |                         | 12.4%                 |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,400 and moderate-income families earned less than \$53,440. The median housing value in the AA is \$169,496. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$835 for a low-income borrower and \$1,336 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$953. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 12.4 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, manufacturing and the presence of the University of Kentucky are important economic drivers. The local economy benefits from low business costs, the University's presence, and an educated workforce. The Lexington area also benefits from having abundant developable land relative to other metropolitan areas throughout the United States. Automobile manufacturing occurs at Toyota's Georgetown, KY plant located just outside of Lexington city limits. Supply chain issues with semi-conductors have hampered

output, but robust consumer demand for automobiles will preserve manufacturing jobs in this area. Housing prices have increased as demand outpaces the supply of single-family homes. The University's presence and number of college students makes Lexington highly dependent on multifamily housing. This has contributed to the market for single-family homes being undersupplied while demand is surging. Potential weaknesses for this economy include reliance on state government spending. Lexington's close proximity to Kentucky's state capital in Frankfort could impact the economy beyond fiscal tightening with university spending. Top employers include the University of Kentucky, Baptist Health, Conduent, Veterans Medical Center, and Catholic Health Initiatives.

The unemployment rate for the Lexington MSA was 4.1 percent as of January 2017. Unemployment levels significantly increased from 3.8 percent in March 2020 to 15.8 percent in April 2020 due to the impacts of COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate was 2.6 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

### **Community Contacts**

As part of this evaluation, the OCC reviewed information from a representative of a local CD organization to better understand area credit and community needs. The representative stated that start-up business funds were a need. The contact also noted that limited land availability has an impact on the housing market in the Lexington area. In general, the contact expressed the willingness of local banks to both lend and donate to community projects.

### **Scope of Evaluation in Kentucky**

The Lexington CSA received a full-scope review. This area accounted for 79 percent of deposits and 74 percent of the lending in the state during the evaluation period. The remaining AAs received a limited-scope review. FTB did not originate or purchase enough small loans to farms in the Owensboro MSA in the state of Kentucky to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY**

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Kentucky is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Lexington CSA was excellent. Performance in the limited-scope areas supported the overall Lending Test rating

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans*</b> |               |                |            |                       |       |                |                  |
|-------------------------|---------------|----------------|------------|-----------------------|-------|----------------|------------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total | % State* Loans | % State Deposits |
| Lexington CSA           | 4,056         | 1,222          | 38         | 51                    | 5,367 | 74.4           | 78.9             |
| Owensboro MSA           | 411           | 75             | 1          | 6                     | 493   | 6.8            | 3.4              |
| KY Non-MSA              | 1,005         | 264            | 69         | 20                    | 1,358 | 18.7           | 17.7             |
| Total                   | 5,472         | 1,561          | 108        | 77                    | 7,218 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |               |                |            |                       |           |                |                  |
|-----------------------------------------|---------------|----------------|------------|-----------------------|-----------|----------------|------------------|
| Assessment Area                         | Home Mortgage | Small Business | Small Farm | Community Development | Total     | % State* Loans | % State Deposits |
| Lexington CSA                           | 692,721       | 116,427        | 3,686      | 57,178                | 870,012   | 83.7           | 78.9             |
| Owensboro MSA                           | 41,669        | 4,726          | 1          | 3,833                 | 50,229    | 4.8            | 3.4              |
| KY Non-MSA                              | 97,874        | 9,563          | 8,194      | 4,167                 | 119,798   | 11.5           | 17.7             |
| Total                                   | 832,264       | 130,716        | 11,881     | 65,178                | 1,040,039 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 9.9 percent and ranked third among 41 FDIC-insured banks, which placed it in the top 8 percent of banks.

The bank had a market share of 3.4 percent based on the number of home mortgage loans originated or purchased and ranked sixth among 443 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 16.3 percent were Rocket Mortgage (6 percent), Central Bank & Trust Company (5.3 percent), and University of Kentucky Federal Credit Union (5 percent).

The bank had a market share of 3.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked 10<sup>th</sup> out of 126 small business lenders, which placed it in the top 8 percent of lenders. The top three lenders with a combined market share of 37.7 percent were Central Bank & Trust Company (13.6 percent), American Express National Bank (13.5 percent), and JPMorgan Chase Bank, N.A. (10.7 percent).

The bank had a market share of 0.3 percent based on the number of small loans to farms originated or purchased. The bank ranked 16<sup>th</sup> out of 25 small farm lenders, which placed it in the top 64 percent of lenders. The top three lenders with a combined market share of 48.6 percent were JPMorgan Chase Bank, N.A. (18.9 percent), Whitaker Bank (16.6 percent), and John Deere Financial, F.S.B. (13.1 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Kentucky 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was near the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Kentucky 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was near the percentage of businesses in low-income geographies but was below the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Kentucky 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank made no small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 9.6 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank collected or considered the gross annual revenues in the underwriting of all small loans to farms in this AA. The bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Kentucky.

The Lending Activity Tables, shown above, set forth 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 51 CD loans totaling nearly \$57.2 million, which represented 34.9 percent of allocated tier 1 capital. By dollar volume, 8.7 percent of these loans funded affordable housing, 2.4 percent funded economic development, 50 percent funded revitalization and stabilization efforts, and 38.9 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$5 million PPP loan to a local business allowing it to meet critical needs and continue operations during the COVID-19 pandemic.
- \$5 million line of credit to the county transit authority that provides service to a majority of low- and moderate-income persons. The funding allowed the transit authority to continue operations uninterrupted and manage cash flows during delays in funding.
- \$500,000 line of credit to an organization that provides community services to low- and moderate-income persons by providing basic needs, advocating educational attainment, and improving financial stability. The funding allowed the organization to manage cash flow between the receipt of donations.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 370 loans under flexible lending programs specific to the AA totaling \$56.5 million. Program volumes included 32 KHC loans totaling \$2.4 million, four 53 Community Mortgage loans totaling \$562,000, 139 FHA loans totaling \$21.8 million, 68 Freddie Mac HP loans totaling \$10.3 million, 37 Fannie Mae HR loans totaling \$5.5 million, one Fannie Mae RN loans totaling \$159,000, 30 USDA/RA loans totaling \$4.4 million, and 59 VA loans totaling \$11.5 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Owensboro MSA and KY Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope areas supported the overall Lending Test rating.

Refer to Tables O through T in the state of Kentucky in appendix D for the facts and data supporting these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in Kentucky is rated High Satisfactory.

Based on a full-scope review, FTB's performance in the Lexington MSA was excellent. Performance in the limited-scope areas lowered the overall Investment Test rating.

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |                |          |                |          |       |              |          |               |                         |          |
|------------------------|----------------|----------|----------------|----------|-------|--------------|----------|---------------|-------------------------|----------|
| Assessment Area        | Prior Period** |          | Current Period |          | Total |              |          |               | Unfunded Commitments*** |          |
|                        | #              | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                       | \$(000s) |
| Lexington MSA          | 15             | 5,269    | 143            | 14,110   | 158   | 74.9         | 19,379   | 96.2          | 10                      | \$618    |
| Owensboro MSA          | 3              | 196      | 21             | 46       | 24    | 11.4         | 242      | 1.2           | 1                       | \$2      |
| KY Non- MSA            | 3              | 483      | 26             | 40       | 29    | 13.7         | 523      | 2.6           | 3                       | \$68     |
| Total                  | 21             | 5,948    | 190            | 14,196   | 211   | 100.0        | 20,144   | 100.0         | 14                      | \$688    |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

## Lexington MSA

The bank made 143 investments totaling \$14.1 million during the evaluation period to approximately 50 organizations/projects. The dollar volume of current and prior period investments represented 11.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 94.6 percent of investments supported affordable housing, 0.2 percent supported revitalization and stabilization efforts, 3.8 percent funded community services to low- and moderate-income individuals, and 1.4 percent supported economic development. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$7.6 million LIHTC project for 252 units of affordable housing in Lexington. Units are income restricted to households earning at or below 60 percent of the AMI. The project involved multiple sources of financing including the city's HOME fund and affordable housing fund.
- \$4.8 million investment that will assist in renovating 144 units of affordable housing in Lexington. All units are income restricted to households earning at or below 80 percent of the AMI. The project also received funds from the KHC and the city's Affordable Housing Trust Fund.
- \$736,000 investment for 134 units of LIHTC senior housing in Lexington. The project participates in the HUD Section 8 housing rental assistance program. Units are restricted to renters earning up to 30 percent of the AMI.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Investment Test in the Owensboro MSA and KY Non-MSA AAs was weaker than the bank's overall performance under the Investment Test in the full-scope area due to lower levels of investments. Performance in the limited-scope areas lowered the overall Investment Test rating.



## SERVICE TEST

The bank's performance under the Service Test in Kentucky is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lexington CSA is excellent.

### Retail Banking Services

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Lexington CSA                           | 78.9                           | 14                 | 63.6                           | 14.3                                              | 21.4 | 21.4 | 28.6 | 0.0 | 6.4                                   | 20.9 | 37.5 | 35.2 | 0.0 |
| Owensboro MSA                           | 3.4                            | 2                  | 9.1                            | 0.0                                               | 50.0 | 50.0 | 0.0  | 0.0 | 3.7                                   | 24.2 | 46.4 | 25.6 | 0.0 |
| KY Non-MSA                              | 17.7                           | 6                  | 27.3                           | 0.0                                               | 0.0  | 66.7 | 33.3 | 0.0 | 0.0                                   | 3.2  | 56.7 | 40.0 | 0.0 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 27 ATMs in the AA, of which 18 were deposit-taking.

| 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 |
| Lexington CSA                             | 0                    | 1                    | 0                                           | 0   | 0   | -1  | 0  |
| Owensboro MSA                             | 0                    | 1                    | 0                                           | 0   | 0   | -1  | 0  |
| KY Non-MSA                                | 0                    | 2                    | 0                                           | 0   | -2  | 0   | 0  |

\* The tables present 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. The bank closed one branch, which was in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours for branches in low- and moderate-income geographies were the same as branches in middle- and upper income geographies.

## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 113 qualified CD service activities to 42 organizations logging 1,730 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 78 of these activities with 14 employees providing 1,244 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

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

- Two employees served on a committee for an economic development organization. The employees provided a total of 150 hours of service.
- Bank staff provided 17 financial education programs, which included one YBC for 120 students.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Owensboro MSA and KY Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had minimal effect on the overall Service Test rating in the state of Kentucky.

## State of Michigan

**CRA rating for the State of Michigan<sup>10</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and the overall distribution of loans by borrower income and businesses of different sizes were good.
- FTB was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Michigan

FTB delineated seven AAs in Michigan. They include a portion of the Detroit-Warren-Ann Arbor (Detroit) CSA; Grand Rapids-Kentwood-Muskegon (Grand Rapids) CSA; Jackson MSA in its entirety; Kalamazoo-Battle Creek-Portage (Kalamazoo) CSA; Lansing MSA in its entirety; Saginaw-Midland-Bay City (Saginaw) CSA in its entirety; and 13 non-MSA (MI Non-MSA) counties. The Non-MSA counties were combined into one AA for analysis and presentation. The state rating does not include the counties in the South Bend CSA that were reviewed as part of the MMSA analysis. Refer to appendix A for a list of counties reviewed.

Michigan was FTB's fourth largest rating area based on total deposits. The bank had nearly \$21 billion in deposits in the state, which represented 12.4 percent of its deposits. The combined areas were served by 82 FDIC-insured banks operating 1,823 branches. FTB ranked sixth with 7.2 percent deposit market share. The top three banks and their market share were JPMorgan Chase Bank, N.A. (25.3 percent), Comerica Bank (13.4 percent), and The Huntington National Bank (12.8 percent). FTB had 168 branches and 274 ATMs. During the evaluation period, the bank made \$9.8 billion or 16.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Detroit CSA

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

---

<sup>10</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

| Table A – Demographic Information of the Assessment Area                                                                                                                                  |           |               |                              |                  |                 |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Detroit CSA                                                                                                                                                              |           |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                               | #         | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                               | 1,547     | 13.6          | 24.0                         | 33.0             | 27.1            | 2.1           |
| Population by Geography                                                                                                                                                                   | 5,128,583 | 10.5          | 22.1                         | 35.4             | 31.5            | 0.5           |
| Housing Units by Geography                                                                                                                                                                | 2,258,841 | 12.2          | 23.9                         | 34.8             | 28.8            | 0.4           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 1,365,522 | 6.1           | 18.5                         | 38.6             | 36.6            | 0.1           |
| Occupied Rental Units by Geography                                                                                                                                                        | 626,645   | 19.4          | 30.9                         | 31.0             | 17.9            | 0.8           |
| Vacant Units by Geography                                                                                                                                                                 | 266,674   | 26.0          | 34.7                         | 23.9             | 14.4            | 1.1           |
| Businesses by Geography                                                                                                                                                                   | 422,939   | 8.0           | 19.4                         | 32.8             | 38.8            | 0.9           |
| Farms by Geography                                                                                                                                                                        | 10,035    | 4.7           | 14.9                         | 45.8             | 34.4            | 0.3           |
| Family Distribution by Income Level                                                                                                                                                       | 1,284,089 | 22.8          | 16.5                         | 19.1             | 41.6            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 1,992,167 | 25.1          | 15.6                         | 16.9             | 42.4            | 0.0           |
| Median Family Income MSA - 11460 Ann Arbor, MI MSA                                                                                                                                        |           | \$87,331      | Median Housing Value         |                  |                 | \$130,852     |
| Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI                                                                                                                             |           | \$52,733      | Median Gross Rent            |                  |                 | \$863         |
| Median Family Income MSA - 22420 Flint, MI MSA                                                                                                                                            |           | \$53,333      | Families Below Poverty Level |                  |                 | 12.7%         |
| Median Family Income MSA - 33780 Monroe, MI MSA                                                                                                                                           |           | \$67,811      |                              |                  |                 |               |
| Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI                                                                                                                         |           | \$76,739      |                              |                  |                 |               |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |           |               |                              |                  |                 |               |

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$26,367 to \$38,370 and moderate-income families earned less than \$42,186 to \$61,391, depending on the MSA/MD. The median housing value in the AA is \$130,852. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$659 to \$959 for a low-income borrower and \$1,055 to \$1,535 for a moderate-income borrower, depending on the MSA/MD. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$695. Based on these calculations, low-income borrowers in the Detroit CSA would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 12.7 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, manufacturing, healthcare, and logistics are important economic drivers of the Detroit economy. Detroit remains a center of automobile industry headquarters, production, and research and development. Supply chain issues, especially with semiconductor chips, have had an outsized negative impact on this economy throughout 2021. This has resulted in idle plants impacting not only automobile manufacturers but upstream parts manufacturers. Pent-up demand for vehicles due to high prices will likely benefit the industry into the middle of the 2020s. Transportation and warehousing also provide a sound boost to the Detroit economy with significant goods passing over bridges into the Canadian province of Ontario. Weaknesses for Detroit's economy include a high crime rate, eroding infrastructure, municipal fiscal challenges, and deterioration of city schools, partially because of municipal fiscal challenges. Migration out of Detroit continues to negatively impact the city. Top employers in Detroit include General Motors, the Ford Motor Company, Chrysler Group LLC, Beaumont Health System, and the Henry Ford Health System.

The unemployment rate for the Detroit CSA was 5.5 percent as of January 2017. Unemployment levels significantly increased from 5 percent in March 2020 to 24 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the Detroit CSA was 4.2 percent as of December 2021. The national rate was 3.7 percent as of December 2021.

## Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts within the Detroit CSA to better understand area credit and community needs. Contacts worked for a variety of organizations focused on affordable housing and community development. Another contact worked in local city government. Contacts expressed a wide range of needs for the CSA, but each contact described needs associated with housing. Loans and/or grants for home repairs and rehabilitation were consistently mentioned. Housing stock is aging, especially in the city of Detroit. Many older row homes and apartment units date back to the 1950s and 1960s. Contacts also described the need for reliable and affordable public transportation, emergency utility assistance grants as the cost of energy rises, and improvements in local schools. The greatest needs include:

- Affordable housing.
- Rehabilitation loans and grants for rehabilitation of aging housing stock.
- Grants to support reliable public transportation throughout the Detroit-metro area for low- and moderate-income individuals and families.
- Emergency utility assistance grants to help offset higher energy costs for nonprofits and low- and moderate-income families.
- Investments in local Detroit public schools.

## Scope of Evaluation in Michigan

The Detroit CSA received a full-scope review. This area accounted for 41.9 percent of deposits and 37.4 percent of lending in the state during the evaluation period. The remaining AAs received a limited-scope review. The state of Michigan received substantial weight in determining the overall rating of the bank. FTB did not originate or purchase enough small loans to farms in the Jackson MSA, Kalamazoo CSA, Lansing MSA, or Saginaw CSA in the state of Michigan to conduct a meaningful analysis.

## 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 Detroit CSA AA was excellent. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans*</b> |               |                |            |                       |        |                |                  |
|-------------------------|---------------|----------------|------------|-----------------------|--------|----------------|------------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total  | % State* Loans | % State Deposits |
| Detroit CSA             | 16,559        | 9,370          | 25         | 221                   | 26,175 | 37.1           | 41.9             |
| Grand Rapids CSA        | 19,987        | 5,926          | 32         | 147                   | 26,092 | 37.0           | 35.2             |
| Jackson MSA             | 555           | 234            | 5          | 8                     | 802    | 1.1            | 0.5              |
| Kalamazoo CSA           | 3,523         | 1,080          | 4          | 23                    | 4,630  | 6.6            | 5.5              |
| Lansing MSA             | 3,843         | 1,299          | 15         | 39                    | 5,196  | 7.4            | 6.4              |
| Saginaw CSA             | 653           | 377            | 0          | 11                    | 1,041  | 1.5            | 0.8              |
| MI Non-MSA              | 4,754         | 1,801          | 36         | 41                    | 6,632  | 9.4            | 9.6              |
| Total                   | 49,874        | 20,087         | 117        | 490                   | 70,568 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |               |                |            |                       |            |                |                  |
|-----------------------------------------|---------------|----------------|------------|-----------------------|------------|----------------|------------------|
| Assessment Area                         | Home Mortgage | Small Business | Small Farm | Community Development | Total      | % State* Loans | % State Deposits |
| Detroit CSA                             | 2,626,942     | 1,248,408      | 461        | 603,164               | 4,478,975  | 40.2           | 41.9             |
| Grand Rapids CSA                        | 2,787,714     | 738,912        | 1,060      | 273,278               | 3,800,964  | 34.1           | 35.2             |
| Jackson MSA                             | 62,889        | 37,092         | 73         | 123,678               | 223,732    | 2.0            | 0.5              |
| Kalamazoo CSA                           | 494,771       | 142,720        | 105        | 67,111                | 704,707    | 6.3            | 5.5              |
| Lansing MSA                             | 461,292       | 150,046        | 191        | 118,561               | 730,090    | 6.6            | 6.4              |
| Saginaw CSA                             | 73,820        | 55,834         | 0          | 131,798               | 261,452    | 2.3            | 0.8              |
| MI Non-MSA                              | 703,300       | 211,326        | 3,508      | 27,107                | 945,241    | 8.5            | 9.6              |
| Total                                   | 7,210,728     | 2,584,338      | 5,398      | 1,344,697             | 11,145,161 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 4 percent and ranked seventh among 47 FDIC-insured banks, which placed it in the top 15 percent of banks.

The bank had a market share of 1.8 percent based on the number of home mortgage loans originated or purchased and ranked 10<sup>th</sup> among 735 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 29 percent were Rocket Mortgage (15.3 percent), United Wholesale Mortgage (10 percent), and JPMorgan Chase Bank, N.A. (3.7 percent).

The bank had a market share of 2.9 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 264 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 37.3 percent were JPMorgan Chase Bank, N.A. (15.2 percent), American Express National Bank (14.1 percent), and Bank of America, N.A. (8 percent).

The bank had a market share of 0.8 percent (2019 data) based on the number of small loans to farms originated or purchased and ranked 15<sup>th</sup> out of 22 small farm lenders, which placed it in the top 69 percent of lenders. The top three lenders with a combined market share of 57.5 percent were JPMorgan Chase Bank, N.A. (32.6 percent), John Deere Financial, F.S.B. (13.4 percent), and U.S. Bank, N.A. (11.5 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses by all lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table S 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was near the percentage of farms in low-income geographies and exceeded the aggregate distribution of small loans to farms by all lenders. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 11.3 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 the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.



### ***Small Loans to Farms***

Refer to Table T in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 4 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 near the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to farms by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Michigan.

The Lending Activity Tables, shown above, set forth 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 221 CD loans totaling nearly \$603.2 million, which represented 69.3 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 3.2 percent of these loans funded affordable housing, 36.3 percent funded economic development, 33.1 percent funded revitalization and stabilization efforts, and 27.4 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$16.4 million loan for the construction of a 160-bed skilled nursing facility that will redevelop an existing brownfield. The project is the first new skilled nursing facility built in the city in over 30 years. The project is expected to create 139 new jobs.
- \$3 million loan to a CDFI that provides direct capital, loans, and technical assistance to small business owners in the Detroit area.
- \$1.9 million loan for the construction of a 43-unit apartment complex to help address chronic homelessness in Detroit and provide permanent housing. The facility also provides on-site health care, substance abuse treatment, and job-readiness training to the residents and surrounding community. The project received multiple sources of funding including the city of Detroit and the MSHDA, and federal HOME funds.

### **Product Innovation and Flexibility**

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 792 loans under flexible lending programs specific to the AA totaling \$101.1 million. Program volumes included 170 MSHDA loans totaling \$8.2 million, one 53 Community Mortgage loan totaling

\$68,000, 369 FHA loans totaling \$51.8 million, 90 Freddie Mac HP loans totaling \$12.4 million, one Fannie Mae HR loan totaling \$263,000, 41 Fannie Mae RN loans totaling \$5.9 million, 11 USDA/RA loans totaling \$1.4 million, and 109 VA loans totaling \$21.1 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Grand Rapids CSA, Jackson MSA, Kalamazoo CSA, Lansing MSA, and MI Non-MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the Saginaw CSA was weaker than the bank's overall performance under the Lending Test in the full-scope area due to weaker geographic and/or borrower distribution of loans. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of Michigan in appendix D for the facts and data supporting these conclusions.

## INVESTMENT TEST

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

Based on a full-scope review, the institution's performance in the Detroit CSA AA was excellent. Performance in the limited-scope areas had a minimal effect on the Investment Test rating for the state of Michigan.

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |          |                |           |       |              |           |               |                        |          |
|-----------------------|---------------|----------|----------------|-----------|-------|--------------|-----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |           | Total |              |           |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s)  | #     | % of Total # | \$(000s)  | % of Total \$ | #                      | \$(000s) |
| Detroit CSA           | 79            | \$33,242 | 503            | \$101,953 | 582   | 39.7         | \$135,195 | 44.6          | 60                     | \$1,784  |
| Grand Rapids CSA      | 45            | \$23,913 | 391            | \$55,464  | 436   | 29.7         | \$79,377  | 26.2          | 40                     | 4,648    |
| Jackson MSA           | 3             | \$122    | 16             | \$297     | 19    | 1.3          | \$419     | 0.1           | 3                      | 14       |
| Kalamazoo CSA         | 16            | \$4,325  | 87             | \$17,693  | 103   | 7.0          | \$22,018  | 7.3           | 13                     | 256      |
| Lansing MSA           | 19            | \$5,253  | 87             | \$31,323  | 106   | 7.2          | \$36,576  | 12.1          | 11                     | 538      |
| Saginaw CSA           | 7             | \$641    | 53             | \$2,356   | 60    | 4.1          | \$2,997   | 1.0           | 5                      | 46       |
| MI Non-MSA            | 35            | \$9,693  | 125            | \$16,893  | 160   | 10.9         | \$26,586  | 8.8           | 23                     | 597      |
| Total                 | 204           | 77,189   | 1,262          | 225,979   | 1,466 | 100.0        | 303,168   | 1000          | 155                    | 7,883    |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 503 investments totaling \$101.9 million during the evaluation period to over 200 organizations/projects. The dollar volume of current and prior period investments represented 15.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 92 percent of investments supported affordable housing, 4.2 percent supported economic development, 3.4 percent funded community services to low- and moderate-income individuals, and 0.4 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$15.6 million investment for the construction of a 77-unit LIHTC apartment complex for seniors. The redevelopment of the former Montgomery Ward property is part of the East Dearborn Downtown Development Authority Plan and Dearborn's Master Plan.
- \$10.2 million investment for the construction of a 54-unit affordable housing unit building for low- and moderate-income seniors in Livonia. Income is restricted to persons earning between 30 and 60 percent of the AMI. Financing of the project was also provided by the MSHDA and Michigan Economic Development Corporation.
- \$3 million investment in a non-profit CDFI fund to help revitalize economically distressed neighborhoods in Detroit. The fund provides loans and technical assistance to small business owners, developers, building owners, contractors, and subcontractors who are unable to receive capital from traditional financing sources.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Investment Test in the Grand Rapids CSA, Kalamazoo CSA, Lansing MSA, Saginaw CSA, and MI Non-MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance in the Jackson MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower volume of investments. Performance in the limited-scope areas had a minimal effect on the Investment Test rating for the state of Michigan.

## **SERVICE TEST**

The bank's performance under the Service 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 Detroit CSA was excellent.

## Retail Banking Services

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |       |      |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|-------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Detroit CSA                             | 41.9                           | 77                 | 45.8                           | 11.7                                              | 16.9  | 39.0 | 32.5 | 0.0 | 10.5                                  | 22.1 | 35.4 | 31.5 | 0.5 |
| Grand Rapids CSA                        | 35.2                           | 50                 | 29.8                           | 4.0                                               | 18.0  | 44.0 | 34.0 | 0.0 | 5.2                                   | 18.7 | 49.9 | 26.1 | 0.2 |
| Jackson MSA                             | 0.01                           | 1                  | 0.6                            | 0.0                                               | 100.0 | 0.0  | 0.0  | 0.0 | 9.9                                   | 19.4 | 47.4 | 20.1 | 3.2 |
| Kalamazoo CSA                           | 5.5                            | 10                 | 6.0                            | 0.0                                               | 30.0  | 40.0 | 30.0 | 0.0 | 8.1                                   | 19.2 | 46.7 | 24.7 | 1.2 |
| Lansing MSA                             | 6.4                            | 12                 | 7.1                            | 8.3                                               | 25.0  | 50.0 | 16.7 | 0.0 | 5.4                                   | 19.4 | 44.5 | 27.1 | 3.6 |
| Saginaw CSA                             | 0.8                            | 3                  | 1.8                            | 0.0                                               | 66.7  | 66.7 | 33.3 | 0.0 | 6.7                                   | 16.6 | 48.2 | 28.5 | 0.0 |
| MI Non-MSA                              | 9.6                            | 15                 | 8.9                            | 0.0                                               | 6.7   | 60.0 | 33.3 | 0.0 | 1.5                                   | 8.1  | 69.0 | 21.4 | 0.0 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners gave positive consideration for 10 branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 101 ATMs in the AA, of which 98 were deposit-taking.

| 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 |
| Detroit CSA                               | 3                    | 13                   | 0                                           | -3  | -4  | -3  | 0  |
| Grand Rapids CSA                          | 1                    | 5                    | 0                                           | -1  | -4  | 1   | 0  |
| Jackson MSA                               | 0                    | 1                    | 0                                           | 0   | -1  | 0   | 0  |
| Kalamazoo CSA                             | 0                    | 3                    | 0                                           | -1  | -1  | -1  | 0  |
| Lansing MSA                               | 0                    | 2                    | 0                                           | 0   | 0   | -2  | 0  |
| Saginaw CSA                               | 0                    | 1                    | 0                                           | 0   | -1  | 0   | 0  |
| MI Non-MSA                                | 0                    | 6                    | 0                                           | -1  | -3  | -2  | 0  |

\* The tables present 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 has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Detroit CSA, the bank opened three branches, one in a moderate-income geography, and closed 13 branches, four of which were in moderate-income geographies. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Average hours at branches in low- and moderate-income geographies consistent with branches in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 546 qualified CD service activities to over 200 organizations logging 21,412 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 181 of these activities with 181 employees providing 6,400 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and economic development needs.

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

- An employee of the bank served on the board of a federally qualified health center serving Oakland County. The employee provided 600 hours of service.
- Bank employees conducted nearly 190 financial education sessions, which included 46 YBC sessions to nearly 1,700 students.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Grand Rapids CSA and Lansing MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance under the Service Test in the Jackson MSA, Kalamazoo CSA, Saginaw CSA, and MI Non-MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope areas had a minimal effect on the overall Service Test rating in the state of Michigan.

## State of North Carolina

### **CRA rating for the State of North Carolina: Outstanding**

**The Lending Test is rated: Outstanding**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and the overall distribution of loans by borrower income and businesses of different sizes were excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

### **Description of Institution's Operations in North Carolina**

FTB delineated five AAs in North Carolina. They include a portion of the Asheville-Marion-Brevard (Asheville) CSA; Charlotte-Concord (Charlotte) CSA; Hickory-Lenoir-Morganton (Hickory) MSA in its entirety; Raleigh-Durham-Cary (Raleigh) CSA; and four Non-MSA (NC Non-MSA) counties. The Non-MSA counties were combined into one AA for analysis and presentation. Refer to appendix A for a list of counties reviewed.

North Carolina was FTB's seventh largest rating area based on total deposits. The bank had nearly \$7.1 billion in deposits in the state, which represented 4.2 percent of the bank's total deposits. The combined areas were served by 63 FDIC-insured banks operating 851 branches. FTB ranked fifth with 2 percent deposit market share. The top three banks and their market share were Bank of America, N.A. (55.3 percent), Truist Bank (16.7 percent), and Wells Fargo Bank, N.A. (15 percent). FTB had 74 branches and 97 ATMs. During the evaluation period, the bank made nearly \$2.9 billion or 5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Charlotte CSA

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

**Table A – Demographic Information of the Assessment Area****Assessment Area: Charlotte CSA**

| <b>Demographic Characteristics</b>                                     | <b>#</b>  | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA* %<br/>of #</b> |
|------------------------------------------------------------------------|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                            | 425       | 8.2                   | 23.1                         | 32.9                     | 34.8                    | 0.9                   |
| Population by Geography                                                | 1,872,268 | 6.9                   | 22.1                         | 34.8                     | 36.0                    | 0.3                   |
| Housing Units by Geography                                             | 769,641   | 7.0                   | 22.5                         | 35.1                     | 35.2                    | 0.1                   |
| Owner-Occupied Units by Geography                                      | 450,379   | 2.8                   | 17.8                         | 37.9                     | 41.5                    | 0.0                   |
| Occupied Rental Units by Geography                                     | 247,325   | 13.9                  | 29.8                         | 30.0                     | 26.2                    | 0.2                   |
| Vacant Units by Geography                                              | 71,937    | 9.9                   | 27.3                         | 35.4                     | 27.2                    | 0.2                   |
| Businesses by Geography                                                | 223,743   | 6.4                   | 17.5                         | 29.2                     | 46.3                    | 0.7                   |
| Farms by Geography                                                     | 5,085     | 3.9                   | 16.3                         | 46.1                     | 33.5                    | 0.2                   |
| Family Distribution by Income Level                                    | 467,538   | 21.6                  | 16.5                         | 18.7                     | 43.2                    | 0.0                   |
| Household Distribution by Income Level                                 | 697,704   | 22.5                  | 15.9                         | 17.5                     | 44.2                    | 0.0                   |
| Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA |           | \$64,187              | Median Housing Value         |                          |                         | \$191,246             |
| Median Family Income Non-MSAs – NC                                     |           | \$47,217              | Median Gross Rent            |                          |                         | \$902                 |
|                                                                        |           |                       | Families Below Poverty Level |                          |                         | 11.1%                 |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$32,094 and moderate-income families earned less than \$51,350. The median housing value in the AA is \$191,246. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$802 for a low-income borrower and \$1,284 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,031. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.1 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, the economy remains strong and is driven by construction, logistics, office-using industries, and finance and insurance jobs. Single-family housing is overvalued, and housing growth is accelerating. Professional and business services, government, retail trade, and education and health services are

economic drivers of the economy. The largest employers are Atrium Health, Wells Fargo & Co., Walmart, Bank of America Corp., and Novant Health Inc.

The unemployment rate for the Charlotte CSA was 4.9 percent as of January 2017. Unemployment levels increased significantly from 3.7 percent in March 2020 to 13.9 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate for the CSA was 3.2 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

This evaluation considers comments provided by two local organizations that serve the Charlotte CSA. The organizations included one affordable housing organization and one community development organization that helps to address the causes and conditions of poverty.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable for-sale and rental housing.
- Small businesses economic development.
- Closing cost assistance.
- Financial literacy/education.
- Home ownership and credit counseling.

Opportunities for participation by financial institutions include the following:

- Lending, investment, and service in affordable housing.
- Lending and investment in economic development and workforce development.
- Funding and supporting CD services such as financial literacy.

## **Scope of Evaluation in North Carolina**

The Charlotte CSA received a full-scope review. This AA accounted for 82.3 percent of the deposits and 76.7 percent of the lending in the state during the evaluation period. The remaining AAs received limited-scope reviews. FTB originated or purchased enough small loans to farms to conduct a meaningful analysis only in the Charlotte CSA in the state of North Carolina.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Charlotte CSA AA is excellent. Performance in the limited-scope areas had a minimal effect on the overall Lending Test rating.



## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| <b>Number of Loans*</b> |               |                |            |                       |        |                |                  |
|-------------------------|---------------|----------------|------------|-----------------------|--------|----------------|------------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total  | % State* Loans | % State Deposits |
| Charlotte CSA           | 8,648         | 4,698          | 36         | 44                    | 13,426 | 76.7           | 82.3             |
| Asheville CSA           | 600           | 246            | 2          | 7                     | 855    | 4.9            | 2.4              |
| Hickory MSA             | 258           | 78             | 0          | 0                     | 336    | 1.9            | 0.9              |
| Raleigh CSA             | 1,614         | 716            | 1          | 15                    | 2,346  | 13.4           | 12.0             |
| NC Non-MSA              | 351           | 176            | 7          | 0                     | 534    | 3.1            | 2.4              |
| Total                   | 11,471        | 5,914          | 46         | 66                    | 17,497 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |               |                |            |                       |           |                |                  |
|-----------------------------------------|---------------|----------------|------------|-----------------------|-----------|----------------|------------------|
| Assessment Area                         | Home Mortgage | Small Business | Small Farm | Community Development | Total     | % State* Loans | % State Deposits |
| Charlotte CSA                           | 1,685,523     | 392,292        | 2,707      | 245,394               | 2,325,916 | 72.5           | 82.3             |
| Asheville CSA                           | 104,449       | 19,694         | 26         | 13,517                | 137,686   | 4.3            | 2.4              |
| Hickory MSA                             | 47,753        | 5,020          | 0          | 0                     | 52,773    | 1.6            | 0.9              |
| Raleigh CSA                             | 488,856       | 81,169         | 311        | 68,978                | 639,314   | 19.9           | 12.0             |
| NC Non-MSA                              | 47,268        | 6,135          | 213        | 0                     | 53,616    | 1.7            | 2.4              |
| Total                                   | 2,373,848     | 504,310        | 3,257      | 32,889                | 3,209,305 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank had deposit market share of 1.9 percent and ranked fourth among 39 FDIC-insured banks, which placed it in the top 11 percent of banks.

The bank had a market share of 1.5 percent based on the number of home mortgage loans originated or purchased and ranked 19<sup>th</sup> among 833 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 18.9 percent were Rocket Mortgage (8.9 percent), Wells Fargo Bank, N.A. (5.4 percent), and Movement Mortgage, LLC (4.6 percent).

The bank had a market share of 3 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 244 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 36.7 percent were Bank of America, N.A. (13.4 percent), American Express National Bank (12.3 percent), and Wells Fargo Bank, N.A. (11 percent).

The bank had a market share of 1.3 percent based on the number of small loans to farms originated or purchased and ranked 16<sup>th</sup> out of 26 small farm lenders, which placed it in the top 62 percent of lenders. The top three lenders with a combined market share of 56.1 percent were John Deere Financial, F.S.B. (25.2 percent), Wells Fargo Bank, N.A. (22.2 percent), and Truist Bank (8.7 percent).

## Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of Charlotte CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was near the percentage of owner-occupied homes in low-income geographies and approximated the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Charlotte CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Charlotte CSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms is poor.

The bank made no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 12.4 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Charlotte CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 13.9 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 near the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in North Carolina.

The Lending Activity Tables, shown above, set forth 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 44 CD loans totaling nearly \$245.4 million, which represented 42.7 percent of allocated tier 1 capital. By dollar volume, 44.1 percent of these loans funded affordable housing, 40.1 percent funded economic development, 5.6 percent funded revitalization and stabilization efforts, and 10.2 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$31.8 million loan to develop 202 units of affordable housing in Charlotte. Units are restricted to families earning between 30 and 80 percent of the AMI.
- \$17.5 million construction bridge loan to a non-profit organization for the development of a 144-unit LIHTC housing complex. The organization works to provide safe and affordable housing in Charlotte for low- and moderate-income persons.
- \$5 million loan to a private historically black university that is attended primarily by low- and moderate-income students. Funding helped the university with its growth plans to reach more students within Charlotte's underserved community corridors.

### **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 382 loans under flexible lending programs specific to the AA totaling \$65.4 million. Program volumes included one 53 Community Mortgage loan totaling \$102,000, 190 FHA loans totaling \$30.1 million, 65 Freddie Mac HP loans totaling \$11.1 million, 29 Fannie Mae HR loans totaling \$4 million, 21 USDA/RA loans totaling \$5.4 million, and 63 VA loans totaling \$14.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Asheville CSA, Hickory MSA, Raleigh CSA, and NC Non-MSA AAs was weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance was due to weaker geographic and/or borrower distributions. Performance in the limited-scope areas had a minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in North Carolina is rated Outstanding.

Based on a full-scope review, the FTB's performance in the Charlotte CSA AA is excellent. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |               |          |                |          |       |              |          |               |                        |          |
|------------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area        | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                        | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Charlotte CSA          | 8             | 14,395   | 245            | 44,756   | 253   | 67.1         | \$59,151 | 53.5          | 5                      | 2,712    |
| Asheville CSA          | 3             | 227      | 15             | 66       | 18    | 4.8          | 293      | 0.3           | 0                      | \$0      |
| Hickory MSA            | 1             | 2,418    | 6              | 42       | 7     | 1.9          | 2,460    | 2.2           | 1                      | 122      |
| Raleigh CSA            | 4             | 2,486    | 92             | 46,071   | 96    | 25.5         | 48,557   | 43.9          | 2                      | 108      |
| NC Non-MSA             | 1             | 102      | 2              | 11       | 3     | 0.8          | 113      | 0.1           | 1                      | 15       |
| Total                  | 17            | 19,628   | 360            | 90,946   | 377   | 100          | 110,574  | 100           | 9                      | 2,957    |

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

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 245 investments totaling \$44.8 million during the evaluation period to approximately 118 organizations/projects. The dollar volume of current and prior period investments represented 10.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 96.3 percent of investments supported affordable housing, 2.7 percent funded community services to low- and moderate-income individuals, 0.9 percent funded economic development, and 0.1 percent supported revitalization and stabilization efforts. The institution occasionally used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$7.8 million investment in a LIHTC fund for the development of a 72-unit rental housing complex in Charlotte. Units are income restricted to persons earning up to 60 percent of the AMI.
- \$8.4 million investment in a LIHTC fund for the development of an 80-unit affordable rental housing complex in Concord. Units are income restricted to persons earning up to 60 percent of the AMI.
- \$3 million investment for an 82-unit senior rental housing complex. The property is subject to HUD's Section 8 rental assistance program.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Hickory MSA and Raleigh CSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance in the Asheville CSA and NC Non-MSA was weaker than the bank's overall performance under the Investment Test due to lower levels of investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charlotte CSA was excellent. Performance in the limited-scope areas had minimal effect on the overall Service Test rating in the state of North Carolina.

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |      |       |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|-------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Charlotte CSA                           | 82.3                           | 49                 | 66.2                           | 6.1                                               | 20.4 | 22.4  | 51.0 | 0.0 | 6.9                                   | 22.1 | 34.8 | 36.0 | 0.3 |
| Ashville CSA                            | 2.4                            | 3                  | 100.0                          | 0.0                                               | 0.0  | 100.0 | 0.0  | 0.0 | 1.0                                   | 9.8  | 70.1 | 19.1 | 0.0 |
| Hickory MSA                             | 0.9                            | 1                  | 1.4                            | 0.0                                               | 0.0  | 100.0 | 0.0  | 0.0 | 0.0                                   | 12.9 | 62.0 | 25.0 | 0.0 |
| Raleigh CSA                             | 12.0                           | 17                 | 23.0                           | 11.8                                              | 11.8 | 35.3  | 41.2 | 0.0 | 7.0                                   | 22.0 | 31.6 | 38.6 | 0.8 |
| NC Non-MSA                              | 2.4                            | 4                  | 5.4                            | 0.0                                               | 25.0 | 75.0  | 0.0  | 0.0 | 0.0                                   | 20.3 | 73.0 | 6.8  | 0.0 |

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

## Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low- and moderate-income geographies was near the percentage of the population living within those geographies. Examiners gave positive consideration for three branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 66 ATMs in the AA, of which 63 were deposit-taking.

| 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 |
| Charlotte CSA                             | 17                   | 10                   | 1                                           | 1   | -1  | 6   | 0  |
| Ashville CSA                              | 0                    | 0                    | 0                                           | 0   | 0   | 0   | 0  |
| Hickory MSA                               | 0                    | 0                    | 0                                           | 0   | 0   | 0   | 0  |
| Raleigh CSA                               | 13                   | 1                    | 2                                           | 1   | 4   | 5   | 0  |
| NC Non-MSA                                | 0                    | 1                    | 0                                           | 0   | -1  | 0   | 0  |

\* The table present 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 improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Within the Charlotte CSA, the bank opened 17 branches during the evaluation period: one each in a low- and moderate-income geography. The bank closed 10 branches, all in middle- and upper income geographies. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average branch hours in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

### **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 329 qualified CD service activities to over 150 organizations logging 6,051 qualified hours within the AA during the evaluation period. Leadership is evident through board or committee participation in 121 of these activities with 38 employees providing 1,946 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service, economic development, and affordable housing needs.

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

- An employee of the bank serves on the board of an organization that provides financial and non-financial assistance to residents in need. The employee provided 321 hours of service.
- Bank staff provided 111 financial education programs, which included 16 YBC sessions to over 350 students.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the NC Non-MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance in the Asheville CSA, Hickory MSA, and Raleigh CSA AAs was weaker than the bank's overall performance under the Service Test due to weaker branch distributions. Performance in the limited-scope areas had minimal effect on the overall Service Test rating in the state of North Carolina.

## State of Ohio

**CRA rating for the State of Ohio<sup>11</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of loans was good, and the overall distribution of loans by borrower income and businesses of different sizes was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's branches were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Ohio

FTB delineated six AAs in Ohio. They include a portion of the Cleveland-Akron-Canton (Cleveland) CSA; Columbus-Marion-Zanesville (Columbus) CSA; Dayton-Springfield-Kettering (Dayton) CSA; Lima CSA; Toledo-Findlay-Tiffin (Toledo) CSA; and eight Non-MSA (OH Non-MSA) counties. The state rating does not include the Cincinnati CSA reviewed as part of the MMSA analysis. Refer to appendix A for a complete list of the counties reviewed.

Ohio was FTB's third largest rating area based on total deposits. FTB had \$25.8 billion in deposits in the combined areas, which represented 15.3 percent of the bank's total deposits. The bank ranked fifth in deposit market share with 9.1 percent. There were 137 banks operating within these AAs operating 2,019 branch offices. The top three competitors and their market share included The Huntington National Bank (22.2 percent), JPMorgan Chase Bank, N.A. (14.3 percent), and KeyBank, NA (13.3 percent). FTB had 195 office locations and 372 ATMs within the combined areas. During the evaluation period, the bank made \$10.5 billion or 17.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Columbus CSA

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

---

<sup>11</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area



| Table A – Demographic Information of the Assessment Area                                                                                                                                  |           |               |                              |                  |                 |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Columbus CSA                                                                                                                                                             |           |               |                              |                  |                 |               |
| Demographic Characteristics                                                                                                                                                               | #         | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                               | 455       | 14.9          | 24.2                         | 32.3             | 27.5            | 1.1           |
| Population by Geography                                                                                                                                                                   | 2,046,514 | 9.8           | 21.8                         | 34.9             | 32.4            | 1.1           |
| Housing Units by Geography                                                                                                                                                                | 871,199   | 11.3          | 23.1                         | 34.9             | 30.5            | 0.2           |
| Owner-Occupied Units by Geography                                                                                                                                                         | 483,713   | 4.9           | 18.1                         | 37.6             | 39.4            | 0.0           |
| Occupied Rental Units by Geography                                                                                                                                                        | 303,010   | 17.5          | 30.0                         | 31.8             | 20.3            | 0.4           |
| Vacant Units by Geography                                                                                                                                                                 | 84,476    | 25.6          | 27.2                         | 30.2             | 16.5            | 0.5           |
| Businesses by Geography                                                                                                                                                                   | 154,836   | 9.1           | 18.2                         | 30.2             | 41.9            | 0.5           |
| Farms by Geography                                                                                                                                                                        | 4,854     | 4.5           | 15.2                         | 43.4             | 36.8            | 0.1           |
| Family Distribution by Income Level                                                                                                                                                       | 499,782   | 22.0          | 16.9                         | 19.5             | 41.6            | 0.0           |
| Household Distribution by Income Level                                                                                                                                                    | 786,723   | 24.0          | 16.3                         | 17.2             | 42.5            | 0.0           |
| Median Family Income MSA - 18140<br>Columbus, OH MSA                                                                                                                                      |           | \$70,454      | Median Housing Value         |                  |                 | \$156,829     |
| Median Family Income Non-MSAs - OH                                                                                                                                                        |           | \$55,785      | Median Gross Rent            |                  |                 | \$833         |
|                                                                                                                                                                                           |           |               | Families Below Poverty Level |                  |                 | 10.9%         |
| Source: 2015 ACS and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%.<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |           |               |                              |                  |                 |               |

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$35,227 and moderate-income families earned less than \$56,363. The median housing value in the AA is \$156,829. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$881 for a low-income borrower and \$1,409 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$862. Based on these calculations, some low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. In this AA, 10.9 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, education, financial services, healthcare, manufacturing, and state government activity are the important economic drivers. Columbus is home to The Ohio State University, which contributes to the highly educated workforce in the metro area. Enrollment in local universities has increased, which should also support hiring and growth throughout the metro area. The area has favorable migration patterns, low living costs, and lower business costs than other similarly sized cities. Housing starts are

well below its peak pace, which may cause affordability issues in the city. The largest employers are The Ohio State University, OhioHealth, JP Morgan Chase & Company, Nationwide, Nationwide Children's Hospital Inc., and Kroger.

The unemployment rate for the Columbus CSA was 5 percent as of January 2017. Unemployment levels significantly increased from 4.7 percent in March 2020 to 13.2 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined, and the unemployment rate was 2.8 percent as of December 2021. The national unemployment rate was 3.7 percent as of December 2021.

## **Community Contacts**

As part of the CRA evaluation, the OCC held a listening session with multiple community groups and reviewed two contacts within the AA to better understand area credit and community needs. Participants in the listening session included representatives from local government, affordable housing organizations, and community development corporations. Listening session participants and contacts described numerous needs including affordable housing, small business loans including micro-loans, small dollar loans for individuals, rehabilitation of older housing stock, workforce development programs, financial literacy and coaching associated with personal financial management, and financial education courses. Participants also highlighted the importance of digital literacy in the workforce and the need for financial institutions to offer services in various languages for non-native English speakers. Participants expressed a keen interest in having banks become more involved in CD services that impact individuals in the community. The greatest needs include:

- Affordable housing.
- Investments in LIHTC.
- Small business loans, including micro-loans to smaller businesses.
- Small dollar loans for individual homeowners for rehabilitation of their older houses.
- Workforce development programs that are paired with workforce housing.
- Financial literacy and coaching classes focused on basic and entry-level personal financial management skills.
- Financial education classes to include children and teenagers.

## **Scope of Evaluation in Ohio**

The Columbus CSA received a full-scope review. This area accounted for 27.2 percent of the deposits and 29.6 percent of the lending in the state during the evaluation period. The remaining AAs received limited-scope reviews. The state of Ohio received substantial weight in the overall bank CRA rating based on the level of deposits and lending during the evaluation period. FTB did not originate or purchase enough small loans to farms in the Cleveland CSA or Lima CSA in the state of Ohio to conduct a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

The bank's performance under the Lending Test in the state of Ohio is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus CSA AA is excellent. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* |               |                |            |                       |        |                |                  |
|------------------|---------------|----------------|------------|-----------------------|--------|----------------|------------------|
| Assessment Area  | Home Mortgage | Small Business | Small Farm | Community Development | Total  | % State* Loans | % State Deposits |
| Columbus CSA     | 16,781        | 5,091          | 55         | 88                    | 22,015 | 27.3           | 29.6             |
| Cleveland CSA    | 23,823        | 7,146          | 17         | 128                   | 31,114 | 38.6           | 28.1             |
| Dayton CSA       | 8,935         | 3,030          | 61         | 75                    | 12,101 | 15.0           | 22.1             |
| Toledo CSA       | 9,541         | 2,841          | 38         | 85                    | 12,505 | 15.5           | 17.4             |
| OH Non-MSA       | 1,777         | 334            | 63         | 5                     | 2,179  | 2.7            | 1.9              |
| Lima CSA         | 892           | 146            | 16         | 6                     | 1,060  | 1.3            | 0.9              |
| Total            | 61,749        | 18,588         | 250        | 387                   | 80,974 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| Dollar Volume of Loans* (\$000s) |               |                |            |                       |            |                |                  |
|----------------------------------|---------------|----------------|------------|-----------------------|------------|----------------|------------------|
| Assessment Area                  | Home Mortgage | Small Business | Small Farm | Community Development | Total      | % State* Loans | % State Deposits |
| Columbus CSA                     | 2,928,187     | 452,045        | 2,785      | 199,546               | 3,582,563  | 29.6           | 29.6             |
| Cleveland CSA                    | 3,356,734     | 762,392        | 381        | 682,699               | 4,802,206  | 39.7           | 28.1             |
| Dayton CSA                       | 928,632       | 376,494        | 1,525      | 423,714               | 1,730,365  | 14.3           | 22.1             |
| Toledo CSA                       | 1,140,467     | 309,060        | 1,525      | 220,424               | 1,671,476  | 13.8           | 17.4             |
| OH Non-MSA                       | 169,935       | 24,886         | 1,596      | 6,733                 | 203,150    | 1.7            | 1.9              |
| Lima CSA                         | 76,788        | 9,049          | 318        | 13,427                | 99,582     | 0.8            | 0.9              |
| Total                            | 8,600,743     | 1,933,926      | 8,130      | 1,546,543             | 12,089,342 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had a deposit market share of 7.6 percent and ranked fourth among 59 FDIC-insured banks, which placed it in the top 7 percent of banks.

The bank had a market share of 4 percent based on the number of home mortgage loans originated or purchased and ranked fifth among 633 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders with a combined market share of 17.9 percent were The Huntington National Bank (8 percent), Rocket Mortgage (5 percent), and Union Savings Bank (4.9 percent).

The bank had a market share of 4.9 percent based on the number of small loans to businesses originated or purchased and ranked sixth out of 215 small business lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 41.2 percent were JPMorgan Chase Bank, N.A. (16.7 percent), The Huntington National Bank (13.7 percent), and American Express National Bank (10.8 percent).

The bank had a market share of 4.9 percent based on the number of small loans to farms originated or purchased and ranked sixth out of 215 small farm lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 60.5 percent were The Huntington National Bank (30.4 percent), John Deere Financial, F.S.B. (18.4 percent), and JPMorgan Chase Bank, N.A. (11.7 percent).

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of Ohio 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was near both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Ohio 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and was near the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Ohio 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank made no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

#### ***Home Mortgage Loans***

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 16.4 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

#### ***Small Loans to Farms***

Refer to Table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 16.4 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 near the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to farms by all lenders.

## **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test rating in Ohio.

The Lending Activity Tables, shown above, set forth 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 88 CD loans totaling nearly \$199.5 million, which represented 26.4 percent of allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 18.7 percent of these loans funded affordable housing, 35 percent funded economic development, 34.6 percent funded revitalization and stabilization efforts, and 11.7 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$9.5 million PPP loan to a heavy equipment manufacturer located in a low-income geography in Columbus. The loan allowed the company to meet critical needs during the COVID-19 pandemic.
- \$4.4 million loan for the construction of a 62-unit apartment complex in Columbus. Units are income restricted to individuals earning between 30 to 80 percent of the AMI.
- \$3.9 million PPP loan to a physician group located in a moderate-income geography in Columbus. The loan allowed the office to meet critical needs and continue to operate during the COVID-19 pandemic.

## **Product Innovation and Flexibility**

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. FTB originated or purchased 1,000 loans under flexible lending programs specific to the AA totaling \$157.8 million. Program volumes included nine 53 Community Mortgage loans totaling \$825,000, 378 FHA loans totaling \$60 million, 275 Freddie Mac HP loans totaling \$38.4 million, 67 Fannie Mae HR loans totaling \$9.4 million, two Fannie Mae RN loans totaling \$484,000, 32 USDA/RA loans totaling \$4 million, and 237 VA loans totaling \$44.6 million. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cleveland CSA, Dayton CSA, Lima CSA, and OH Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance under the Lending Test in the Toledo CSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area due to weaker geographic and borrower distributions. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through T in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Ohio is rated Outstanding.

Based on a full-scope review, the FTB's performance in Columbus was excellent. Performance in the limited-scope areas supported the overall Investment Test rating.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |                |          |                |          |       |              |          |               |                         |          |
|------------------------|----------------|----------|----------------|----------|-------|--------------|----------|---------------|-------------------------|----------|
| Assessment Area        | Prior Period** |          | Current Period |          | Total |              |          |               | Unfunded Commitments*** |          |
|                        | #              | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                       | \$(000s) |
| Columbus CSA           | 74             | 24,970   | 397            | 60,638   | 471   | 32.5         | 85,608   | 29.9          | 40                      | 4,654    |
| Cleveland CSA          | 68             | 20,697   | 348            | 63,822   | 416   | 28.7         | 84,519   | 29.5          | 42                      | 2,686    |
| Dayton CSA             | 42             | 8,849    | 198            | 56,992   | 240   | 16.5         | 65,841   | 23.0          | 22                      | 2,381    |
| Lima CSA               | 3              | 367      | 18             | 6,752    | 21    | 1.4          | 7,119    | 2.5           | 2                       | 60       |
| OH Non-MSA             | 16             | 4,949    | 45             | 3,331    | 61    | 4.2          | 8,280    | 2.9           | 12                      | 1,180    |
| Toledo CSA             | 31             | 11,185   | 211            | 23,790   | 242   | 16.7         | 34,975   | 1212.2        | 21                      | 2,391    |
| Total                  | 234            | 71,015   | 1,217          | 215,326  | 1,451 | 100.0        | 286,341  | 100.0         | 139                     | 13,352   |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 397 investments totaling \$60.6 million during the evaluation period to over 175 organizations/projects. The dollar volume of current and prior period investments represented 11.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 89.5 percent of investments supported affordable housing, 6.2 percent supported economic development, 3.6 percent funded community services to low- and moderate-income individuals, and 0.7 percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made tax credit investments in the current period including LIHTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$8.3 million investment for a 150-unit senior rental housing complex in Gahanna. Units are income restricted under the HUD Section 8 rental assistance program.
- \$7.5 million investment to a CDFI that works with the private, non-profit, and public sectors to create and preserve affordable housing opportunities in Columbus, OH and Franklin County.

- \$1.7 million investment in an affordable housing equity fund to renovate a building that will provide 91 units of housing for homeless individuals or for those at risk of homelessness.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Cleveland CSA, Dayton CSA, Lima CSA, Toledo CSA, and OH non-MSA AAs was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in Ohio is rated High Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus CSA AA was excellent. Performance in the limited-scope areas lowered the Service Test rating in Ohio.

## Retail Banking Services

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |      |      |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Columbus CSA                            | 29.6                           | 53                 | 27.2                           | 7.5                                               | 20.8 | 37.7 | 34.0 | 0.0 | 9.8                                   | 21.8 | 34.9 | 32.4 | 1.1 |
| Cleveland CSA                           | 28.1                           | 69                 | 35.4                           | 10.1                                              | 15.9 | 42.0 | 31.9 | 0.0 | 11.0                                  | 18.9 | 39.6 | 30.2 | 0.3 |
| Dayton CSA                              | 22.1                           | 5                  | 17.9                           | 0.0                                               | 20.0 | 48.6 | 31.4 | 0.0 | 7.7                                   | 19.8 | 43.9 | 28.6 | 0.0 |
| Lima CSA                                | 0.9                            | 3                  | 1.5                            | 0.0                                               | 66.7 | 0.0  | 33.3 | 0.0 | 4.6                                   | 15.4 | 46.6 | 33.4 | 0.0 |
| Toledo CSA                              | 17.4                           | 29                 | 14.9                           | 10.3                                              | 17.2 | 34.5 | 37.9 | 0.0 | 10.0                                  | 15.4 | 43.7 | 30.2 | 0.7 |
| OH Non-MSA                              | 1.9                            | 6                  | 3.1                            | 0.0                                               | 83.3 | 16.7 | 0.0  | 0.0 | 2.7                                   | 27.6 | 56.4 | 10.1 | 3.2 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners gave positive consideration for five branches in middle- and upper income geographies that were on the opposite side of the street from low- or moderate-income geographies.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 106 ATMs in the AA, of which 90 were deposit-taking.



| Distribution of Branch Openings/Closings* |                      |                      |                                                |     |     |     |   |
|-------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|---|
| Branch Openings/Closings                  |                      |                      |                                                |     |     |     |   |
| Assessment Area                           | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |   |
|                                           |                      |                      | Low                                            | Mod | Mid | Upp | N |
| Columbus CSA                              | 1                    | 5                    | 0                                              | -1  | -4  | 1   | 0 |
| Cleveland CSA                             | 1                    | 13                   | 0                                              | -1  | -9  | -2  | 0 |
| Dayton CSA                                | 2                    | 12                   | 0                                              | -3  | -7  | 0   | 0 |
| Lima CSA                                  | 0                    | 1                    | 0                                              | 0   | -1  | 0   | 0 |
| Toledo CSA                                | 0                    | 6                    | -1                                             | 0   | -4  | -1  | 0 |
| OH, Non-MSA                               | 0                    | 3                    | 0                                              | -1  | -2  | 0   | 0 |

\* The tables present 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 generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Columbus CSA, the bank opened one branch during the evaluation period in an upper-income geography, and closed five branches, one which was in a moderate-income geography. Branch closures resulted from lower market activity and demand with several branches consolidated into nearby locations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Average hours at branches in low- and moderate-income geographies were comparable to branches in middle- and upper income geographies.

## Community Development Services

The institution was a leader in providing CD services.

Bank employees provided 366 qualified CD service activities to over 100 organizations logging 9,764 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 181 of these activities with employees providing 4,122 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and affordable housing needs.

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

- An employee served as board president of an affordable housing organization. The employee provided over 240 hours of service.
- Bank staff provided 68 financial education programs, including 28 YBC sessions to 1,100 students.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Toledo CSA and OH Non-MSA AAs is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Cleveland CSA, Dayton CSA, and Lima CSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope areas due to weaker branch distribution. Performance in the limited-scope areas lowered the Service Test rating in Ohio.

## State of South Carolina

**CRA rating for the State of South Carolina:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of loans and the overall distribution of loans by borrower income and businesses of different sizes were adequate given the limited branch presence and short evaluation period.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were reasonably accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in South Carolina

FTB entered the state of South Carolina in September 2020 with the opening of one branch in Greenville, SC. The bank delineated a portion of the Greenville-Anderson, SC (Greenville) MSA to include Greenville County as its AA.

South Carolina was FTB's smallest rating area based on total deposits. The bank had one branch, \$6.2 million in deposits, and very minimal deposit market share. The bank ranked last of 30 FDIC-insured banks operating in the AA, given its recent entry into the state. The top three banks and their deposit market share were Wells Fargo Bank, N.A. (16.6 percent), Truist Bank (16.2 percent), and Bank of America, N.A. (12.1 percent). During the evaluation period, the bank made \$80.4 million or 0.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Greenville MSA

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

**Table A – Demographic Information of the Assessment Area****Assessment Area: Greenville MSA**

| <b>Demographic Characteristics</b>                              | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
|-----------------------------------------------------------------|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                     | 111      | 9.9                   | 22.5                         | 34.2                     | 33.3                    | 0.0                   |
| Population by Geography                                         | 474,903  | 6.8                   | 17.3                         | 35.9                     | 40.1                    | 0.0                   |
| Housing Units by Geography                                      | 199,369  | 7.0                   | 18.3                         | 36.0                     | 38.7                    | 0.0                   |
| Owner-Occupied Units by Geography                               | 118,621  | 3.9                   | 13.9                         | 36.4                     | 45.9                    | 0.0                   |
| Occupied Rental Units by Geography                              | 61,241   | 11.8                  | 25.6                         | 34.8                     | 27.7                    | 0.0                   |
| Vacant Units by Geography                                       | 19,507   | 10.5                  | 22.8                         | 37.1                     | 29.6                    | 0.0                   |
| Businesses by Geography                                         | 39,059   | 6.9                   | 14.8                         | 32.0                     | 46.3                    | 0.0                   |
| Farms by Geography                                              | 849      | 4.0                   | 12.2                         | 42.3                     | 41.5                    | 0.0                   |
| Family Distribution by Income Level                             | 120,620  | 21.1                  | 15.2                         | 18.1                     | 45.5                    | 0.0                   |
| Household Distribution by Income Level                          | 179,862  | 22.8                  | 14.9                         | 15.8                     | 46.5                    | 0.0                   |
| Median Family Income MSA - 24860<br>Greenville-Anderson, SC MSA |          | \$58,097              | Median Housing Value         |                          |                         | \$159,446             |
|                                                                 |          |                       | Median Gross Rent            |                          |                         | \$776                 |
|                                                                 |          |                       | Families Below Poverty Level |                          |                         | 11.8%                 |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

According to Moody's Analytics, Greenville's recovery is gathering momentum. Job growth edged higher, outpacing the U.S. average in November 2021 for the first time since February. Key professional/business services and healthcare sectors have headlined job gains, though retrenching by goods-producing industries and leisure/hospitality offset some of the gains. The unemployment rate is the lowest in the state despite the steady flow of workers entering the labor force. Top employers include Prisma Health, Michelin North America, Clemson University, and Milliken & Company.

Favorable demographics will power robust job gains in healthcare in the years ahead. Despite the damage caused by the pandemic, Greenville's healthcare sector has performed exceptionally well, recovering 85 percent of its recessionary job losses compared with only 73 percent nationally. Greenville's healthcare system will still face stress from the pandemic well into 2022, but the metro area's rapidly expanding population will ensure healthcare providers continue to add staff. Over the next decade, Greenville's fastest growing cohort will be those age 65 and older. Growth in this cohort, the primary consumers of health services, will increase demand for a wide range of medical services.

The housing market is providing growth, with strong demand and limited supply fueling a rapid pace of new home construction. The metro area's single-family housing market has been strong, with housing starts on pace for one of their best years on record. Rising mortgage rates and housing costs in the coming quarters will drag demand, but above-average population growth will generate plenty of demand to keep builders busy for years to come.

## Scope of Evaluation in South Carolina

The Greenville MSA received a full-scope review. The bank entered the South Carolina market in September 2020. The evaluation period consists of one year, from January 1, 2021, to December 31, 2021. Performance in this area was given minimal weight, given the one year of data.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

The bank's performance under the Lending Test in South Carolina is rated Low Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville MSA AA was adequate, given the brief evaluation period for performance.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans |               |                |            |                       |       |
|-----------------|---------------|----------------|------------|-----------------------|-------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total |
| Greenville MSA  | 268           | 32             | 0          | 0                     | 300   |
| Total           | 268           | 32             | 0          | 0                     | 300   |

| Dollar Volume of Loans (\$000s) |               |                |            |                       |        |
|---------------------------------|---------------|----------------|------------|-----------------------|--------|
| Assessment Area                 | Home Mortgage | Small Business | Small Farm | Community Development | Total  |
| Greenville MSA                  | 71,754        | 8,617          | 0          | 0                     | 80,371 |
| Total                           | 71,754        | 8,617          | 0          | 0                     | 80,371 |

FTB had very minimal deposit market share. The bank ranked 30<sup>th</sup> among the 30 FDIC-insured banks, having entered the Greenville market in late 2020 and maintaining a single branch office.

The bank had market share of 0.3 percent based on the number of home mortgage loans originated or purchased and ranked 78<sup>th</sup> among 557 home mortgage lenders in the AA, which placed it in the top 15 percent of lenders. The top three lenders with a combined market share of 15 percent were Rocket Mortgage (7.5 percent), Truist Bank (4 percent), and Wells Fargo Bank, N.A. (3.5 percent).

The bank had market share of 0.1 percent based on the number of small loans to businesses originated or purchased and ranked 45<sup>th</sup> out of 151 small business lenders, which placed it in the top 31 percent of lenders. The top three lenders with a combined market share of 32.7 percent were American Express National Bank (13.9 percent), Bank of America, N.A. (9.7 percent), and Wells Fargo Bank, N.A. (9.1 percent).

### Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA given the limited branch presence and short evaluation period. For this analysis, examiners compared the bank's public data of HMDA and small

loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

### ***Home Mortgage Loans***

Refer to Table O in the state of South Carolina 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

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

### ***Small Loans to Businesses***

Refer to Table Q in the state of South Carolina 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low- and moderate-income geographies exceeded the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout 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 of different sizes, given the limited branch presence and short evaluation period.

### ***Home Mortgage Loans***

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but near the aggregate distribution of loans by all lenders. The percentage of home

mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate, given the limited branch presence and short evaluation period.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 28.1 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 the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank made no CD loans. CD lending had minimal effect on the Lending Test in South Carolina, given the limited branch presence and length of the evaluation period in which the bank operated in the AA. The Lending Activity Tables, shown above, set forth 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.

### **Product Innovation and Flexibility**

The bank made limited use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 10 loans under flexible lending programs specific to the AA totaling \$2.3 million. Program volumes included eight FHA loans totaling \$1.7 million and two VA loans totaling \$587,000. Refer to the Flexible and Innovative Lending Programs discussed earlier in this evaluation for a description of the individual programs.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in South Carolina is rated Low Satisfactory.

Based on a full-scope review, FTB's performance in South Carolina was adequate, given the limited branch presence and short evaluation period.

### **Number and Amount of Qualified Investments**

The institution had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments |               |          |                |          |       |              |          |               |                        |          |
|-----------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area       | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                       | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Greenville MSA        | 0             | 0        | 2              | 15       | 2     | 100.0        | 15       | 100.0         | 0                      | 0        |

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

FTB made two donations totaling \$15,000 to an organization that distributes food to low- and moderate-income residents at risk of hunger and malnutrition. The dollar volume of current period investments represented 2.5 percent of allocated tier 1 capital.

The institution exhibits adequate responsiveness to credit and community economic development needs. By dollar volume, 100 percent of funded community services were provided to low- and moderate-income individuals. The institution did not use innovative and/or complex investments to support CD initiatives.

## SERVICE TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville MSA AA was adequate.

## Retail Banking Services

| Distribution of Branch Delivery System |                                |                    |                                |                                                   |     |     |     |     |                                       |      |      |      |     |
|----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|-----|-----|-----|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Greenville MSA                         | 100.0                          | 1                  | 100.0                          | 100.0                                             | 0.0 | 0.0 | 0.0 | 0.0 | 6.8                                   | 17.3 | 35.9 | 40.1 | 0.0 |

\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA, giving consideration that the bank opened its one branch in late 2020. The branch was opened in a low-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had two ATMs in the AA, one which was deposit-taking.

| Distribution of Branch Openings/Closings |                      |                      |                                                |     |     |     |    |
|------------------------------------------|----------------------|----------------------|------------------------------------------------|-----|-----|-----|----|
| Branch Openings/Closings                 |                      |                      |                                                |     |     |     |    |
| Assessment Area                          | # of Branch Openings | # of Branch Closings | Net change in Location of Branches<br>(+ or -) |     |     |     |    |
|                                          |                      |                      | Low                                            | Mod | Mid | Upp | NA |
| Greenville MSA                           | 1                    | 0                    | 1                                              | 0   | 0   | 0   | 0  |

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened one branch in a low-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The branch was open an average of 45 hours per week.

### **Community Development Services**

The institution provided few if any CD services.



## State of Tennessee

**CRA rating for the State of Tennessee:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution and the overall distribution of loans by borrower income and businesses of different sizes were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- The bank's branches were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

## Description of Institution's Operations in Tennessee

FTB delineated two AAs in the state of Tennessee. They include a portion of the Nashville-Davidson-Murfreesboro-Franklin MSA (Nashville MSA) and a portion of the Knoxville MSA. Refer to the table in appendix A for a list of the counties reviewed.

Tennessee was FTB's ninth largest rating area based on total deposits. The bank had approximately \$3.6 billion in deposits, representing 2.1 percent of its total deposits. The combined areas were served by 69 FDIC-insured banks operating 572 branches. FTB ranked seventh with 3.8 percent deposit market share. The top three banks and their deposit market share include Pinnacle Bank (16.7 percent), Bank of America, N.A. (15.8 percent), and Regions Bank (12.5 percent). FTB operated 40 branches and 48 ATMs in the combined areas. During the evaluation period, the bank made \$1.5 billion or 2.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

### Nashville MSA

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

**Table A – Demographic Information of the Assessment Area****Assessment Area: Nashville MSA**

| <b>Demographic Characteristics</b>                                                  | <b>#</b>  | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
|-------------------------------------------------------------------------------------|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts)                                                         | 289       | 10.4                  | 22.1                         | 35.6                     | 30.1                    | 1.7                   |
| Population by Geography                                                             | 1,310,143 | 7.8                   | 22.4                         | 36.5                     | 32.9                    | 0.4                   |
| Housing Units by Geography                                                          | 537,903   | 8.2                   | 23.1                         | 36.7                     | 31.9                    | 0.1                   |
| Owner-Occupied Units by Geography                                                   | 311,045   | 3.8                   | 15.8                         | 39.7                     | 40.6                    | 0.1                   |
| Occupied Rental Units by Geography                                                  | 185,730   | 14.3                  | 34.1                         | 32.5                     | 19.0                    | 0.0                   |
| Vacant Units by Geography                                                           | 41,128    | 13.4                  | 28.4                         | 33.3                     | 24.8                    | 0.1                   |
| Businesses by Geography                                                             | 160,700   | 7.8                   | 18.3                         | 27.6                     | 45.3                    | 0.9                   |
| Farms by Geography                                                                  | 3,172     | 4.5                   | 14.5                         | 36.8                     | 43.6                    | 0.6                   |
| Family Distribution by Income Level                                                 | 318,234   | 20.0                  | 16.7                         | 19.8                     | 43.5                    | 0.0                   |
| Household Distribution by Income Level                                              | 496,775   | 22.1                  | 16.5                         | 18.0                     | 43.4                    | 0.0                   |
| Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA |           | \$66,441              | Median Housing Value         |                          |                         | \$213,057             |
|                                                                                     |           |                       | Median Gross Rent            |                          |                         | \$914                 |
|                                                                                     |           |                       | Families Below Poverty Level |                          |                         | 9.9%                  |

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%.

(\*) The NA category consists of geographies that have not been assigned an income classification.

In the performance context, the OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table, low-income families earned less than \$33,221 and moderate-income families earned less than \$53,153. The median housing value in the AA is \$213,057. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$831 for a low-income borrower and \$1,329 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,205. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.9 percent of families were living below the poverty level.

## Economic Data

According to Moody's Analytics, manufacturing, state government, and tourism are key economic drivers. The metropolitan area had significant strengths coming out of the COVID-19 pandemic including a favorable business tax structure, a large concentration of prime-age workers, and net migration into the area. As such, housing prices have accelerated and are some of the highest of southern metro areas. Supply chain shortages with semiconductor shortages have disrupted the economy, including auto manufacturing plants. The return of

tourism should bolster the local economy. Major employers include Vanderbilt University Medical Center, Nissan North America, HCA Inc., Vanderbilt University, and Saint Thomas Health Services.

The unemployment rate for the Nashville MSA area was 2.7 percent as of December 2021 and the national unemployment rate was 3.7 percent.

## Community Contacts

The OCC reviewed three community contacts made during the evaluation period as part of the CRA examination. Two contacts worked at economic development agencies, while the other worked at an organization focused on affordable housing. Contacts expressed that the MSA has experienced considerable growth over the past few years, making it one of the robust local economies not only in Tennessee, but the entire United States. This has led to appreciating real estate and home prices in the area. All three contacts indicated the primary and most pressing need in the MSA is affordable housing. Contacts also expressed secondary needs in the MSA associated with challenges in the housing space. The greatest needs include:

- Affordable housing.
- Rapid re-housing programs that move people quickly back into housing.
- Volunteers and grants to assist homeless shelters.

## Scope of Evaluation in Tennessee

The Nashville MSA received a full-scope review. This AA represented 97 percent of deposits and 92 percent of lending in the rating area. The Knoxville MSA received a limited-scope review. FTB did not originate or purchase enough small loans to farms in the state of Tennessee to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

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

## LENDING TEST

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* |               |                |            |                       |       |                |                  |
|------------------|---------------|----------------|------------|-----------------------|-------|----------------|------------------|
| Assessment Area  | Home Mortgage | Small Business | Small Farm | Community Development | Total | % State* Loans | % State Deposits |
| Nashville MSA    | 5,089         | 2,264          | 8          | 25                    | 7,386 | 91.9           | 97.0             |
| Knoxville MSA    | 486           | 163            | 0          | 2                     | 651   | 8.1            | 3.0              |
| Total            | 5,575         | 2,427          | 8          | 27                    | 8,037 | 100.0          | 100.0            |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

| <b>Dollar Volume of Loans* (\$000s)</b> |                  |                |            |                       |                  |                |                  |
|-----------------------------------------|------------------|----------------|------------|-----------------------|------------------|----------------|------------------|
| Assessment Area                         | Home Mortgage    | Small Business | Small Farm | Community Development | Total            | % State* Loans | % State Deposits |
| Nashville MSA                           | 1,277,480        | 133,391        | 144        | 116,274               | 1,527,289        | 91.1           | 97.0             |
| Knoxville MSA                           | 99,250           | 17,080         | 0          | 32,167                | 148,497          | 8.9            | 3.0              |
| <b>Total</b>                            | <b>1,376,730</b> | <b>150,471</b> | <b>144</b> | <b>148,441</b>        | <b>1,675,786</b> | <b>100.0</b>   | <b>100.0</b>     |

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

FTB had deposit market share of 4.5 percent and ranked seventh among 56 depository financial institutions placing it in the top 13 percent of banks.

The bank had a market share of 1.1 percent based on the number of home mortgage loans originated or purchased and ranked 25<sup>th</sup> among 866 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 12.2 percent were Rocket Mortgage (5.7 percent), U.S. Bank, N.A. (3.4 percent), and FirstBank (3.1 percent).

The bank had a market share of 2.1 percent based on the number of small loans to businesses originated or purchased and ranked 12<sup>th</sup> out of 248 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 35.6 percent were American Express National Bank (13.7 percent), Pinnacle Bank (11.1 percent), and First Horizon Bank (10.8 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's public data of HMDA and small loans to businesses with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Tennessee 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied homes in low-income geographies but was below the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Tennessee 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of loans by all lenders. The percentage of small loans to businesses in moderate-income geographies equaled the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans by all lenders.

### ***Lending Gap Analysis***

Examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

Refer to Table P in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

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 by all lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate distribution of loans by all lenders.

### ***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 20.3 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 below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distributions of small loans to businesses by all lenders.

### **Community Development Lending**

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test in Tennessee.

The Lending Activity Tables, shown above, set forth 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 25 CD loans totaling nearly \$116.3 million, which represented 32.9 percent of allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 26.7 percent of these loans funded affordable housing, 14.2 percent funded economic development, 29.7 percent funded revitalization and stabilization efforts, and 29.4 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- \$17.5 million loan to develop 147 units of workforce housing in Nashville, TN. The project also received LIHTC financing through the Tennessee Housing and Development Agency and a \$2 million contribution from a local housing trust fund.
- \$7.2 million PPP loan to a medical facility located in a low-income geography to allow it to fund critical business operations.
- \$70,000 loan to a local CDC that provides affordable rental housing units and builds and rehabs housing for low- and moderate-income families in Davidson County. The CDC is a HUD certified housing counseling agency, which enables individuals to access down payment assistance programs and special mortgage products through homebuyer education classes.

## **Product Innovation and Flexibility**

The bank used innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 154 loans under flexible lending programs specific to the AA totaling \$35.8 million. Program volumes included 74 FHA loans totaling \$17 million, 29 Freddie Mac HP loans totaling \$6.8 million, one Freddie Mac RP loan totaling \$144,000, 11 Fannie Mae HR loans totaling \$2.5 million, one USDA/RA loan totaling \$218,000, and 38 VA loans totaling \$9.2 million.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Knoxville MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Tennessee section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in Tennessee is rated Low Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the FTB's performance in the Nashville MSA was adequate. Performance in the limited-scope area had a minimal effect on the Investment Test rating in Tennessee.

## Number and Amount of Qualified Investments

The institution had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

| Qualified Investments* |               |          |                |          |       |              |          |               |                        |          |
|------------------------|---------------|----------|----------------|----------|-------|--------------|----------|---------------|------------------------|----------|
| Assessment Area        | Prior Period* |          | Current Period |          | Total |              |          |               | Unfunded Commitments** |          |
|                        | #             | \$(000s) | #              | \$(000s) | #     | % of Total # | \$(000s) | % of Total \$ | #                      | \$(000s) |
| Nashville MSA          | 7             | 8,802    | 179            | 15,263   | 186   | 86.9         | 24,065   | 71.8          | 7                      | 1,441    |
| Knoxville MSA          | 2             | 101      | 26             | 9,351    | 28    | 13.1         | 9,452    | 28.2          | 0                      | 0        |
| Total                  | 9             | 8,903    | 205            | 24,614   | 214   | 100.0        | 33,517   | 100.0         | 7                      | 1,441    |

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

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

\*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 179 investments totaling \$15.2 million during the evaluation period to nearly 80 organizations/projects. The dollar volume of current and prior period investments represented 6.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to identified community development needs for affordable housing and community services to low- and moderate-income individuals. By dollar volume, 90 percent of investments supported affordable housing, six percent funded community services to low- and moderate-income individuals, three percent supported economic development and, one percent supported revitalization and stabilization efforts. The institution used innovative and/or complex investments to support CD initiatives. FTB made LIHTC investments in the current period, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- \$12.4 million investment to support development of a new 60-unit LIHTC complex in Lascassas, TN.
- Multiple investments totaling \$1.1 million in a qualified CRA affordable housing fund for properties located in Nashville.
- \$33,000 investment served as seed money to establish a micro business recovery fund that will provide grants of \$5,000 to \$25,000 to businesses with four or fewer employees and grants of \$30,000 to \$100,000 to businesses with fifty or fewer employees in low- and moderate-income areas of Nashville that have been severely impacted by COVID-19.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Knoxville MSA AA was stronger than the bank's overall performance under the Investment Test in the full-scope area. Stronger performance was a result of higher level of investments relative to the AA. Performance in the limited-scope area had a minimal effect on the Investment Test rating in Tennessee.

## SERVICE TEST

The bank's performance under the Service Test in Tennessee is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

## Retail Banking Services

| Distribution of Branch Delivery System* |                                |                    |                                |                                                   |      |       |      |     |                                       |      |      |      |     |
|-----------------------------------------|--------------------------------|--------------------|--------------------------------|---------------------------------------------------|------|-------|------|-----|---------------------------------------|------|------|------|-----|
| 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  |
| Nashville MSA                           | 97                             | 38                 | 95                             | 5.3                                               | 21.1 | 21.1  | 52.6 | 0.0 | 7.8                                   | 22.4 | 36.5 | 32.9 | 0.4 |
| Knoxville MSA                           | 3                              | 2                  | 5                              | 0.0                                               | 0.0  | 100.0 | 0.0  | 0.0 | 6.5                                   | 16.6 | 39.1 | 36.5 | 1.3 |

\* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*Totals may not equal 100.0 percent due to rounding.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners gave positive consideration for two branches in middle- and upper income geographies that were on the opposite side of the street from a low- or moderate-income geography.

The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 120 ATMs in the AA, of which 46 were deposit-taking.

| 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 |
| Nashville MSA                             | 6                    | 1                    | 0                                           | 0   | 1   | 4   | 0  |
| Knoxville MSA                             | 0                    | 1                    | 0                                           | 0   | -1  | 0   | 0  |

\* The tables present 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 did not adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened six branches and closed one branch, all in middle- and upper income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours for branches in low- and moderate-income geographies were the same compared to branches in middle- and upper income geographies.



## **Community Development Services**

The institution was a leader in providing CD services.

Bank employees provided 228 qualified CD service activities to 25 organizations logging 3,379 qualified hours within the AA during the evaluation period. Leadership is evident through Board or committee participation in 104 of these activities with 24 employees providing 1,291 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with respect to community service and affordable housing needs.

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

- An employee served on the board and executive committee and chaired the finance committee of an organization that provides transitional housing and support to individuals recently released from incarceration. The employee provided 120 hours of service.
- Bank staff provided 63 financial education programs, which included three YBC sessions for nearly 100 students.

## **Conclusions for the Area Receiving Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Knoxville MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution. Performance in the limited-scope review had a minimal effect on the Service Test rating for the state of Tennessee.

## 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.”

|                                                         |                                                                                                                               |                                                                                                                                                                             |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Time Period Reviewed:</b>                            | 01/01/2017 to 12/31/2021                                                                                                      |                                                                                                                                                                             |
| <b>Bank Products Reviewed:</b>                          | Home mortgage, small business, small farm, community development loans, qualified investments, community development services |                                                                                                                                                                             |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>                                                                                                 | <b>Products Reviewed</b>                                                                                                                                                    |
| Fifth Third Community Development Corporation           | wholly owned, indirect subsidiary of bank                                                                                     | CD loans and qualified investments                                                                                                                                          |
| Fifth Third Foundation                                  | Bank subsidiary                                                                                                               | Qualified investments (grants/donations)                                                                                                                                    |
| <b>List of Assessment Areas and Type of Examination</b> |                                                                                                                               |                                                                                                                                                                             |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>                                                                                                           | <b>Other Information</b>                                                                                                                                                    |
| <b>MMSAs</b>                                            |                                                                                                                               |                                                                                                                                                                             |
| Charleston CSA                                          | Full-Scope                                                                                                                    | KY: Boyd County<br>OH: Non-MSA County: Scioto<br>WV: Cabell, Putnam, Wayne; Charleston MSA #16620 (Kanawha County)                                                          |
| Chicago CSA                                             | Full-Scope                                                                                                                    | IL: Cook, DuPage, McHenry Will, DeKalb, Kane, Kendall, Lake Counties<br>IN: Jasper, Lake, and Porter Counties; Michigan City MSA #33140 (La Porte County)                   |
| Cincinnati CSA                                          | Full-Scope                                                                                                                    | IN: Dearborn County<br>KY: Boone, Campbell, Grant, Kenton, and Pendleton Counties<br>OH: Brown, Butler, Clermont, Hamilton, and Warren Counties; OH Non-MSA County: Clinton |
| Evansville MMSA                                         | Full-Scope                                                                                                                    | IN: Posey, Vanderburgh, and Warrick Counties<br>KY: Henderson County                                                                                                        |
| Louisville MMSA                                         | Full-Scope                                                                                                                    | IN: Clark and Floyd Counties<br>KY: Jefferson, Oldham, and Shelby Counties                                                                                                  |
| South Bend CSA                                          | Full-Scope                                                                                                                    | IN: South Bend MSA #43780 (St. Joseph County); Elkhart MSA #21140 (Elkhart County)<br>MI: Niles MSA #35660 (Berrien County); South Bend MSA #43780 (Cass County)            |
| <b>STATES</b>                                           |                                                                                                                               |                                                                                                                                                                             |
| <b>FLORIDA</b>                                          |                                                                                                                               |                                                                                                                                                                             |
| Cape Coral CSA                                          | Limited-Scope                                                                                                                 | Cape Coral MSA #15980 (Lee County); Naples MSA #34940 (Collier County)                                                                                                      |
| Jacksonville MSA                                        | Limited-Scope                                                                                                                 | Clay, Duval, and St. Johns Counties                                                                                                                                         |
| Miami MSA                                               | Limited-Scope                                                                                                                 | Broward, Miami-Dade, and Palm Beach Counties                                                                                                                                |
| North Port CSA                                          | Limited-Scope                                                                                                                 | North Port MSA #35840 (Manatee and Sarasota Counties); Punta Gorda MSA #39460 (Charlotte County)                                                                            |
| Orlando CSA                                             | Limited-Scope                                                                                                                 | Orlando MSA #36740 (Lake, Orange, Osceola, and Seminole Counties); Deltona MSA #19660 (Volusia County); Lakeland MSA #29460 (Polk County)                                   |
| Tampa MSA                                               | Full-Scope                                                                                                                    | Hillsborough, Pasco, and Pinellas Counties                                                                                                                                  |

| List of Assessment Areas and Type of Examination |               |                                                                                                                                                                                                                         |
|--------------------------------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rating and Assessment Areas                      | Type of Exam  | Other Information                                                                                                                                                                                                       |
| <b>GEORGIA</b>                                   |               |                                                                                                                                                                                                                         |
| Atlanta MSA                                      | Full-Scope    | Cobb, De Kalb, Forsyth, Fulton, Gwinnett, and Walton Counties                                                                                                                                                           |
| Augusta MSA                                      | Limited-Scope | Columbia and Richmond Counties                                                                                                                                                                                          |
| <b>ILLINOIS</b>                                  |               |                                                                                                                                                                                                                         |
| Carbondale MSA                                   | Limited-Scope | Williamson County                                                                                                                                                                                                       |
| Rockford CSA                                     | Limited-Scope | Rockford MSA #40420 (Winnebago County), IL Non-MSA County: Stephenson                                                                                                                                                   |
| IL Non-MSA                                       | Full-Scope    | Effingham, Jefferson, and Whiteside Counties                                                                                                                                                                            |
| <b>INDIANA</b>                                   |               |                                                                                                                                                                                                                         |
| Bloomington MSA                                  | Limited-Scope | Monroe County                                                                                                                                                                                                           |
| Fort Wayne CSA                                   | Limited-Scope | Fort Wayne MSA #23060 (Allen County); IN Non-MSA Counties: Adams and Steuben                                                                                                                                            |
| Indianapolis CSA                                 | Full-Scope    | Columbus MSA# 18020 (Bartholomew County); Indianapolis MSA #26900 (Brown, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby Counties); IN Non-MSA County: Decatur                                       |
| Lafayette MSA                                    | Limited-Scope | Tiptecanoe County                                                                                                                                                                                                       |
| Terre-Haute MSA                                  | Limited-Scope | Clay, Parke, Vermillion, and Vigo Counties                                                                                                                                                                              |
| IN Non-MSA                                       | Limited-Scope | Dubois, Fayette, Gibson, Knox, Orange, Perry, Ripley, Spencer, and Sullivan Counties                                                                                                                                    |
| <b>KENTUCKY</b>                                  |               |                                                                                                                                                                                                                         |
| Lexington MSA                                    | Full-Scope    | Lexington MSA #30460 (Bourbon, Fayette, Jessamine, Scott Counties); KY Non-MSA Counties: Franklin and Madison                                                                                                           |
| Owensboro MSA                                    | Limited-Scope | Daviess County                                                                                                                                                                                                          |
| KY Non-MSA                                       | Limited-Scope | Harrison, Hopkins, Lyon, Mercer, and Union Counties                                                                                                                                                                     |
| <b>MICHIGAN</b>                                  |               |                                                                                                                                                                                                                         |
| Detroit CSA                                      | Full-Scope    | Ann Arbor MSA #11460 (Washtenaw County); Detroit MD #19804 (Wayne County); Flint MSA #22420 (Genesee County); Monroe MSA #33780 (Monroe County); Warren MD #47664 (Livingston, Macomb, Oakland, and St. Clair Counties) |
| Grand Rapids CSA                                 | Limited-Scope | Grand Rapids MSA #24340 (Kent, Montcalm, and Ottawa Counties); Muskegon MSA #34740 (Muskegon County); MI Non-MSA Counties: Allegan, Mecosta                                                                             |
| Jackson MSA                                      | Limited-Scope | Jackson County                                                                                                                                                                                                          |
| Kalamazoo CSA                                    | Limited-Scope | Battle Creek MSA #12980 (Calhoun County); Kalamazoo MSA#28020 (Kalamazoo County); MI Non-MSA County: St. Joseph County                                                                                                  |
| Lansing MSA                                      | Limited-Scope | Lansing MSA #29620 (Clinton, Eaton, Ingham, and Shiawassee Counties)                                                                                                                                                    |
| Saginaw CSA                                      | Limited-Scope | Bay City MSA #13020 (Bay County); Midland MSA #33320 (Midland County); Saginaw MSA #40980 (Saginaw County)                                                                                                              |
| MI Non-MSA                                       | Limited-Scope | Antrim, Emmet, Grand Traverse, Hillsdale, Isabella, Leelanau, Mason, Missaukee, Newaygo, Oceana, Otsego, Van Buren, and Wexford Counties                                                                                |
| <b>NORTH CAROLINA</b>                            |               |                                                                                                                                                                                                                         |
| Asheville CSA                                    | Limited-Scope | Asheville MSA #11700 (Buncombe County); NC Non-MSA Counties: McDowell and Transylvania Counties                                                                                                                         |

| <b>List of Assessment Areas and Type of Examination</b> |                     |                                                                                                                                                                                        |
|---------------------------------------------------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b> | <b>Other Information</b>                                                                                                                                                               |
| Charlotte CSA                                           | Full-Scope          | Charlotte MSA #16740 (Cabarrus, Iredell, Lincoln, Mecklenburg, Rowan, and Union Counties); NC Non-MSA County: Cleveland                                                                |
| Hickory MSA                                             | Limited-Scope       | Catawba County                                                                                                                                                                         |
| Raleigh CSA                                             | Limited-Scope       | Durham MSA #20500 (Durham and Orange Counties); Raleigh MSA #39580 (Wake County)                                                                                                       |
| NC Non-MSA                                              | Limited-Scope       | Alleghany, Ashe, Avery, and Rutherford Counties                                                                                                                                        |
| <b>OHIO</b>                                             |                     |                                                                                                                                                                                        |
| Cleveland CSA                                           | Limited-Scope       | Akron MSA #10420 (Portage and Summit Counties); Canton MSA #15940 (Starke County); Cleveland MSA #17460 (Cuyahoga, Geauga, Lake, Lorain, and Medina Counties); OH Non-MSA County: Erie |
| Columbus CSA                                            | Full-Scope          | Columbus MSA #18140 (Delaware, Fairfield, Franklin, Hocking, Licking, Pickaway, and Union Counties); OH Non-MSA Counties: Fayette, Logan, Marion, and Ross                             |
| Dayton CSA                                              | Limited-Scope       | Dayton MSA #19430 (Greene, Miami, Montgomery Counties); Springfield MSA #44220 (Clark County); OH Non-MSA Counties: Champaign, Darke, and Shelby                                       |
| Lima CSA                                                | Limited-Scope       | Lima MSA #30620 (Allen County); OH Non-MSA County: Auglaize                                                                                                                            |
| Toledo CSA                                              | Limited-Scope       | Toledo MSA #45780 (Fulton, Lucas, and Wood Counties); OH Non-MSA Counties: Hancock, Sandusky, Seneca                                                                                   |
| OH Non-MSA                                              | Limited-Scope       | Adams, Athens, Defiance, Highland, Pike, and Preble Counties                                                                                                                           |
| <b>SOUTH CAROLINA</b>                                   |                     |                                                                                                                                                                                        |
| Greenville MSA                                          | Full-Scope          | Greenville County                                                                                                                                                                      |
| <b>TENNESSEE</b>                                        |                     |                                                                                                                                                                                        |
| Knoxville MSA                                           | Limited-Scope       | Knox County                                                                                                                                                                            |
| Nashville MSA                                           | Full-Scope          | Davidson, Rutherford, Sumner, and Williamson Counties                                                                                                                                  |

## Appendix B: Summary of MMSA and State Ratings

| RATINGS Fifth Third Bank, National Association |                             |                               |                            |                                             |
|------------------------------------------------|-----------------------------|-------------------------------|----------------------------|---------------------------------------------|
|                                                | <b>Lending Test Rating*</b> | <b>Investment Test Rating</b> | <b>Service Test Rating</b> | <b>Overall Bank/State/Multistate Rating</b> |
| Overall Bank:                                  | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| MMSA or State:                                 |                             |                               |                            |                                             |
| Charleston CSA                                 | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| Chicago CSA                                    | Outstanding                 | Outstanding                   | High Satisfactory          | Outstanding                                 |
| Cincinnati CSA                                 | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| Evansville MMSA                                | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| Louisville MMSA                                | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| South Bend CSA                                 | Outstanding                 | Outstanding                   | High Satisfactory          | Outstanding                                 |
| Florida                                        | Outstanding                 | Outstanding                   | High Satisfactory          | Outstanding                                 |
| Georgia                                        | High Satisfactory           | Outstanding                   | Outstanding                | Outstanding                                 |
| Illinois                                       | High Satisfactory           | Needs to Improve              | High Satisfactory          | Satisfactory                                |
| Indiana                                        | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| Kentucky                                       | Outstanding                 | High Satisfactory             | Outstanding                | Outstanding                                 |
| Michigan                                       | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| North Carolina                                 | Outstanding                 | Outstanding                   | Outstanding                | Outstanding                                 |
| Ohio                                           | Outstanding                 | Outstanding                   | High Satisfactory          | Outstanding                                 |
| South Carolina                                 | Low Satisfactory            | Low Satisfactory              | Low Satisfactory           | Satisfactory                                |
| Tennessee                                      | Outstanding                 | Low Satisfactory              | Outstanding                | 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 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):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male

householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §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 investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

**MMSA (state):** 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.

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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



## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) 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 U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |         |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |         |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$      | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Charleston CSA                                                                                                                                           | 2,038                     | 249,188 | 100.0      | 14,469         | 2.2                               | 1.1          | 1.7       | 14.3                              | 14.1         | 10.2      | 52.2                              | 49.1         | 47.3      | 31.2                              | 35.7         | 40.8      | 0.0                               | 0.0          | 0.1       |
| Total                                                                                                                                                    | 2,038                     | 249,188 | 100.0      | 14,469         | 2.2                               | 1.1          | 1.7       | 14.3                              | 14.1         | 10.2      | 52.2                              | 49.1         | 47.3      | 31.2                              | 35.7         | 40.8      | 0.0                               | 0.0          | 0.1       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |         |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                           |                           |         |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                          | Total Home Mortgage Loans |         |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                           | #                         | \$      | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Charleston CSA                                                                                                                                            | 2,038                     | 249,188 | 100.0      | 14,469         | 22.5                 | 7.8          | 6.1       | 16.6                      | 17.4         | 16.0      | 19.5                    | 23.2         | 20.8      | 41.4                   | 48.8         | 40.8      | 0.0                            | 2.8          | 16.3      |
| Total                                                                                                                                                     | 2,038                     | 249,188 | 100.0      | 14,469         | 22.5                 | 7.8          | 6.1       | 16.6                      | 17.4         | 16.0      | 19.5                    | 23.2         | 20.8      | 41.4                   | 48.8         | 40.8      | 0.0                            | 2.8          | 16.3      |
| Source: 2015 ACS ; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |         |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |        |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |        |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$     | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Charleston CSA                                                                                                                                               | 582                             | 64,605 | 100.0      | 8,485          | 8.3               | 8.4          | 10.1      | 14.9                   | 17.7         | 15.0      | 46.3                 | 40.9         | 44.7      | 30.2                | 33.0         | 30.2      | 0.3                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 582                             | 64,605 | 100.0      | 8,485          | 8.3               | 8.4          | 10.1      | 14.9                   | 17.7         | 15.0      | 46.3                 | 40.9         | 44.7      | 30.2                | 33.0         | 30.2      | 0.3                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |        |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |               |              |                |                                   |              |             |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$            | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Charleston CSA                                                                                                                                               | 582                             | 64,605        | 100.0        | 8,485          | 80.1                              | 58.6         | 32.2        | 5.2                              | 27.3         | 14.6                                   | 14.1         |
| <b>Total</b>                                                                                                                                                 | <b>582</b>                      | <b>64,605</b> | <b>100.0</b> | <b>8,485</b>   | <b>80.1</b>                       | <b>58.6</b>  | <b>32.2</b> | <b>5.2</b>                       | <b>27.3</b>  | <b>14.6</b>                            | <b>14.1</b>  |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |               |              |                |                                   |              |             |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |           |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |           |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                                                                              | #                    | \$        | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate   | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| Charleston CSA                                                                                                                                               | 3                    | 96        | 100.0        | 65             | 3.9               | 33.3         | 1.5        | 13.0                   | 33.3         | 10.8        | 52.0                 | 33.3         | 63.1        | 31.1                | 0.0          | 24.6        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                                 | <b>3</b>             | <b>96</b> | <b>100.0</b> | <b>65</b>      | <b>3.9</b>        | <b>33.3</b>  | <b>1.5</b> | <b>13.0</b>            | <b>33.3</b>  | <b>10.8</b> | <b>52.0</b>          | <b>33.3</b>  | <b>63.1</b> | <b>31.1</b>         | <b>0.0</b>   | <b>24.6</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |           |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              |            |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |    |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |    |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$ | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Charleston CSA                                                                                                                                               | 3                    | 96 | 100.0      | 65             | 96.6                         | 100.0        | 29.2      | 1.4                         | 0.0          | 2.0                               | 0.0          |
| Total                                                                                                                                                        | 3                    | 96 | 100.0      | 65             | 96.6                         | 100.0        | 29.2      | 1.4                         | 0.0          | 2.0                               | 0.0          |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |    |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           | 2017-21 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|---------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |         |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |         |
| Chicago CSA                                                                                                                                              | 33,383                    | 7,824,369 | 100.0      | 508,462        | 4.4                               | 3.6          | 3.0       | 17.4                              | 15.6         | 13.1      | 35.4                              | 31.1         | 33.7      | 42.7                              | 49.5         | 50.1      | 0.1                               | 0.1          | 0.1       |         |
| Total                                                                                                                                                    | 33,383                    | 7,824,369 | 100.0      | 508,462        | 4.4                               | 3.6          | 3.0       | 17.4                              | 15.6         | 13.1      | 35.4                              | 31.1         | 33.7      | 42.7                              | 49.5         | 50.1      | 0.1                               | 0.1          | 0.1       |         |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |         |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Chicago CSA                                                                                                                                              | 33,383                    | 7,824,369 | 100.0      | 508,462        | 23.3                 | 12.7         | 6.3       | 16.3                      | 17.4         | 16.3      | 18.7                    | 19.4         | 21.1      | 41.7                   | 42.1         | 39.8      | 0.0                            | 8.3          | 16.5      |
| Total                                                                                                                                                    | 33,383                    | 7,824,369 | 100.0      | 508,462        | 23.3                 | 12.7         | 6.3       | 16.3                      | 17.4         | 16.3      | 18.7                    | 19.4         | 21.1      | 41.7                   | 42.1         | 39.8      | 0.0                            | 8.3          | 16.5      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Chicago CSA                                                                                                                                                  | 25,496                          | 3,001,170 | 100.0      | 273,274        | 6.1               | 5.2          | 5.1       | 16.7                   | 15.9         | 15.7      | 29.4                 | 32.3         | 30.5      | 47.4                | 46.3         | 48.4      | 0.4                         | 0.3          | 0.3       |
| Total                                                                                                                                                        | 25,496                          | 3,001,170 | 100.0      | 273,274        | 6.1               | 5.2          | 5.1       | 16.7                   | 15.9         | 15.7      | 29.4                 | 32.3         | 30.5      | 47.4                | 46.3         | 48.4      | 0.4                         | 0.3          | 0.3       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |                  |              |                |                                   |              |             |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |                  |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$               | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Chicago CSA                                                                                                                                                  | 25,496                          | 3,001,170        | 100.0        | 273,274        | 86.9                              | 61.5         | 37.6        | 4.9                              | 24.9         | 8.3                                    | 13.6         |
| <b>Total</b>                                                                                                                                                 | <b>25,496</b>                   | <b>3,001,170</b> | <b>100.0</b> | <b>273,274</b> | <b>86.9</b>                       | <b>61.5</b>  | <b>37.6</b> | <b>4.9</b>                       | <b>24.9</b>  | <b>8.3</b>                             | <b>13.6</b>  |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |                  |              |                |                                   |              |             |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |              |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |              |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |            | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                                                                              | #                    | \$           | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate  | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| Chicago CSA                                                                                                                                                  | 67                   | 3,857        | 100.0        | 1,136          | 3.5               | 4.5          | 1.0        | 14.7                   | 10.4         | 6.3        | 40.0                 | 47.8         | 60.0        | 41.7                | 37.3         | 32.7        | 0.1                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                                 | <b>67</b>            | <b>3,857</b> | <b>100.0</b> | <b>1,136</b>   | <b>3.5</b>        | <b>4.5</b>   | <b>1.0</b> | <b>14.7</b>            | <b>10.4</b>  | <b>6.3</b> | <b>40.0</b>          | <b>47.8</b>  | <b>60.0</b> | <b>41.7</b>         | <b>37.3</b>  | <b>32.7</b> | <b>0.1</b>                  | <b>0.0</b>   | <b>0.0</b> |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |              |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              |            |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Chicago CSA                                                                                                                                                  | 67                   | 3,857 | 100.0      | 1,136          | 94.9                         | 79.1         | 56.9      | 3.1                         | 6.0          | 2.0                               | 14.9         |
| Total                                                                                                                                                        | 67                   | 3,857 | 100.0      | 1,136          | 94.9                         | 79.1         | 56.9      | 3.1                         | 6.0          | 2.0                               | 14.9         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Cincinnati CSA                                                                                                                                           | 31,923                    | 4,667,869 | 100.0      | 133,926        | 3.8                               | 3.3          | 3.2       | 16.4                              | 14.4         | 14.1      | 43.6                              | 40.6         | 42.0      | 36.0                              | 41.7         | 40.6      | 0.1                               | 0.1          | 0.1       |
| Total                                                                                                                                                    | 31,923                    | 4,667,869 | 100.0      | 133,926        | 3.8                               | 3.3          | 3.2       | 16.4                              | 14.4         | 14.1      | 43.6                              | 40.6         | 42.0      | 36.0                              | 41.7         | 40.6      | 0.1                               | 0.1          | 0.1       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                           |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                          | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                           | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Cincinnati CSA                                                                                                                                            | 31,923                    | 4,667,869 | 100.0      | 133,926        | 22.1                 | 13.8         | 7.8       | 16.8                      | 20.5         | 19.0      | 20.0                    | 20.6         | 21.0      | 41.2                   | 34.1         | 36.4      | 0.0                            | 11.0         | 15.7      |
| Total                                                                                                                                                     | 31,923                    | 4,667,869 | 100.0      | 133,926        | 22.1                 | 13.8         | 7.8       | 16.8                      | 20.5         | 19.0      | 20.0                    | 20.6         | 21.0      | 41.2                   | 34.1         | 36.4      | 0.0                            | 11.0         | 15.7      |
| Source: 2015 ACS ; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Cincinnati CSA                                                                                                                                               | 13,515                          | 1,495,643 | 100.0      | 45,450         | 6.5               | 6.8          | 6.7       | 19.5                   | 17.5         | 18.2      | 36.8                 | 33.3         | 35.6      | 36.1                | 41.2         | 38.8      | 1.0                         | 1.1          | 0.8       |
| Total                                                                                                                                                        | 13,515                          | 1,495,643 | 100.0      | 45,450         | 6.5               | 6.8          | 6.7       | 19.5                   | 17.5         | 18.2      | 36.8                 | 33.3         | 35.6      | 36.1                | 41.2         | 38.8      | 1.0                         | 1.1          | 0.8       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |                  |              |                |                                   |              |             |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |                  |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$               | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Cincinnati CSA                                                                                                                                               | 13,515                          | 1,495,643        | 100.0        | 45,450         | 83.0                              | 61.7         | 44.1        | 5.3                              | 24.4         | 11.6                                   | 13.9         |
| <b>Total</b>                                                                                                                                                 | <b>13,515</b>                   | <b>1,495,643</b> | <b>100.0</b> | <b>45,450</b>  | <b>83.0</b>                       | <b>61.7</b>  | <b>44.1</b> | <b>5.3</b>                       | <b>24.4</b>  | <b>11.6</b>                            | <b>13.9</b>  |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |                  |              |                |                                   |              |             |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |              |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |              |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                                                                              | #                    | \$           | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate   | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| Cincinnati CSA                                                                                                                                               | 144                  | 4,852        | 100.0        | 315            | 3.2               | 1.4          | 2.9        | 16.3                   | 19.4         | 17.1        | 49.6                 | 69.4         | 53.0        | 30.9                | 9.7          | 27.0        | 0.1                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                                 | <b>144</b>           | <b>4,852</b> | <b>100.0</b> | <b>315</b>     | <b>3.2</b>        | <b>1.4</b>   | <b>2.9</b> | <b>16.3</b>            | <b>19.4</b>  | <b>17.1</b> | <b>49.6</b>          | <b>69.4</b>  | <b>53.0</b> | <b>30.9</b>         | <b>9.7</b>   | <b>27.0</b> | <b>0.1</b>                  | <b>0.0</b>   | <b>0.0</b> |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |              |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              |            |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Cincinnati CSA                                                                                                                                               | 144                  | 4,852 | 100.0      | 315            | 96.6                         | 72.2         | 57.5      | 1.6                         | 4.2          | 1.8                               | 23.6         |
| Total                                                                                                                                                        | 144                  | 4,852 | 100.0      | 315            | 96.6                         | 72.2         | 57.5      | 1.6                         | 4.2          | 1.8                               | 23.6         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |



| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |         |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |         |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$      | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Evansville MMSA                                                                                                                                          | 3,625                     | 388,438 | 100.0      | 16,886         | 5.7                               | 3.3          | 3.5       | 13.6                              | 12.1         | 12.9      | 48.2                              | 46.5         | 44.5      | 32.4                              | 38.1         | 39.0      | 0.1                               | 0.1          | 0.1       |
| Total                                                                                                                                                    | 3,625                     | 388,438 | 100.0      | 16,886         | 5.7                               | 3.3          | 3.5       | 13.6                              | 12.1         | 12.9      | 48.2                              | 46.5         | 44.5      | 32.4                              | 38.1         | 39.0      | 0.1                               | 0.1          | 0.1       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |         |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |         |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |         |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$      | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Evansville MMSA                                                                                                                                          | 3,625                     | 388,438 | 100.0      | 16,886         | 21.3                 | 17.4         | 11.7      | 17.6                      | 24.4         | 20.9      | 20.6                    | 22.9         | 19.8      | 40.4                   | 31.6         | 23.7      | 0.0                            | 3.7          | 23.9      |
| Total                                                                                                                                                    | 3,625                     | 388,438 | 100.0      | 16,886         | 21.3                 | 17.4         | 11.7      | 17.6                      | 24.4         | 20.9      | 20.6                    | 22.9         | 19.8      | 40.4                   | 31.6         | 23.7      | 0.0                            | 3.7          | 23.9      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |         |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |        |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |        |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$     | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Evansville MMSA                                                                                                                                              | 888                             | 85,413 | 100.0      | 5,220          | 8.5               | 8.8          | 8.5       | 20.1                   | 21.7         | 21.4      | 38.3                 | 38.7         | 37.8      | 29.0                | 26.1         | 28.3      | 4.1                         | 4.6          | 4.0       |
| Total                                                                                                                                                        | 888                             | 85,413 | 100.0      | 5,220          | 8.5               | 8.8          | 8.5       | 20.1                   | 21.7         | 21.4      | 38.3                 | 38.7         | 37.8      | 29.0                | 26.1         | 28.3      | 4.1                         | 4.6          | 4.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |        |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |               |              |                |                                   |              |             |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$            | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Evansville MMSA                                                                                                                                              | 888                             | 85,413        | 100.0        | 5,220          | 83.8                              | 69.4         | 32.9        | 4.9                              | 21.6         | 11.2                                   | 9.0          |
| <b>Total</b>                                                                                                                                                 | <b>888</b>                      | <b>85,413</b> | <b>100.0</b> | <b>5,220</b>   | <b>83.8</b>                       | <b>69.4</b>  | <b>32.9</b> | <b>4.9</b>                       | <b>21.6</b>  | <b>11.2</b>                            | <b>9.0</b>   |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |               |              |                |                                   |              |             |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |              |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |              |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |            | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                                                                              | #                    | \$           | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate  | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| Evansville MMSA                                                                                                                                              | 25                   | 2,007        | 100.0        | 220            | 3.5               | 0.0          | 0.0        | 8.9                    | 0.0          | 5.9        | 55.5                 | 84.0         | 78.2        | 31.5                | 16.0         | 15.9        | 0.5                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                                 | <b>25</b>            | <b>2,007</b> | <b>100.0</b> | <b>220</b>     | <b>3.5</b>        | <b>0.0</b>   | <b>0.0</b> | <b>8.9</b>             | <b>0.0</b>   | <b>5.9</b> | <b>55.5</b>          | <b>84.0</b>  | <b>78.2</b> | <b>31.5</b>         | <b>16.0</b>  | <b>15.9</b> | <b>0.5</b>                  | <b>0.0</b>   | <b>0.0</b> |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |              |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              |            |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Evansville MMSA                                                                                                                                              | 25                   | 2,007 | 100.0      | 220            | 98.0                         | 68.0         | 62.7      | 0.9                         | 8.0          | 1.0                               | 24.0         |
| Total                                                                                                                                                        | 25                   | 2,007 | 100.0      | 220            | 98.0                         | 68.0         | 62.7      | 0.9                         | 8.0          | 1.0                               | 24.0         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography |                           |                  |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              | 2017-21    |
|--------------------------------------------------------------------------------------------------|---------------------------|------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| Assessment Area:                                                                                 | Total Home Mortgage Loans |                  |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|                                                                                                  | #                         | \$               | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |
| Louisville MMSA                                                                                  | 8,566                     | 1,252,908        | 100.0        | 63,767         | 4.7                               | 2.8          | 3.1        | 14.7                              | 12.8         | 12.0        | 41.0                              | 36.7         | 39.2        | 39.4                              | 47.6         | 45.6        | 0.1                               | 0.1          | 0.1        |
| <b>Total</b>                                                                                     | <b>8,566</b>              | <b>1,252,908</b> | <b>100.0</b> | <b>63,767</b>  | <b>4.7</b>                        | <b>2.8</b>   | <b>3.1</b> | <b>14.7</b>                       | <b>12.8</b>  | <b>12.0</b> | <b>41.0</b>                       | <b>36.7</b>  | <b>39.2</b> | <b>39.4</b>                       | <b>47.6</b>  | <b>45.6</b> | <b>0.1</b>                        | <b>0.1</b>   | <b>0.1</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower |                           |                  |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              | 2017-21     |
|-------------------------------------------------------------------------------------------------|---------------------------|------------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| Assessment Area:                                                                                | Total Home Mortgage Loans |                  |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|                                                                                                 | #                         | \$               | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Louisville MMSA                                                                                 | 8,566                     | 1,252,908        | 100.0        | 63,767         | 21.1                 | 13.4         | 8.9        | 17.3                      | 21.8         | 20.6        | 19.7                    | 22.1         | 20.1        | 42.0                   | 39.4         | 33.6        | 0.0                            | 3.4          | 16.9        |
| <b>Total</b>                                                                                    | <b>8,566</b>              | <b>1,252,908</b> | <b>100.0</b> | <b>63,767</b>  | <b>21.1</b>          | <b>13.4</b>  | <b>8.9</b> | <b>17.3</b>               | <b>21.8</b>  | <b>20.6</b> | <b>19.7</b>             | <b>22.1</b>  | <b>20.1</b> | <b>42.0</b>            | <b>39.4</b>  | <b>33.6</b> | <b>0.0</b>                     | <b>3.4</b>   | <b>16.9</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography |                                 |                |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                       | Total Loans to Small Businesses |                |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                        | #                               | \$             | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Louisville MMSA                                                                                        | 2,336                           | 236,370        | 100.0        | 23,647         | 8.0               | 6.2          | 7.5        | 15.3                   | 14.2         | 13.9        | 32.3                 | 28.2         | 31.1        | 41.0                | 46.0         | 43.6        | 3.4                         | 5.4          | 4.0        |
| <b>Total</b>                                                                                           | <b>2,336</b>                    | <b>236,370</b> | <b>100.0</b> | <b>23,647</b>  | <b>8.0</b>        | <b>6.2</b>   | <b>7.5</b> | <b>15.3</b>            | <b>14.2</b>  | <b>13.9</b> | <b>32.3</b>          | <b>28.2</b>  | <b>31.1</b> | <b>41.0</b>         | <b>46.0</b>  | <b>43.6</b> | <b>3.4</b>                  | <b>5.4</b>   | <b>4.0</b> |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |         |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Louisville MMSA                                                                                                                                              | 2,336                           | 236,370 | 100.0      | 23,647         | 87.8                              | 66.7         | 35.9      | 4.0                              | 22.3         | 8.2                                    | 11.0         |
| Total                                                                                                                                                        | 2,336                           | 236,370 | 100.0      | 23,647         | 87.8                              | 66.7         | 35.9      | 4.0                              | 22.3         | 8.2                                    | 11.0         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                                   |              |           |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| Louisville MMSA                                                                                                                                              | 11                   | 1,14  | 100.0      | 129            | 4.1               | 0.0          | 0.0       | 10.3                   | 0.0          | 2.3       | 40.1                 | 54.5         | 40.3      | 44.6                | 45.5         | 57.4      | 0.8                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 11                   | 1,114 | 100.0      | 129            | 4.1               | 0.0          | 0.0       | 10.3                   | 0.0          | 2.3       | 40.1                 | 54.5         | 40.3      | 44.6                | 45.5         | 57.4      | 0.8                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Louisville MMSA                                                                                                                                              | 11                   | 1,114 | 100.0      | 129            | 97.5                         | 63.6         | 47.3      | 1.4                         | 27.3         | 1.1                               | 9.1          |
| Total                                                                                                                                                        | 11                   | 1,114 | 100.0      | 129            | 97.5                         | 63.6         | 47.3      | 1.4                         | 27.3         | 1.1                               | 9.1          |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography |                           |                |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              | 2017-21    |
|--------------------------------------------------------------------------------------------------|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| Assessment Area:                                                                                 | Total Home Mortgage Loans |                |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|                                                                                                  | #                         | \$             | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |
| South Bend CSA                                                                                   | 2,507                     | 332,416        | 100.0        | 33,708         | 3.4                               | 1.4          | 2.0        | 12.6                              | 9.0          | 10.2        | 56.1                              | 63.5         | 57.4        | 28.0                              | 26.0         | 30.4        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>                                                                                     | <b>2,507</b>              | <b>332,416</b> | <b>100.0</b> | <b>33,708</b>  | <b>3.4</b>                        | <b>1.4</b>   | <b>2.0</b> | <b>12.6</b>                       | <b>9.0</b>   | <b>10.2</b> | <b>56.1</b>                       | <b>63.5</b>  | <b>57.4</b> | <b>28.0</b>                       | <b>26.0</b>  | <b>30.4</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower |                           |                |              |                |                      |              |             |                           |              |             |                         |              |             |                        |              |             |                                |              | 2017-21     |
|-------------------------------------------------------------------------------------------------|---------------------------|----------------|--------------|----------------|----------------------|--------------|-------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| Assessment Area:                                                                                | Total Home Mortgage Loans |                |              |                | Low-Income Borrowers |              |             | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|                                                                                                 | #                         | \$             | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate   | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| South Bend CSA                                                                                  | 2,507                     | 332,416        | 100.0        | 33,708         | 21.0                 | 13.5         | 10.0        | 17.5                      | 21.0         | 21.0        | 21.1                    | 22.3         | 21.5        | 40.5                   | 37.9         | 34.9        | 0.0                            | 5.3          | 12.6        |
| <b>Total</b>                                                                                    | <b>2,507</b>              | <b>332,416</b> | <b>100.0</b> | <b>33,708</b>  | <b>21.0</b>          | <b>13.5</b>  | <b>10.0</b> | <b>17.5</b>               | <b>21.0</b>  | <b>21.0</b> | <b>21.1</b>             | <b>22.3</b>  | <b>21.5</b> | <b>40.5</b>            | <b>37.9</b>  | <b>34.9</b> | <b>0.0</b>                     | <b>5.3</b>   | <b>12.6</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography |                                 |               |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                       | Total Loans to Small Businesses |               |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                        | #                               | \$            | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| South Bend CSA                                                                                         | 958                             | 89,004        | 100.0        | 11,007         | 7.7               | 6.8          | 6.5        | 15.2                   | 10.6         | 13.1        | 51.7                 | 58.2         | 54.5        | 25.4                | 24.3         | 26.0        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                           | <b>958</b>                      | <b>89,004</b> | <b>100.0</b> | <b>11,007</b>  | <b>7.7</b>        | <b>6.8</b>   | <b>6.5</b> | <b>15.2</b>            | <b>10.6</b>  | <b>13.1</b> | <b>51.7</b>          | <b>58.2</b>  | <b>54.5</b> | <b>25.4</b>         | <b>24.3</b>  | <b>26.0</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |               |              |                |                                   |              |             |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$            | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| South Bend CSA                                                                                                                                               | 958                             | 89,004        | 100.0        | 11,007         | 84.3                              | 68.8         | 33.1        | 5.1                              | 18.0         | 10.6                                   | 13.3         |
| <b>Total</b>                                                                                                                                                 | <b>958</b>                      | <b>89,004</b> | <b>100.0</b> | <b>11,007</b>  | <b>84.3</b>                       | <b>68.8</b>  | <b>33.1</b> | <b>5.1</b>                       | <b>18.0</b>  | <b>10.6</b>                            | <b>13.3</b>  |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |               |              |                |                                   |              |             |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |              |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |              |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |            | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                                                                              | #                    | \$           | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate  | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| South Bend CSA                                                                                                                                               | 51                   | 6,581        | 100.0        | 309            | 1.7               | 0.0          | 0.0        | 6.9                    | 0.0          | 2.9        | 63.1                 | 88.2         | 58.9        | 28.2                | 11.8         | 38.2        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                                 | <b>51</b>            | <b>6,581</b> | <b>100.0</b> | <b>309</b>     | <b>1.7</b>        | <b>0.0</b>   | <b>0.0</b> | <b>6.9</b>             | <b>0.0</b>   | <b>2.9</b> | <b>63.1</b>          | <b>88.2</b>  | <b>58.9</b> | <b>28.2</b>         | <b>11.8</b>  | <b>38.2</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |              |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              |            |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| South Bend CSA                                                                                                                                               | 51                   | 6,581 | 100.0      | 309            | 97.1                         | 76.5         | 53.1      | 2.3                         | 5.9          | 0.6                               | 17.6         |
| Total                                                                                                                                                        | 51                   | 6,581 | 100.0      | 309            | 97.1                         | 76.5         | 53.1      | 2.3                         | 5.9          | 0.6                               | 17.6         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           | 2017-21                           |              |           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Tampa MSA                                                                                                                                                | 5,225                     | 1,265,398 | 21.5       | 177,031        | 2.1                               | 1.8          | 2.0       | 20.2                              | 18.2         | 16.0      | 38.2                              | 31.4         | 35.6      | 39.4                              | 48.5         | 46.4      | 0.1                               | 0.1          | 0.1       |
| Cape Coral CSA                                                                                                                                           | 5,213                     | 1,431,316 | 21.5       | 82,888         | 2.1                               | 0.6          | 1.4       | 17.8                              | 14.0         | 17.8      | 43.2                              | 43.2         | 43.9      | 36.9                              | 42.2         | 36.9      | 0.0                               | 0.0          | 0.0       |
| Jacksonville MSA                                                                                                                                         | 1,373                     | 373,759   | 5.7        | 95,377         | 3.7                               | 1.2          | 1.7       | 19.7                              | 10.4         | 14.1      | 38.6                              | 27.4         | 36.8      | 37.9                              | 61.0         | 47.3      | 0.0                               | 0.0          | 0.0       |
| Miami MSA                                                                                                                                                | 3,515                     | 1,299,394 | 14.7       | 258,889        | 2.6                               | 1.8          | 2.1       | 23.2                              | 18.6         | 19.1      | 32.9                              | 29.1         | 32.4      | 41.2                              | 50.2         | 46.0      | 0.2                               | 0.3          | 0.4       |
| North Port CSA                                                                                                                                           | 2,897                     | 707,867   | 11.9       | 74,796         | 0.8                               | 0.5          | 0.3       | 16.8                              | 8.9          | 12.9      | 54.7                              | 53.8         | 48.9      | 27.6                              | 37.0         | 37.8      | 0.0                               | 0.0          | 0.0       |
| Orlando CSA                                                                                                                                              | 6,073                     | 1,429,103 | 25.0       | 225,948        | 1.0                               | 0.7          | 0.7       | 19.1                              | 16.8         | 15.1      | 46.7                              | 41.0         | 47.9      | 33.2                              | 41.6         | 36.3      | 0.0                               | 0.0          | 0.0       |
| Total                                                                                                                                                    | 24,296                    | 6,506,837 | 100.0      | 914,929        | 2.1                               | 1.1          | 1.5       | 20.5                              | 15.5         | 16.3      | 39.9                              | 38.5         | 39.7      | 37.4                              | 45.0         | 42.3      | 0.1                               | 0.0          | 0.1       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|--|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |  |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |  |
| Tampa MSA                                                                                                                                                | 5,225                     | 1,265,398 | 21.5       | 177,031        | 21.3                 | 10.0         | 4.4       | 17.6                      | 17.2         | 14.6      | 18.8                    | 17.5         | 19.9      | 42.3                   | 47.0         | 43.0      | 0.0                            | 8.3          | 18.2      |  |
| Cape Coral CSA                                                                                                                                           | 5,213                     | 1,431,316 | 21.5       | 82,888         | 20.8                 | 5.2          | 3.6       | 18.2                      | 15.4         | 14.4      | 19.5                    | 19.7         | 19.1      | 41.5                   | 51.8         | 47.4      | 0.0                            | 7.9          | 15.4      |  |
| Jacksonville MSA                                                                                                                                         | 1,373                     | 373,759   | 5.7        | 95,377         | 21.9                 | 6.5          | 4.5       | 17.1                      | 13.4         | 13.9      | 20.0                    | 16.2         | 19.4      | 41.0                   | 48.8         | 39.5      | 0.0                            | 15.1         | 22.7      |  |
| Miami MSA                                                                                                                                                | 3,515                     | 1,299,394 | 14.5       | 258,889        | 23.1                 | 2.6          | 2.4       | 17.0                      | 11.0         | 9.5       | 17.7                    | 11.9         | 18.0      | 42.2                   | 47.9         | 52.3      | 0.0                            | 26.6         | 17.8      |  |
| North Port CSA                                                                                                                                           | 2,897                     | 707,867   | 11.9       | 74,796         | 19.0                 | 6.8          | 4.8       | 19.4                      | 16.0         | 14.9      | 21.2                    | 21.4         | 20.3      | 40.5                   | 50.2         | 45.4      | 0.0                            | 5.7          | 14.6      |  |
| Orlando CSA                                                                                                                                              | 6,073                     | 1,429,103 | 25.0       | 225,948        | 21.1                 | 7.7          | 3.8       | 18.3                      | 16.5         | 13.9      | 19.8                    | 19.7         | 20.8      | 40.8                   | 44.8         | 41.1      | 0.0                            | 11.4         | 20.4      |  |
| Total                                                                                                                                                    | 24,296                    | 6,506,837 | 100.0      | 914,929        | 21.8                 | 6.7          | 3.6       | 17.7                      | 15.4         | 12.9      | 18.9                    | 18.1         | 19.5      | 41.6                   | 48.1         | 45.4      | 0.0                            | 11.7         | 18.6      |  |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |  |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Tampa MSA                                                                                                                                                    | 3,733                           | 258,573   | 23.6       | 94,432         | 4.3               | 5.1          | 4.9       | 19.7                   | 17.9         | 19.5      | 33.1                 | 33.5         | 33.5      | 42.6                | 43.2         | 41.9      | 0.3                         | 0.3          | 0.3       |
| Cape Coral CSA                                                                                                                                               | 3,449                           | 248,748   | 21.8       | 39,652         | 2.9               | 2.1          | 2.6       | 19.6                   | 15.6         | 18.1      | 39.8                 | 40.8         | 39.9      | 37.7                | 41.5         | 39.4      | 0.1                         | 0.0          | 0.0       |
| Jacksonville MSA                                                                                                                                             | 848                             | 87,579    | 5.4        | 37,931         | 4.6               | 4.4          | 4.3       | 21.9                   | 20.6         | 20.7      | 33.0                 | 37.0         | 31.3      | 40.5                | 38.0         | 43.6      | 0.0                         | 0.0          | 0.0       |
| Miami MSA                                                                                                                                                    | 1,173                           | 186,866   | 7.4        | 312,668        | 4.1               | 4.8          | 4.6       | 22.2                   | 27.5         | 22.3      | 28.3                 | 27.9         | 27.2      | 44.1                | 37.9         | 44.6      | 1.2                         | 2.0          | 1.3       |
| North Port CSA                                                                                                                                               | 1,503                           | 124,337   | 9.5        | 33,742         | 1.2               | 0.9          | 1.0       | 19.0                   | 13.8         | 18.0      | 47.1                 | 45.9         | 46.2      | 32.7                | 39.3         | 34.8      | 0.0                         | 0.0          | 0.0       |
| Orlando CSA                                                                                                                                                  | 5,088                           | 358,556   | 32.2       | 108,873        | 2.1               | 2.2          | 1.9       | 24.6                   | 23.6         | 24.0      | 39.7                 | 41.9         | 38.6      | 33.6                | 32.4         | 35.4      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 15,794                          | 1,264,659 | 100.0      | 627,298        | 3.6               | 3.0          | 3.8       | 22.0                   | 19.7         | 21.6      | 33.1                 | 38.7         | 32.2      | 40.7                | 38.3         | 41.7      | 0.6                         | 0.2          | 0.7       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |           |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Tampa MSA                                                                                                                                                    | 3,733                           | 258,573   | 23.6       | 94,432         | 92.9                              | 73.3         | 41.3      | 2.2                              | 15.2         | 4.9                                    | 11.4         |
| Cape Coral CSA                                                                                                                                               | 3,449                           | 248,748   | 21.8       | 39,652         | 93.3                              | 73.8         | 40.1      | 2.0                              | 16.1         | 4.7                                    | 10.2         |
| Jacksonville MSA                                                                                                                                             | 848                             | 87,579    | 5.4        | 37,931         | 92.2                              | 65.6         | 38.5      | 2.2                              | 22.8         | 5.6                                    | 11.7         |
| Miami MSA                                                                                                                                                    | 1,173                           | 186,866   | 7.4        | 312,668        | 94.4                              | 62.2         | 39.7      | 1.9                              | 26.9         | 3.7                                    | 10.8         |
| North Port CSA                                                                                                                                               | 1,503                           | 124,337   | 9.5        | 33,742         | 93.1                              | 72.8         | 43.6      | 2.1                              | 17.7         | 4.8                                    | 9.5          |
| Orlando CSA                                                                                                                                                  | 5,088                           | 358,556   | 32.2       | 108,873        | 93.3                              | 71.1         | 41.7      | 1.9                              | 16.1         | 4.9                                    | 12.8         |
| Total                                                                                                                                                        | 15,794                          | 1,264,659 | 100.0      | 627,298        | 93.7                              | 71.4         | 40.5      | 2.0                              | 17.2         | 4.4                                    | 11.4         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                                   |              |           |                                  |              |                                        |              |



| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Tampa MSA                                                                                                                                                    | 13                   | 595   | 43.3       | 187            | 3.4               | 7.7          | 1.6       | 22.9                   | 7.7          | 16.6      | 37.6                 | 30.8         | 41.2      | 36.0                | 53.8         | 40.6      | 0.1                         | 0.0          | 0.0       |
| Cape Coral CSA                                                                                                                                               | 5                    | 111   | 16.7       | 114            | 4.0               | 20.0         | 2.6       | 24.8                   | 0.0          | 17.5      | 45.2                 | 40.0         | 42.1      | 25.9                | 40.0         | 37.7      | 0.0                         | 0.0          | 0.0       |
| Jacksonville MSA                                                                                                                                             | 1                    | 13    | 3.3        | 89             | 3.8               | 0.0          | 0.0       | 21.9                   | 0.0          | 13.5      | 40.7                 | 0.0          | 49.4      | 33.6                | 100.0        | 37.1      | 0.0                         | 0.0          | 0.0       |
| Miami MSA                                                                                                                                                    | 0                    | 0     | 0.0        | 605            | 5.1               | 0.0          | 2.1       | 25.2                   | 0.0          | 12.2      | 29.6                 | 0.0          | 27.9      | 39.7                | 0.0          | 57.4      | 0.4                         | 0.0          | 0.3       |
| North Port CSA                                                                                                                                               | 6                    | 508   | 20.0       | 101            | 1.9               | 0.0          | 0.0       | 21.1                   | 16.7         | 19.8      | 47.5                 | 33.3         | 23.8      | 29.4                | 50.0         | 56.4      | 0.0                         | 0.0          | 0.0       |
| Orlando CSA                                                                                                                                                  | 5                    | 153   | 16.7       | 316            | 1.5               | 0.0          | 1.3       | 22.4                   | 18.2         | 17.7      | 47.6                 | 60.0         | 47.8      | 28.4                | 20.0         | 32.6      | 0.1                         | 0.0          | 0.6       |
| Total                                                                                                                                                        | 30                   | 1,380 | 100.0      | 1,412          | 3.4               | 6.7          | 1.6       | 23.5                   | 10.0         | 15.1      | 39.2                 | 36.7         | 36.3      | 33.7                | 46.7         | 46.7      | 0.2                         | 0.0          | 0.3       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Tampa MSA                                                                                                                                                    | 13                   | 595   | 43.3       | 187            | 97.5                         | 84.6         | 62.6      | 1.5                         | 0.0          | 1.1                               | 15.4         |
| Cape Coral CSA                                                                                                                                               | 5                    | 111   | 16.7       | 114            | 97.2                         | 100.0        | 40.4      | 1.7                         | 0.0          | 1.1                               | 0.0          |
| Jacksonville MSA                                                                                                                                             | 1                    | 13    | 3.3        | 89             | 97.9                         | 100.0        | 49.4      | 1.2                         | 0.0          | 1.0                               | 0.0          |
| Miami MSA                                                                                                                                                    | 0                    | 0     | 0.0        | 605            | 97.5                         | 0            | 55.7      | 1.5                         | 0.0          | 0.9                               | 0.0          |
| North Port CSA                                                                                                                                               | 6                    | 508   | 20.0       | 101            | 97.4                         | 66.7         | 56.4      | 1.4                         | 33.3         | 1.1                               | 0.0          |
| Orlando CSA                                                                                                                                                  | 5                    | 153   | 16.7       | 316            | 97.3                         | 80.0         | 54.7      | 1.6                         | 0.0          | 1.1                               | 20.0         |
| Total                                                                                                                                                        | 30                   | 1,380 | 100.0      | 1,412          | 97.5                         | 83.3         | 54.8      | 1.5                         | 6.7          | 1.0                               | 10.0         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Atlanta MSA                                                                                                                                              | 4,559                     | 1,381,376 | 95.0       | 244,231        | 4.2                               | 4.1          | 4.1       | 17.3                              | 13.8         | 13.8      | 28.8                              | 22.9         | 27.9      | 49.7                              | 59.1         | 52.7      | 0.0                               | 0.1          | 0.1       |
| Augusta MSA                                                                                                                                              | 281                       | 38,292    | 5.8        | 19,808         | 7.1                               | 4.6          | 2.4       | 15.1                              | 9.6          | 7.3       | 35.8                              | 39.1         | 34.4      | 42.0                              | 46.6         | 55.9      | 0.0                               | 0.0          | 0.0       |
| Total                                                                                                                                                    | 4,840                     | 1,419,668 | 100.0      | 264,039        | 4.4                               | 4.2          | 4.0       | 17.1                              | 13.6         | 14.6      | 29.4                              | 23.8         | 28.4      | 49.0                              | 58.4         | 53.0      | 0.0                               | 0.1          | 0.1       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Atlanta MSA                                                                                                                                              | 4,559                     | 1,381,376 | 94.2       | 244,231        | 22.2                 | 6.6          | 5.2       | 15.7                      | 13.2         | 14.4      | 16.8                    | 13.3         | 18.4      | 45.4                   | 44.9         | 43.6      | 0.0                            | 22.0         | 18.4      |
| Augusta MSA                                                                                                                                              | 281                       | 38,292    | 5.8        | 19,808         | 23.4                 | 10.3         | 3.6       | 14.7                      | 23.1         | 12.3      | 18.1                    | 22.4         | 18.6      | 43.8                   | 37.7         | 34.8      | 0.0                            | 7.8          | 30.7      |
| Total                                                                                                                                                    | 4,840                     | 1,419,668 | 100.0      | 264,039        | 22.3                 | 6.9          | 5.1       | 15.6                      | 13.7         | 14.2      | 16.9                    | 13.8         | 18.5      | 45.2                   | 44.5         | 42.9      | 0.0                            | 21.1         | 19.3      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Atlanta MSA                                                                                                                                                  | 1,879                           | 236,363 | 95.1       | 142,807        | 7.0               | 5.3          | 5.6       | 21.3                   | 23.4         | 18.5      | 25.6                 | 22.0         | 24.6      | 45.6                | 49.1         | 51.0      | 0.5                         | 0.2          | 0.4       |
| Augusta MSA                                                                                                                                                  | 96                              | 8,462   | 4.9        | 7,362          | 9.9               | 12.5         | 9.1       | 16.5                   | 30.2         | 12.8      | 29.5                 | 26.0         | 28.3      | 44.1                | 31.3         | 49.8      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 1,975                           | 244,825 | 100.0      | 150,169        | 7.1               | 5.6          | 5.7       | 21.1                   | 23.7         | 18.2      | 25.8                 | 22.2         | 24.8      | 45.5                | 48.3         | 50.9      | 0.5                         | 0.2          | 0.4       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |         |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Atlanta MSA                                                                                                                                                  | 1,879                           | 236,363 | 95.1       | 142,807        | 93.0                              | 63.9         | 42.6      | 2.3                              | 24.1         | 4.8                                    | 12.0         |
| Augusta MSA                                                                                                                                                  | 96                              | 8,462   | 4.9        | 7,362          | 89.5                              | 71.9         | 33.7      | 2.6                              | 17.7         | 7.8                                    | 10.4         |
| Total                                                                                                                                                        | 1,975                           | 244,825 | 100.0      | 150,169        | 92.8                              | 64.3         | 42.1      | 2.3                              | 23.8         | 4.9                                    | 11.9         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                                   |              |           |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |    |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |    |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$ | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| Atlanta MSA                                                                                                                                                  | 1                    | 9  | 100.0      | 170            | 5.8               | 0.0          | 2.4       | 20.8                   | 0.0          | 14.1      | 31.1                 | 0.0          | 40.0      | 42.0                | 100.0        | 43.5      | 0.1                         | 0.0          | 0.0       |
| Augusta MSA                                                                                                                                                  | 0                    | 0  | 0.0        | 22             | 8.0               | 0.0          | 4.5       | 13.2                   | 0.0          | 0.0       | 34.8                 | 0.0          | 50.0      | 44.0                | 0.0          | 45.5      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 1                    | 9  | 100.0      | 192            | 6.0               | 0.0          | 2.6       | 20.3                   | 0.0          | 12.5      | 31.4                 | 0.0          | 41.1      | 42.2                | 100.0        | 43.8      | 0.1                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |    |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |    |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |    |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$ | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Atlanta MSA                                                                                                                                                  | 1                    | 9  | 100.0      | 170            | 96.6                         | 100.0        | 61.2      | 1.7                         | 0.0          | 1.6                               | 0.0          |
| Augusta MSA                                                                                                                                                  | 0                    | 0  | 0.0        | 22             | 98.5                         | 0.0          | 27.3      | 1.1                         | 0.0          | 0.5                               | 0.0          |
| Total                                                                                                                                                        | 1                    | 9  | 100.0      | 192            | 96.8                         | 100.0        | 57.3      | 1.7                         | 0.0          | 1.5                               | 0.0          |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |    |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |        |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|--------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |        |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$     | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| IL Non-MSA                                                                                                                                               | 422                       | 38,816 | 47.4       | 3,563          | 0.5                               | 0.8          | 0.1       | 12.8                              | 4.5          | 10.2      | 60.7                              | 49.5         | 61.1      | 26.1                              | 45.7         | 28.6      | 0.0                               | 0.0          | 0.0       |
| Carbondale MSA                                                                                                                                           | 138                       | 12,553 | 15.5       | 2,293          | 0.0                               | 0.0          | 0.0       | 15.4                              | 14.5         | 12.4      | 53.8                              | 50.0         | 51.1      | 30.8                              | 35.5         | 36.5      | 0.0                               | 0.0          | 0.0       |
| Rockford CSA                                                                                                                                             | 331                       | 29,449 | 37.1       | 13,257         | 5.7                               | 2.7          | 2.9       | 16.7                              | 11.8         | 13.0      | 36.2                              | 52.6         | 35.3      | 41.3                              | 32.9         | 48.7      | 0.0                               | 0.0          | 0.1       |
| Total                                                                                                                                                    | 891                       | 80,818 | 100.0      | 19,113         | 3.6                               | 1.1          | 2.1       | 15.5                              | 8.8          | 12.4      | 45.0                              | 50.7         | 42.0      | 35.9                              | 39.4         | 43.5      | 0.0                               | 0.0          | 0.0       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |        |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |        |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|--------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |        |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$     | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| IL Non-MSA                                                                                                                                               | 422                       | 38,816 | 47.4       | 3,563          | 18.4                 | 13.7         | 8.2       | 18.4                      | 24.6         | 19.1      | 22.5                    | 27.0         | 20.7      | 40.7                   | 31.3         | 31.0      | 0.0                            | 3.3          | 21.1      |
| Carbondale MSA                                                                                                                                           | 138                       | 12,553 | 15.5       | 2,293          | 18.9                 | 10.1         | 6.9       | 20.1                      | 29.0         | 15.4      | 19.0                    | 26.8         | 20.0      | 42.1                   | 26.8         | 37.7      | 0.0                            | 7.2          | 19.9      |
| Rockford CSA                                                                                                                                             | 331                       | 29,449 | 37.1       | 13,257         | 22.8                 | 14.5         | 11.0      | 17.2                      | 21.1         | 20.3      | 20.4                    | 24.8         | 22.0      | 39.6                   | 34.1         | 27.0      | 0.0                            | 5.4          | 19.6      |
| Total                                                                                                                                                    | 891                       | 80,818 | 100.0      | 19,113         | 21.2                 | 13.5         | 10.0      | 17.9                      | 24.0         | 19.5      | 20.7                    | 26.2         | 21.6      | 40.2                   | 31.7         | 29.0      | 0.0                            | 4.7          | 19.9      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |        |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |        |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |        |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$     | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| IL Non-MSA                                                                                                                                                   | 138                             | 16,094 | 41.4       | 1,379          | 4.4               | 5.8          | 3.5       | 9.6                    | 7.2          | 9.1       | 56.1                 | 39.9         | 58.8      | 29.8                | 47.1         | 28.6      | 0.0                         | 0.0          | 0.0       |
| Carbondale MSA                                                                                                                                               | 16                              | 3,094  | 4.8        | 1,056          | 0.0               | 0.0          | 0.0       | 15.5                   | 12.5         | 11.6      | 59.6                 | 81.3         | 56.2      | 24.9                | 6.3          | 32.2      | 0.0                         | 0.0          | 0.0       |
| Rockford CSA                                                                                                                                                 | 179                             | 17,450 | 53.8       | 5,255          | 11.3              | 16.8         | 9.7       | 16.4                   | 19.6         | 17.1      | 30.6                 | 34.6         | 28.7      | 39.5                | 29.1         | 41.5      | 2.2                         | 0.0          | 2.9       |
| Total                                                                                                                                                        | 333                             | 36,638 | 100.0      | 7,690          | 8.1               | 11.4         | 7.2       | 14.5                   | 14.1         | 15.0      | 40.9                 | 39.0         | 37.9      | 35.1                | 35.4         | 37.9      | 1.4                         | 0.0          | 2.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |        |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |        |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |        |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$     | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| IL Non-MSA                                                                                                                                                   | 138                             | 16,094 | 41.4       | 1,379          | 78.1                              | 54.3         | 39.7      | 5.9                              | 29.7         | 16.0                                   | 15.9         |
| Carbondale MSA                                                                                                                                               | 16                              | 3,094  | 4.8        | 1,056          | 81.3                              | 43.8         | 43.3      | 5.0                              | 0.0          | 13.7                                   | 56.3         |
| Rockford CSA                                                                                                                                                 | 179                             | 17,450 | 53.8       | 5,255          | 82.3                              | 65.4         | 35.2      | 5.9                              | 21.2         | 11.7                                   | 13.4         |
| Total                                                                                                                                                        | 333                             | 36,638 | 100.0      | 7,690          | 81.1                              | 59.8         | 37.1      | 5.8                              | 23.7         | 13.1                                   | 16.5         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |        |            |                |                                   |              |           |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| IL Non-MSA                                                                                                                                                   | 27                   | 1,570 | 93.1       | 236            | 0.4               | 0.0          | 0.0       | 3.5                    | 0.0          | 4.7       | 63.7                 | 22.2         | 77.1      | 32.5                | 77.8         | 18.2      | 0.0                         | 0.0          | 0.0       |
| Carbondale MSA                                                                                                                                               | 2                    | 24    | 6.9        | 51             | 0.0               | 0.0          | 0.0       | 8.4                    | 0.0          | 0.0       | 48.8                 | 100.0        | 68.6      | 42.8                | 0.0          | 31.4      | 0.0                         | 0.0          | 0.0       |
| Rockford CSA                                                                                                                                                 | 0                    | 0     | 0.0        | 157            | 4.1               | 0.0          | 0.6       | 10.4                   | 0.0          | 1.3       | 45.8                 | 0.0          | 55.4      | 39.1                | 0.0          | 42.7      | 0.6                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 29                   | 1,594 | 100.0      | 444            | 2.3               | 0.0          | 0.2       | 7.5                    | 0.0          | 2.9       | 53.0                 | 27.6         | 68.5      | 36.8                | 72.4         | 28.4      | 0.3                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| IL Non-MSA                                                                                                                                                   | 27                   | 1,570 | 93.1       | 236            | 98.1                         | 59.3         | 61.0      | 1.1                         | 0.0          | 0.8                               | 40.7         |
| Carbondale MSA                                                                                                                                               | 2                    | 24    | 6.9        | 51             | 94.6                         | 50.0         | 58.8      | 1.2                         | 0.0          | 4.2                               | 50.0         |
| Rockford CSA                                                                                                                                                 | 0                    | 0     | 0.0        | 157            | 96.3                         | 0.0          | 50.3      | 2.5                         | 0.0          | 1.2                               | 0.0          |
| Total                                                                                                                                                        | 29                   | 1,594 | 100.0      | 444            | 96.8                         | 58.6         | 57.0      | 1.8                         | 0.0          | 1.3                               | 41.4         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Indianapolis CSA                                                                                                                                         | 11,997                    | 1,962,265 | 59.8       | 130,471        | 6.2                               | 5.4          | 4.7       | 16.5                              | 15.5         | 13.9      | 35.0                              | 33.1         | 32.0      | 42.3                              | 46.0         | 49.3      | 0.1                               | 0.1          | 0.0       |
| Bloomington MSA                                                                                                                                          | 575                       | 91,097    | 2.9        | 6,604          | 3.1                               | 1.0          | 2.4       | 7.6                               | 9.2          | 8.8       | 44.8                              | 47.3         | 46.2      | 44.4                              | 42.3         | 42.7      | 0.0                               | 0.2          | 0.0       |
| Fort Wayne CSA                                                                                                                                           | 3,277                     | 501,850   | 16.3       | 25,302         | 5.6                               | 1.8          | 2.0       | 12.5                              | 10.0         | 11.5      | 51.2                              | 43.0         | 46.4      | 30.6                              | 45.2         | 40.0      | 0.1                               | 0.2          | 0.1       |
| Lafayette MSA                                                                                                                                            | 355                       | 47,992    | 1.8        | 8,969          | 1.1                               | 0.3          | 1.0       | 16.2                              | 8.7          | 14.2      | 35.3                              | 38.6         | 33.6      | 47.3                              | 52.4         | 51.0      | 0.1                               | 0.0          | 0.2       |
| Terre Haute MSA                                                                                                                                          | 1,499                     | 122,883   | 7.5        | 6,248          | 2.4                               | 1.5          | 1.6       | 13.8                              | 11.7         | 12.8      | 52.3                              | 56.8         | 51.0      | 31.5                              | 30.0         | 34.7      | 0.0                               | 0.0          | 0.0       |
| IN Non-MSA                                                                                                                                               | 2,350                     | 236,129   | 11.7       | 8,125          | 0.0                               | 0.0          | 0.0       | 7.9                               | 6.4          | 7.5       | 63.3                              | 57.4         | 61.6      | 28.8                              | 36.2         | 30.9      | 0.0                               | 0.0          | 0.0       |
| Total                                                                                                                                                    | 20,053                    | 2,962,216 | 100.0      | 185,719        | 4.9                               | 3.7          | 3.8       | 14.6                              | 12.9         | 13.1      | 41.5                              | 39.8         | 36.5      | 38.9                              | 43.5         | 46.6      | 0.1                               | 0.1          | 0.0       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Indianapolis CSA                                                                                                                                         | 11,997                    | 1,962,265 | 59.8       | 130,471        | 21.8                 | 15.4         | 8.2       | 17.0                      | 21.3         | 18.9      | 19.5                    | 19.9         | 20.7      | 41.8                   | 34.2         | 34.4      | 0.0                            | 9.2          | 17.9      |
| Bloomington MSA                                                                                                                                          | 575                       | 91,097    | 2.9        | 6,604          | 22.2                 | 9.4          | 5.9       | 15.8                      | 21.7         | 16.0      | 19.5                    | 22.6         | 21.3      | 42.5                   | 39.1         | 41.1      | 0.0                            | 7.1          | 15.7      |
| Fort Wayne CSA                                                                                                                                           | 3,277                     | 501,850   | 16.3       | 25,302         | 19.9                 | 10.1         | 8.7       | 18.1                      | 22.6         | 21.4      | 22.2                    | 23.5         | 20.9      | 39.8                   | 41.0         | 33.3      | 0.0                            | 2.8          | 15.7      |
| Lafayette MSA                                                                                                                                            | 355                       | 47,992    | 1.8        | 8,969          | 20.5                 | 12.1         | 8.3       | 15.7                      | 18.6         | 19.3      | 23.0                    | 23.7         | 22.0      | 40.8                   | 41.1         | 34.7      | 0.0                            | 4.5          | 15.6      |
| Terre Haute MSA                                                                                                                                          | 1,499                     | 122,883   | 7.5        | 6,248          | 21.2                 | 12.1         | 6.9       | 18.2                      | 24.5         | 18.9      | 20.5                    | 26.6         | 21.5      | 40.0                   | 34.0         | 35.2      | 0.0                            | 2.9          | 17.5      |
| IN Non-MSA                                                                                                                                               | 2,350                     | 236,129   | 11.7       | 8,125          | 17.2                 | 10.7         | 8.4       | 17.9                      | 25.0         | 20.8      | 22.5                    | 26.8         | 22.3      | 42.5                   | 34.9         | 29.7      | 0.0                            | 2.7          | 18.8      |
| Total                                                                                                                                                    | 20,053                    | 2,962,216 | 100.0      | 185,719        | 21.1                 | 13.5         | 8.1       | 17.2                      | 22.1         | 19.2      | 20.4                    | 21.9         | 20.9      | 41.4                   | 35.7         | 34.3      | 0.0                            | 6.8          | 17.5      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Indianapolis CSA                                                                                                                                             | 3,638                           | 399,409 | 72.7       | 40,489         | 10.9              | 6.4          | 7.7       | 20.8                   | 16.9         | 17.2      | 29.7                 | 32.0         | 30.5      | 38.5                | 44.5         | 44.4      | 0.1                         | 0.2          | 0.2       |
| Bloomington MSA                                                                                                                                              | 187                             | 17,076  | 3.7        | 2,443          | 6.0               | 8.0          | 5.9       | 20.5                   | 23.0         | 22.0      | 34.0                 | 33.7         | 35.9      | 38.0                | 35.3         | 36.1      | 1.5                         | 0.0          | 0.2       |
| Fort Wayne CSA                                                                                                                                               | 448                             | 36,252  | 8.9        | 8,000          | 7.3               | 7.4          | 6.5       | 16.7                   | 16.5         | 16.5      | 42.4                 | 45.5         | 43.0      | 29.8                | 27.0         | 29.3      | 3.8                         | 3.6          | 4.8       |
| Lafayette MSA                                                                                                                                                | 99                              | 7,407   | 2.0        | 2,584          | 4.2               | 3.0          | 3.6       | 28.3                   | 32.3         | 33.6      | 27.5                 | 19.2         | 26.4      | 36.1                | 44.4         | 33.9      | 3.9                         | 1.0          | 2.5       |
| Terre Haute MSA                                                                                                                                              | 218                             | 12,152  | 4.4        | 2,763          | 5.6               | 3.7          | 8.5       | 19.1                   | 20.2         | 17.4      | 45.4                 | 48.2         | 46.1      | 30.0                | 28.0         | 28.0      | 0.0                         | 0.0          | 0.0       |
| IN Non-MSA                                                                                                                                                   | 417                             | 36,336  | 8.3        | 3,279          | 0.0               | 0.0          | 0.0       | 10.2                   | 4.3          | 8.2       | 60.5                 | 63.8         | 58.4      | 29.3                | 31.9         | 33.4      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 5,007                           | 508,632 | 100.0      | 59,558         | 9.2               | 5.9          | 6.9       | 20.0                   | 16.5         | 17.5      | 33.6                 | 36.3         | 34.5      | 36.5                | 40.8         | 40.2      | 0.8                         | 0.5          | 0.9       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |         |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Indianapolis CSA                                                                                                                                             | 3,638                           | 399,409 | 72.7       | 40,489         | 89.1                              | 64.2         | 36.4      | 3.5                              | 24.2         | 7.4                                    | 11.6         |
| Bloomington MSA                                                                                                                                              | 187                             | 17,076  | 3.7        | 2,443          | 87.1                              | 70.1         | 25.5      | 3.6                              | 21.4         | 9.2                                    | 8.6          |
| Fort Wayne CSA                                                                                                                                               | 448                             | 36,252  | 8.9        | 8,000          | 85.7                              | 71.4         | 35.8      | 4.5                              | 19.0         | 9.8                                    | 9.6          |
| Lafayette MSA                                                                                                                                                | 99                              | 7,407   | 2.0        | 2,584          | 86.1                              | 75.8         | 37.7      | 3.5                              | 18.2         | 10.4                                   | 6.1          |
| Terre Haute MSA                                                                                                                                              | 218                             | 12,152  | 4.4        | 2,763          | 81.9                              | 78.9         | 34.5      | 4.5                              | 9.6          | 13.6                                   | 11.5         |
| IN Non-MSA                                                                                                                                                   | 417                             | 36,336  | 8.3        | 3,279          | 82.8                              | 68.6         | 31.4      | 4.6                              | 18.7         | 12.6                                   | 12.7         |
| Total                                                                                                                                                        | 5,007                           | 508,632 | 100.0      | 59,558         | 87.8                              | 66.3         | 35.6      | 3.7                              | 22.4         | 8.4                                    | 11.3         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                                   |              |           |                                  |              |                                        |              |



| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| Indianapolis CSA                                                                                                                                             | 36                   | 1,390 | 40.0       | 541            | 6.1               | 0.0          | 1.1       | 14.7                   | 2.8          | 6.1       | 40.2                 | 72.2         | 57.9      | 38.9                | 25.0         | 34.9      | 0.1                         | 0.0          | 0.0       |
| Bloomington MSA                                                                                                                                              | 2                    | 40    | 2.2        | 24             | 2.2               | 0.0          | 8.3       | 5.5                    | 0.0          | 12.5      | 50.5                 | 0.0          | 50.0      | 41.5                | 100.0        | 29.2      | 0.3                         | 0.0          | 0.0       |
| Fort Wayne CSA                                                                                                                                               | 3                    | 48    | 3.3        | 377            | 2.7               | 0.0          | 0.5       | 7.5                    | 0.0          | 0.5       | 63.9                 | 66.7         | 82.5      | 25.2                | 33.3         | 16.4      | 0.8                         | 0.0          | 0.0       |
| Lafayette MSA                                                                                                                                                | 0                    | 0     | 0.0        | 95             | 1.8               | 0.0          | 0.0       | 13.3                   | 0.0          | 3.2       | 35.9                 | 0.0          | 54.7      | 49.0                | 0.0          | 42.1      | 0.0                         | 0.0          | 0.0       |
| Terre Haute MSA                                                                                                                                              | 18                   | 458   | 20.0       | 419            | 1.3               | 0.0          | 0.0       | 8.3                    | 0.0          | 3.6       | 56.7                 | 72.2         | 53.2      | 33.7                | 27.8         | 43.2      | 0.0                         | 0.0          | 0.0       |
| IN Non-MSA                                                                                                                                                   | 31                   | 1,445 | 34.4       | 580            | 0.0               | 0.0          | 0.0       | 2.4                    | 0.0          | 1.0       | 56.7                 | 74.2         | 56.6      | 40.9                | 25.8         | 42.4      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 90                   | 3,381 | 100.0      | 2,036          | 4.0               | 0.0          | 0.5       | 10.9                   | 1.1          | 3.0       | 47.4                 | 71.1         | 60.9      | 37.5                | 27.8         | 35.6      | 0.2                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Indianapolis CSA                                                                                                                                             | 36                   | 1,390 | 40.0       | 541            | 97.0                         | 75.0         | 58.4      | 1.6                         | 2.8          | 1.3                               | 22.2         |
| Bloomington MSA                                                                                                                                              | 2                    | 40    | 2.2        | 24             | 97.0                         | 100.0        | 54.2      | 2.5                         | 0.0          | 0.5                               | 0.0          |
| Fort Wayne CSA                                                                                                                                               | 3                    | 48    | 3.3        | 377            | 97.5                         | 100.0        | 65.0      | 1.5                         | 0.0          | 1.0                               | 0.0          |
| Lafayette MSA                                                                                                                                                | 0                    | 0     | 0.0        | 95             | 96.9                         | 0.0          | 45.3      | 1.6                         | 0.0          | 1.5                               | 0.0          |
| Terre Haute MSA                                                                                                                                              | 18                   | 458   | 20.0       | 419            | 98.0                         | 77.8         | 68.0      | 0.8                         | 11.1         | 1.2                               | 11.1         |
| IN Non-MSA                                                                                                                                                   | 31                   | 1,445 | 34.4       | 580            | 97.9                         | 54.8         | 62.1      | 1.2                         | 0.0          | 1.0                               | 45.2         |
| Total                                                                                                                                                        | 90                   | 3,381 | 100.0      | 2,036          | 97.3                         | 70.0         | 62.0      | 1.5                         | 3.3          | 1.2                               | 26.7         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** 2017-21

| Assessment Area: | Total Home Mortgage Loans |                |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|------------------|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
|                  | #                         | \$             | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |
| Lexington CSA    | 4,056                     | 692,721        | 74.1         | 33,178         | 3.3                               | 2.9          | 2.4        | 15.6                              | 14.7         | 14.9        | 37.5                              | 34.5         | 35.9        | 43.6                              | 47.9         | 46.8        | 0.0                               | 0.0          | 0.0        |
| Owensboro MSA    | 411                       | 41,669         | 7.5          | 4,902          | 1.8                               | 2.9          | 1.0        | 18.1                              | 17.5         | 16.3        | 50.9                              | 54.0         | 51.4        | 29.2                              | 25.5         | 31.2        | 0.0                               | 0.0          | 0.0        |
| KY Non-MSA       | 1,005                     | 97,874         | 18.4         | 3,944          | 0.0                               | 0.0          | 0.0        | 2.0                               | 2.4          | 1.8         | 55.3                              | 51.7         | 47.8        | 42.6                              | 45.9         | 50.4        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>5,472</b>              | <b>832,264</b> | <b>100.0</b> | <b>42,024</b>  | <b>2.5</b>                        | <b>2.4</b>   | <b>2.1</b> | <b>13.7</b>                       | <b>12.6</b>  | <b>13.8</b> | <b>42.4</b>                       | <b>39.2</b>  | <b>38.8</b> | <b>41.4</b>                       | <b>45.8</b>  | <b>45.3</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** 2017-21

| Assessment Area: | Total Home Mortgage Loans |                |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|------------------|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
|                  | #                         | \$             | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Lexington CSA    | 4,056                     | 692,721        | 74.1         | 33,178         | 22.0                 | 8.6          | 5.7        | 15.0                      | 19.8         | 16.5        | 18.7                    | 21.3         | 20.3        | 44.3                   | 46.9         | 40.0        | 0.0                            | 3.4          | 17.6        |
| Owensboro MSA    | 411                       | 41,669         | 7.6          | 4,902          | 21.8                 | 14.6         | 7.4        | 17.7                      | 28.0         | 19.0        | 19.7                    | 24.3         | 22.6        | 40.8                   | 31.1         | 34.8        | 0.0                            | 2.2          | 16.2        |
| KY Non-MSA       | 1,005                     | 97,874         | 18.4         | 3,944          | 19.0                 | 4.6          | 3.0        | 13.8                      | 16.2         | 12.7        | 18.2                    | 25.2         | 21.8        | 48.9                   | 51.5         | 43.2        | 0.0                            | 2.5          | 19.3        |
| <b>Total</b>     | <b>5,472</b>              | <b>832,264</b> | <b>100.0</b> | <b>42,024</b>  | <b>21.5</b>          | <b>8.3</b>   | <b>5.6</b> | <b>15.2</b>               | <b>19.8</b>  | <b>16.4</b> | <b>18.7</b>             | <b>22.2</b>  | <b>20.7</b> | <b>44.6</b>            | <b>46.6</b>  | <b>39.7</b> | <b>0.0</b>                     | <b>3.1</b>   | <b>17.6</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** 2017-21

| Assessment Area: | Total Loans to Small Businesses |                |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|------------------|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
|                  | #                               | \$             | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Lexington CSA    | 1,222                           | 116,427        | 78.3         | 13,191         | 4.9               | 4.3          | 5.2        | 17.7                   | 14.4         | 17.4        | 39.3                 | 38.2         | 39.8        | 38.1                | 43.1         | 37.6        | 0.0                         | 0.0          | 0.0        |
| Owensboro MSA    | 75                              | 4,726          | 4.8          | 1,984          | 2.8               | 0.0          | 2.8        | 28.7                   | 24.0         | 27.4        | 41.0                 | 50.7         | 40.3        | 27.5                | 25.3         | 29.4        | 0.0                         | 0.0          | 0.0        |
| KY Non-MSA       | 264                             | 9,563          | 16.9         | 1,361          | 0.0               | 0.0          | 0.0        | 4.6                    | 2.7          | 4.6         | 50.6                 | 57.2         | 47.0        | 44.8                | 40.2         | 48.5        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>     | <b>1,561</b>                    | <b>130,716</b> | <b>100.0</b> | <b>16,536</b>  | <b>4.2</b>        | <b>3.3</b>   | <b>4.5</b> | <b>17.6</b>            | <b>12.9</b>  | <b>17.6</b> | <b>40.6</b>          | <b>42.0</b>  | <b>40.5</b> | <b>37.7</b>         | <b>41.8</b>  | <b>37.5</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** 2017-21

| Assessment Area: | Total Loans to Small Businesses |                |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|------------------|---------------------------------|----------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
|                  | #                               | \$             | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Lexington CSA    | 1,222                           | 116,427        | 78.3         | 13,191         | 86.8                              | 70.5         | 39.8        | 3.5                              | 20.0         | 9.7                                    | 9.6          |
| Owensboro MSA    | 75                              | 4,726          | 4.8          | 1,984          | 83.7                              | 66.7         | 40.9        | 4.7                              | 14.7         | 11.7                                   | 18.7         |
| KY Non-MSA       | 264                             | 9,563          | 16.9         | 1,361          | 83.0                              | 81.1         | 41.3        | 3.8                              | 6.8          | 13.2                                   | 12.1         |
| <b>Total</b>     | <b>1,561</b>                    | <b>130,716</b> | <b>100.0</b> | <b>16,536</b>  | <b>86.1</b>                       | <b>72.1</b>  | <b>40.1</b> | <b>3.7</b>                       | <b>17.5</b>  | <b>10.2</b>                            | <b>10.4</b>  |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |               |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              | 2017-21    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |               |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |            | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|                                                                                                                                                              | #                    | \$            | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate  | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| Lexington CSA                                                                                                                                                | 38                   | 3,686         | 35.2         | 312            | 3.3               | 0.0          | 1.3        | 12.5                   | 10.5         | 8.7        | 42.1                 | 57.9         | 41.3        | 42.1                | 31.6         | 48.7        | 0.0                         | 0.0          | 0.0        |
| Owensboro MSA                                                                                                                                                | 1                    | 1             | 0.9          | 259            | 0.2               | 0.0          | 0.0        | 11.3                   | 0.0          | 2.7        | 51.1                 | 100.0        | 54.4        | 37.4                | 0.0          | 42.9        | 0.0                         | 0.0          | 0.0        |
| KY Non-MSA                                                                                                                                                   | 69                   | 8,194         | 63.9         | 217            | 0.0               | 0.0          | 0.0        | 1.1                    | 0.0          | 0.5        | 58.3                 | 79.7         | 56.2        | 40.6                | 20.3         | 43.3        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                                 | <b>108</b>           | <b>11,881</b> | <b>100.0</b> | <b>788</b>     | <b>2.3</b>        | <b>0.0</b>   | <b>0.5</b> | <b>10.5</b>            | <b>3.7</b>   | <b>4.4</b> | <b>45.9</b>          | <b>72.2</b>  | <b>49.7</b> | <b>41.2</b>         | <b>24.1</b>  | <b>45.3</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |               |              |                |                   |              |            |                        |              |            |                      |              |             |                     |              |             |                             |              |            |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |        |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |        |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$     | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Lexington CSA                                                                                                                                                | 38                   | 3,686  | 35.2       | 312            | 96.6                         | 71.1         | 56.4      | 2.0                         | 28.9         | 1.4                               | 0.0          |
| Owensboro MSA                                                                                                                                                | 1                    | 1      | 0.9        | 259            | 98.4                         | 100.0        | 64.9      | 1.1                         | 0.0          | 0.5                               | 0.0          |
| KY Non-MSA                                                                                                                                                   | 69                   | 8,194  | 63.9       | 217            | 98.5                         | 66.7         | 51.2      | 0.7                         | 14.5         | 0.8                               | 18.8         |
| Total                                                                                                                                                        | 108                  | 11,881 | 100.0      | 788            | 97.2                         | 68.5         | 57.7      | 1.7                         | 19.4         | 1.2                               | 12.0         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |        |            |                |                              |              |           |                             |              |                                   |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |                  |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              | 2017-21    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |                  |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|                                                                                                                                                          | #                         | \$               | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |
| Detroit CSA                                                                                                                                              | 16,559                    | 2,626,942        | 33.2         | 272,170        | 6.1                               | 3.9          | 2.5        | 18.5                              | 16.3         | 13.3        | 38.6                              | 39.6         | 39.6        | 36.6                              | 40.2         | 44.5        | 0.1                               | 0.0          | 0.1        |
| Grand Rapids CSA                                                                                                                                         | 19,987                    | 2,787,714        | 40.1         | 79,822         | 2.1                               | 2.1          | 1.8        | 15.1                              | 13.9         | 14.3        | 53.0                              | 51.0         | 51.1        | 29.9                              | 32.9         | 32.8        | 0.0                               | 0.0          | 0.0        |
| Jackson MSA                                                                                                                                              | 555                       | 62,889           | 1.1          | 7,462          | 5.7                               | 4.9          | 3.2        | 15.6                              | 14.6         | 14.9        | 53.7                              | 53.5         | 53.1        | 25.0                              | 27.0         | 28.7        | 0.0                               | 0.0          | 0.0        |
| Kalamazoo CSA                                                                                                                                            | 3,523                     | 494,771          | 7.1          | 21,598         | 4.3                               | 2.6          | 2.6        | 15.0                              | 15.2         | 13.5        | 51.2                              | 39.4         | 49.2        | 29.5                              | 42.7         | 34.6        | 0.0                               | 0.1          | 0.1        |
| Lansing MSA                                                                                                                                              | 3,843                     | 461,292          | 7.7          | 24,799         | 2.5                               | 1.3          | 2.3        | 16.5                              | 13.5         | 15.1        | 50.8                              | 49.4         | 48.6        | 30.1                              | 35.6         | 34.0        | 0.1                               | 0.2          | 0.1        |
| Saginaw CSA                                                                                                                                              | 653                       | 73,820           | 1.3          | 14,583         | 4.4                               | 1.4          | 1.3        | 14.4                              | 12.3         | 11.1        | 51.3                              | 47.6         | 50.9        | 30.0                              | 38.7         | 36.8        | 0.0                               | 0.0          | 0.0        |
| MI Non-MSA                                                                                                                                               | 4,754                     | 703,300          | 9.5          | 24,435         | 0.0                               | 0.0          | 0.0        | 6.3                               | 5.6          | 4.9         | 70.4                              | 64.3         | 66.3        | 23.3                              | 30.0         | 28.8        | 0.0                               | 0.1          | 0.0        |
| <b>Total</b>                                                                                                                                             | <b>49,874</b>             | <b>7,210,728</b> | <b>100.0</b> | <b>444,869</b> | <b>4.7</b>                        | <b>2.5</b>   | <b>2.2</b> | <b>16.6</b>                       | <b>14.0</b>  | <b>13.1</b> | <b>45.3</b>                       | <b>47.5</b>  | <b>44.7</b> | <b>33.3</b>                       | <b>36.0</b>  | <b>39.9</b> | <b>0.1</b>                        | <b>0.0</b>   | <b>0.0</b> |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |                  |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              |            |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Detroit CSA                                                                                                                                              | 16,559                    | 2,626,942 | 33.2       | 272,170        | 22.8                 | 15.3         | 9.5       | 16.5                      | 21.4         | 19.8      | 19.1                    | 22.0         | 23.2      | 41.6                   | 36.1         | 34.7      | 0.0                            | 5.1          | 12.7      |
| Grand Rapids CSA                                                                                                                                         | 19,987                    | 2,787,714 | 40.1       | 79,822         | 19.5                 | 13.4         | 8.1       | 17.6                      | 23.4         | 21.4      | 22.0                    | 23.8         | 23.4      | 40.8                   | 33.9         | 35.2      | 0.0                            | 5.5          | 11.9      |
| Jackson MSA                                                                                                                                              | 555                       | 62,889    | 1.1        | 7,462          | 22.3                 | 8.6          | 6.7       | 17.5                      | 19.8         | 19.2      | 20.2                    | 29.4         | 23.4      | 40.0                   | 36.9         | 35.8      | 0.0                            | 5.2          | 14.9      |
| Kalamazoo CSA                                                                                                                                            | 3,523                     | 494,771   | 7.1        | 21,598         | 20.6                 | 12.7         | 8.9       | 17.3                      | 26.9         | 21.0      | 20.5                    | 24.2         | 23.6      | 41.5                   | 32.8         | 35.2      | 0.0                            | 3.4          | 11.2      |
| Lansing MSA                                                                                                                                              | 3,843                     | 461,292   | 7.7        | 24,799         | 21.0                 | 12.5         | 9.7       | 17.3                      | 25.8         | 22.9      | 20.7                    | 26.1         | 23.9      | 41.0                   | 33.3         | 31.3      | 0.0                            | 2.4          | 12.3      |
| Saginaw CSA                                                                                                                                              | 653                       | 73,820    | 1.3        | 14,583         | 20.5                 | 11.2         | 9.1       | 17.5                      | 21.4         | 20.1      | 21.1                    | 23.6         | 23.0      | 40.9                   | 39.1         | 35.8      | 0.0                            | 4.7          | 12.0      |
| MI Non-MSA                                                                                                                                               | 4,754                     | 703,300   | 9.5        | 24,435         | 19.0                 | 8.5          | 5.1       | 17.5                      | 19.4         | 15.9      | 21.9                    | 23.9         | 20.8      | 41.5                   | 44.8         | 47.2      | 0.0                            | 3.4          | 11.1      |
| Total                                                                                                                                                    | 49,874                    | 7,210,728 | 100.0      | 444,869        | 21.7                 | 13.4         | 8.9       | 16.9                      | 22.7         | 20.1      | 20.0                    | 23.5         | 23.2      | 41.3                   | 35.7         | 35.4      | 0.0                            | 4.8          | 12.4      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Detroit CSA                                                                                                                                                  | 9,370                           | 1,248,408 | 46.6       | 115,446        | 8.0               | 5.6          | 7.1       | 19.4                   | 19.9         | 19.0      | 32.8                 | 35.8         | 32.4      | 38.8                | 37.8         | 40.6      | 0.9                         | 1.0          | 0.9       |
| Grand Rapids CSA                                                                                                                                             | 5,926                           | 738,912   | 29.5       | 25,563         | 3.5               | 4.1          | 3.6       | 16.2                   | 13.3         | 16.3      | 47.2                 | 45.6         | 47.2      | 33.1                | 36.9         | 32.9      | 0.0                         | 0.0          | 0.0       |
| Jackson MSA                                                                                                                                                  | 234                             | 37,092    | 1.2        | 1,876          | 8.9               | 6.4          | 10.1      | 27.3                   | 38.0         | 28.6      | 42.4                 | 35.0         | 38.9      | 21.3                | 20.5         | 22.5      | 0.1                         | 0.0          | 0.0       |
| Kalamazoo CSA                                                                                                                                                | 1,080                           | 142,720   | 5.4        | 6,016          | 7.3               | 6.8          | 7.3       | 21.8                   | 24.6         | 22.5      | 44.1                 | 39.4         | 42.7      | 26.4                | 29.1         | 27.4      | 0.3                         | 0.1          | 0.1       |
| Lansing MSA                                                                                                                                                  | 1,299                           | 150,046   | 6.5        | 7,169          | 6.6               | 7.2          | 7.4       | 19.8                   | 15.5         | 19.3      | 39.5                 | 40.3         | 37.6      | 31.7                | 36.0         | 34.6      | 2.4                         | 1.0          | 1.1       |
| Saginaw CSA                                                                                                                                                  | 377                             | 55,834    | 1.9        | 4,959          | 5.2               | 3.7          | 4.7       | 18.1                   | 20.4         | 17.0      | 44.7                 | 46.2         | 44.0      | 32.0                | 29.7         | 34.3      | 0.0                         | 0.0          | 0.0       |
| MI Non-MSA                                                                                                                                                   | 1,801                           | 211,326   | 9.0        | 9,846          | 0.7               | 0.3          | 0.6       | 8.6                    | 7.5          | 7.1       | 62.7                 | 66.4         | 63.8      | 28.0                | 25.8         | 28.5      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 20,087                          | 2,584,338 | 100.0      | 170,875        | 6.7               | 4.8          | 6.2       | 18.5                   | 17.1         | 18.1      | 38.1                 | 42.1         | 37.4      | 35.9                | 35.5         | 37.7      | 0.8                         | 0.5          | 0.7       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |                  |              |                |                                   |              |             |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------|--------------|----------------|-----------------------------------|--------------|-------------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |                  |              |                | Businesses with Revenues <= \$1MM |              |             | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$               | % of Total   | Overall Market | % Businesses                      | % Bank Loans | Aggregate   | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Detroit CSA                                                                                                                                                  | 9,370                           | 1,248,408        | 46.6         | 115,446        | 86.9                              | 58.6         | 41.5        | 4.9                              | 30.0         | 8.2                                    | 11.3         |
| Grand Rapids CSA                                                                                                                                             | 5,926                           | 738,912          | 29.5         | 25,563         | 83.7                              | 59.9         | 36.1        | 6.2                              | 27.1         | 10.1                                   | 12.9         |
| Jackson MSA                                                                                                                                                  | 234                             | 37,092           | 1.2          | 1,876          | 82.4                              | 50.9         | 42.0        | 6.3                              | 38.0         | 11.4                                   | 11.1         |
| Kalamazoo CSA                                                                                                                                                | 1,080                           | 142,720          | 5.4          | 6,016          | 81.6                              | 56.3         | 36.0        | 6.0                              | 32.2         | 12.4                                   | 11.5         |
| Lansing MSA                                                                                                                                                  | 1,299                           | 150,046          | 6.5          | 7,169          | 83.1                              | 59.6         | 41.9        | 4.9                              | 29.4         | 12.0                                   | 11.0         |
| Saginaw CSA                                                                                                                                                  | 377                             | 55,834           | 1.9          | 4,959          | 80.5                              | 52.5         | 36.4        | 5.8                              | 31.0         | 13.7                                   | 16.4         |
| MI Non-MSA                                                                                                                                                   | 1,801                           | 211,326          | 9.0          | 9,846          | 83.9                              | 61.9         | 38.9        | 5.0                              | 23.6         | 11.2                                   | 14.5         |
| <b>Total</b>                                                                                                                                                 | <b>20,087</b>                   | <b>2,584,338</b> | <b>100.0</b> | <b>170,875</b> | <b>85.6</b>                       | <b>59.0</b>  | <b>40.2</b> | <b>5.2</b>                       | <b>28.8</b>  | <b>9.3</b>                             | <b>12.2</b>  |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |                  |              |                |                                   |              |             |                                  |              |                                        |              |



| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| Detroit CSA                                                                                                                                                  | 25                   | 461   | 21.4       | 720            | 4.7               | 4.0          | 2.6       | 14.9                   | 16.0         | 11.7      | 45.8                 | 40.0         | 53.2      | 34.4                | 40.0         | 32.4      | 0.3                         | 0.0          | 0.1       |
| Grand Rapids CSA                                                                                                                                             | 32                   | 1,060 | 27.4       | 530            | 1.2               | 0.0          | 0.6       | 11.3                   | 0.0          | 11.5      | 56.3                 | 65.6         | 59.2      | 31.3                | 34.4         | 28.7      | 0.0                         | 0.0          | 0.0       |
| Jackson MSA                                                                                                                                                  | 5                    | 73    | 4.3        | 56             | 1.6               | 0.0          | 0.0       | 8.9                    | 0.0          | 10.7      | 66.1                 | 100.0        | 64.3      | 23.5                | 0.0          | 25.0      | 0.0                         | 0.0          | 0.0       |
| Kalamazoo CSA                                                                                                                                                | 4                    | 105   | 3.4        | 166            | 2.4               | 0.0          | 0.0       | 10.3                   | 0.0          | 3.6       | 62.8                 | 66.7         | 77.1      | 24.3                | 66.7         | 19.3      | 0.1                         | 0.0          | 0.0       |
| Lansing MSA                                                                                                                                                  | 15                   | 191   | 12.8       | 183            | 2.0               | 0.0          | 0.5       | 7.8                    | 0.0          | 3.8       | 62.0                 | 53.3         | 72.1      | 27.6                | 46.7         | 23.5      | 0.7                         | 0.0          | 0.0       |
| Saginaw CSA                                                                                                                                                  | 0                    | 0     | 0.0        | 175            | 0.8               | 0.0          | 0.0       | 7.5                    | 0.0          | 2.9       | 58.7                 | 0.0          | 64.0      | 33.0                | 0.0          | 33.1      | 0.0                         | 0.0          | 0.0       |
| MI Non-MSA                                                                                                                                                   | 36                   | 3,508 | 30.8       | 432            | 0.0               | 0.0          | 0.2       | 3.9                    | 8.3          | 2.8       | 75.4                 | 77.8         | 82.9      | 20.6                | 13.9         | 14.1      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 117                  | 5,398 | 100.0      | 2,262          | 2.8               | 0.9          | 1.1       | 11.4                   | 6.0          | 8.0       | 55.1                 | 63.2         | 64.7      | 30.5                | 29.9         | 26.2      | 0.2                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues

2017-21

| Assessment Area: | Total Loans to Farms |              |              |                | Farms with Revenues <= \$1MM |              |             | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|------------------|----------------------|--------------|--------------|----------------|------------------------------|--------------|-------------|-----------------------------|--------------|-----------------------------------|--------------|
|                  | #                    | \$           | % of Total   | Overall Market | % Farms                      | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Detroit CSA      | 25                   | 461          | 21.4         | 720            | 96.0                         | 92.0         | 53.9        | 2.4                         | 4.0          | 1.6                               | 4.0          |
| Grand Rapids CSA | 32                   | 1,060        | 27.4         | 530            | 94.5                         | 71.9         | 35.7        | 4.1                         | 9.4          | 1.4                               | 18.8         |
| Jackson MSA      | 5                    | 73           | 4.3          | 56             | 98.4                         | 100.0        | 25.0        | 0.9                         | 0.0          | 0.7                               | 0.0          |
| Kalamazoo CSA    | 4                    | 105          | 3.4          | 166            | 94.4                         | 75.0         | 33.7        | 3.6                         | 0.0          | 2.0                               | 25.0         |
| Lansing MSA      | 15                   | 191          | 12.8         | 183            | 96.5                         | 73.3         | 26.8        | 2.0                         | 0.0          | 1.5                               | 26.7         |
| Saginaw CSA      | 0                    | 0            | 0.0          | 175            | 97.4                         | 0.0          | 45.1        | 1.5                         | 0.0          | 1.1                               | 0.0          |
| MI Non-MSA       | 36                   | 3,508        | 30.8         | 432            | 96.1                         | 77.8         | 42.4        | 2.7                         | 22.2         | 1.2                               | 0.0          |
| <b>Total</b>     | <b>117</b>           | <b>5,398</b> | <b>100.0</b> | <b>2,262</b>   | <b>95.8</b>                  | <b>79.5</b>  | <b>42.4</b> | <b>2.7</b>                  | <b>10.3</b>  | <b>1.5</b>                        | <b>10.3</b>  |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** 2017-21

| Assessment Area: | Total Home Mortgage Loans |                  |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|------------------|---------------------------|------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
|                  | #                         | \$               | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |
| Charlotte CSA    | 8,648                     | 1,685,523        | 75.4         | 144,508        | 2.8                               | 2.4          | 2.5        | 17.8                              | 17.1         | 14.2        | 37.9                              | 33.9         | 32.1        | 41.5                              | 46.6         | 51.1        | 0.0                               | 0.1          | 0.1        |
| Asheville CSA    | 600                       | 104,449          | 5.2          | 19,543         | 0.6                               | 0.7          | 0.7        | 7.7                               | 3.3          | 8.4         | 70.4                              | 75.3         | 66.7        | 21.3                              | 21.0         | 24.3        | 0.0                               | 0.0          | 0.0        |
| Hickory MSA      | 258                       | 47,753           | 2.2          | 8,178          | 0.0                               | 0.0          | 0.0        | 8.5                               | 3.5          | 7.3         | 64.2                              | 45.7         | 56.3        | 27.2                              | 50.8         | 36.4        | 0.0                               | 0.0          | 0.0        |
| Raleigh CSA      | 1,614                     | 488,856          | 14.1         | 118,494        | 2.3                               | 0.9          | 2.4        | 17.2                              | 10.7         | 15.2        | 34.6                              | 32.3         | 33.4        | 45.8                              | 56.1         | 48.9        | 0.0                               | 0.0          | 0.0        |
| NC Non-MSA       | 351                       | 47,268           | 3.1          | 5,865          | 0.0                               | 0.0          | 0.0        | 17.0                              | 15.4         | 12.1        | 74.8                              | 72.9         | 72.6        | 8.3                               | 11.7         | 15.3        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>11,471</b>             | <b>2,373,848</b> | <b>100.0</b> | <b>296,588</b> | <b>2.2</b>                        | <b>2.0</b>   | <b>2.2</b> | <b>16.2</b>                       | <b>15.1</b>  | <b>14.0</b> | <b>42.3</b>                       | <b>37.3</b>  | <b>36.4</b> | <b>39.2</b>                       | <b>45.6</b>  | <b>47.4</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** 2017-21

| Assessment Area: | Total Home Mortgage Loans |                  |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|------------------|---------------------------|------------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
|                  | #                         | \$               | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Charlotte CSA    | 8,648                     | 1,685,523        | 75.4         | 144,508        | 21.6                 | 12.8         | 4.4        | 16.5                      | 19.2         | 13.9        | 18.7                    | 18.6         | 18.8        | 43.2                   | 41.1         | 47.4        | 0.0                            | 8.3          | 15.4        |
| Asheville CSA    | 600                       | 104,449          | 5.2          | 19,543         | 19.4                 | 5.7          | 4.7        | 18.8                      | 19.5         | 15.2        | 20.4                    | 23.0         | 20.5        | 41.4                   | 45.5         | 46.6        | 0.0                            | 6.3          | 13.0        |
| Hickory MSA      | 258                       | 47,753           | 2.2          | 8,178          | 18.1                 | 5.0          | 4.6        | 17.8                      | 16.7         | 16.5        | 20.4                    | 19.4         | 19.4        | 43.8                   | 52.3         | 43.7        | 0.0                            | 6.6          | 15.9        |
| Raleigh CSA      | 1,614                     | 488,856          | 14.1         | 118,494        | 20.7                 | 4.6          | 5.1        | 16.1                      | 14.1         | 14.8        | 18.3                    | 13.4         | 20.1        | 44.9                   | 52.4         | 46.0        | 0.0                            | 15.5         | 13.9        |
| NC Non-MSA       | 351                       | 47,268           | 3.1          | 5,865          | 22.3                 | 8.8          | 2.9        | 20.2                      | 21.7         | 12.4        | 21.5                    | 20.2         | 17.2        | 36.1                   | 44.2         | 55.7        | 0.0                            | 5.1          | 11.9        |
| <b>Total</b>     | <b>11,471</b>             | <b>2,373,848</b> | <b>100.0</b> | <b>296,588</b> | <b>21.0</b>          | <b>11.0</b>  | <b>4.7</b> | <b>16.8</b>               | <b>18.5</b>  | <b>14.4</b> | <b>18.9</b>             | <b>18.2</b>  | <b>19.4</b> | <b>43.4</b>            | <b>43.3</b>  | <b>46.9</b> | <b>0.0</b>                     | <b>9.1</b>   | <b>14.6</b> |

Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Charlotte CSA                                                                                                                                                | 4,698                           | 392,292 | 79.4       | 59,427         | 6.4               | 7.0          | 6.5       | 17.5                   | 17.2         | 16.5      | 29.2                 | 30.8         | 29.1      | 46.3                | 44.4         | 47.3      | 0.7                         | 0.5          | 0.6       |
| Asheville CSA                                                                                                                                                | 246                             | 19,694  | 4.2        | 10,465         | 2.9               | 0.8          | 2.8       | 11.3                   | 6.9          | 12.6      | 55.7                 | 78.0         | 54.5      | 30.1                | 14.2         | 30.1      | 0.0                         | 0.0          | 0.0       |
| Hickory MSA                                                                                                                                                  | 78                              | 5,020   | 1.3        | 3,417          | 0.0               | 0.0          | 0.0       | 18.1                   | 12.8         | 21.4      | 46.7                 | 41.0         | 42.2      | 35.2                | 46.2         | 36.4      | 0.0                         | 0.0          | 0.0       |
| Raleigh CSA                                                                                                                                                  | 716                             | 81,169  | 12.1       | 45,867         | 4.6               | 5.7          | 4.4       | 18.8                   | 20.5         | 18.0      | 31.8                 | 30.7         | 32.0      | 44.2                | 43.0         | 45.2      | 0.6                         | 0.0          | 0.4       |
| NC Non-MSA                                                                                                                                                   | 176                             | 6,135   | 3.0        | 2,185          | 0.0               | 0.0          | 0.0       | 19.7                   | 9.1          | 19.2      | 70.3                 | 89.2         | 73.2      | 10.0                | 1.7          | 7.6       | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 5,914                           | 504,310 | 100.0      | 121,361        | 5.1               | 6.3          | 5.1       | 17.5                   | 16.9         | 16.9      | 33.6                 | 34.7         | 33.6      | 43.2                | 41.7         | 44.0      | 0.5                         | 0.4          | 0.5       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |         |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Charlotte CSA                                                                                                                                                | 4,698                           | 392,292 | 79.4       | 59,427         | 88.9                              | 70.1         | 41.2      | 3.4                              | 17.5         | 7.7                                    | 12.4         |
| Asheville CSA                                                                                                                                                | 246                             | 19,694  | 4.2        | 10,465         | 89.8                              | 74.4         | 40.2      | 3.1                              | 17.5         | 7.1                                    | 8.1          |
| Hickory MSA                                                                                                                                                  | 78                              | 5,020   | 1.3        | 3,417          | 83.9                              | 66.7         | 35.8      | 5.5                              | 12.8         | 10.6                                   | 20.5         |
| Raleigh CSA                                                                                                                                                  | 716                             | 81,169  | 12.1       | 45,867         | 89.1                              | 57.7         | 42.4      | 3.1                              | 22.3         | 7.8                                    | 20.0         |
| NC Non-MSA                                                                                                                                                   | 176                             | 6,135   | 3.0        | 2,185          | 86.4                              | 81.3         | 42.7      | 3.8                              | 5.7          | 9.8                                    | 13.1         |
| Total                                                                                                                                                        | 5,914                           | 504,310 | 100.0      | 121,361        | 88.9                              | 69.1         | 41.4      | 3.3                              | 17.7         | 7.8                                    | 13.3         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                                   |              |           |                                  |              |                                        |              |

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2017-21**

| Assessment Area: | Total Loans to Farms |              |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|------------------|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
|                  | #                    | \$           | % of Total   | Overall Market | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate   | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | Aggregate  |
| Charlotte CSA    | 36                   | 2,707        | 78.3         | 295            | 3.9               | 0.0          | 1.7        | 16.3                   | 11.1         | 13.6        | 46.1                 | 72.2         | 60.7        | 33.5                | 16.7         | 24.1        | 0.2                         | 0.0          | 0.0        |
| Asheville CSA    | 2                    | 26           | 4.6          | 48             | 0.7               | 0.0          | 4.2        | 9.5                    | 0.0          | 6.3         | 69.4                 | 100.0        | 70.8        | 20.4                | 0.0          | 18.8        | 0.0                         | 0.0          | 0.0        |
| Hickory MSA      | 0                    | 0            | 0.0          | 28             | 0.0               | 0.0          | 0.0        | 8.6                    | 0.0          | 7.1         | 62.0                 | 0.0          | 85.7        | 29.4                | 0.0          | 7.1         | 0.0                         | 0.0          | 0.0        |
| Raleigh CSA      | 1                    | 311          | 2.2          | 143            | 2.9               | 0.0          | 2.1        | 16.0                   | 0.0          | 11.9        | 42.9                 | 100.0        | 47.6        | 38.1                | 0.0          | 38.5        | 0.1                         | 0.0          | 0.0        |
| NC Non-MSA       | 7                    | 213          | 15.2         | 82             | 0.0               | 0.0          | 0.0        | 13.1                   | 0.0          | 15.9        | 77.3                 | 100.0        | 79.3        | 9.6                 | 0.0          | 4.9         | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>     | <b>46</b>            | <b>3,257</b> | <b>100.0</b> | <b>596</b>     | <b>2.9</b>        | <b>0.0</b>   | <b>1.7</b> | <b>15.0</b>            | <b>8.7</b>   | <b>12.6</b> | <b>49.8</b>          | <b>78.3</b>  | <b>62.1</b> | <b>32.2</b>         | <b>13.0</b>  | <b>23.7</b> | <b>0.1</b>                  | <b>0.0</b>   | <b>0.0</b> |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%.

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2017-21**

| Assessment Area: | Total Loans to Farms |              |              |                | Farms with Revenues <= \$1MM |              |             | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|------------------|----------------------|--------------|--------------|----------------|------------------------------|--------------|-------------|-----------------------------|--------------|-----------------------------------|--------------|
|                  | #                    | \$           | % of Total   | Overall Market | % Farms                      | % Bank Loans | Aggregate   | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Charlotte CSA    | 36                   | 2,707        | 78.3         | 295            | 96.5                         | 83.3         | 40.3        | 2.1                         | 2.8          | 1.4                               | 13.9         |
| Asheville CSA    | 2                    | 26           | 4.3          | 48             | 98.3                         | 100.0        | 39.6        | 0.7                         | 0.0          | 1.0                               | 0.0          |
| Hickory MSA      | 0                    | 0            | 0.0          | 28             | 96.3                         | 0.0          | 25.0        | 2.2                         | 0.0          | 1.5                               | 0.0          |
| Raleigh CSA      | 1                    | 311          | 2.2          | 143            | 95.9                         | 100.0        | 61.5        | 2.2                         | 0.0          | 1.9                               | 0.0          |
| NC Non-MSA       | 7                    | 213          | 15.2         | 82             | 98.0                         | 57.1         | 52.4        | 1.4                         | 14.3         | 0.7                               | 28.6         |
| <b>Total</b>     | <b>46</b>            | <b>3,257</b> | <b>100.0</b> | <b>596</b>     | <b>96.6</b>                  | <b>80.4</b>  | <b>46.3</b> | <b>2.0</b>                  | <b>4.3</b>   | <b>1.5</b>                        | <b>15.2</b>  |

Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           | 2017-21 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|---------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |         |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |         |
| Columbus CSA                                                                                                                                             | 16,781                    | 2,928,187 | 27.2       | 129,282        | 4.9                               | 4.3          | 4.7       | 18.1                              | 17.1         | 15.8      | 37.6                              | 32.7         | 33.9      | 39.4                              | 45.8         | 45.6      | 0.0                               | 0.0          | 0.0       |         |
| Cleveland CSA                                                                                                                                            | 23,823                    | 3,356,734 | 38.6       | 161,140        | 5.8                               | 3.9          | 3.2       | 15.6                              | 12.6         | 12.5      | 43.1                              | 39.4         | 42.7      | 35.4                              | 44.0         | 41.6      | 0.1                               | 0.0          | 0.0       |         |
| Dayton CSA                                                                                                                                               | 8,935                     | 928,632   | 14.5       | 52,644         | 4.6                               | 2.5          | 2.4       | 15.6                              | 13.4         | 12.8      | 47.0                              | 49.4         | 46.2      | 32.8                              | 34.7         | 38.5      | 0.0                               | 0.0          | 0.0       |         |
| Lima CSA                                                                                                                                                 | 892                       | 76,788    | 1.4        | 5,487          | 1.8                               | 1.8          | 1.1       | 10.6                              | 12.6         | 8.9       | 49.8                              | 51.2         | 48.0      | 37.9                              | 34.6         | 42.0      | 0.0                               | 0.0          | 0.0       |         |
| Toledo CSA                                                                                                                                               | 9,541                     | 1,140,467 | 15.5       | 31,296         | 5.0                               | 2.4          | 1.5       | 12.4                              | 9.8          | 8.7       | 47.5                              | 40.4         | 44.4      | 35.1                              | 47.4         | 45.4      | 0.0                               | 0.0          | 0.0       |         |
| OH Non-MSA                                                                                                                                               | 1,777                     | 169,935   | 2.9        | 7,169          | 0.0                               | 0.0          | 0.0       | 26.1                              | 34.9         | 26.7      | 62.0                              | 59.7         | 60.1      | 11.6                              | 5.3          | 12.8      | 0.2                               | 0.0          | 0.3       |         |
| Total                                                                                                                                                    | 61,749                    | 8,600,741 | 100.0      | 387,018        | 5.1                               | 3.4          | 3.4       | 16.1                              | 14.2         | 13.6      | 43.5                              | 40.0         | 40.8      | 35.2                              | 42.4         | 42.3      | 0.1                               | 0.0          | 0.0       |         |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |         |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Columbus CSA                                                                                                                                             | 16,781                    | 2,928,187 | 27.2       | 129,282        | 22.0                 | 12.4         | 6.9       | 16.9                      | 19.6         | 18.1      | 19.5                    | 21.4         | 20.4      | 41.6                   | 42.0         | 37.8      | 0.0                            | 4.6          | 16.9      |
| Cleveland CSA                                                                                                                                            | 23,823                    | 3,356,734 | 38.6       | 161,140        | 21.9                 | 13.2         | 9.3       | 17.0                      | 20.5         | 19.5      | 20.0                    | 22.5         | 21.7      | 41.1                   | 35.5         | 35.0      | 0.0                            | 8.3          | 14.6      |
| Dayton CSA                                                                                                                                               | 8,935                     | 928,632   | 14.5       | 52,644         | 21.7                 | 15.1         | 7.8       | 17.0                      | 23.4         | 18.9      | 20.2                    | 23.0         | 21.0      | 41.2                   | 34.6         | 33.1      | 0.0                            | 3.8          | 19.2      |
| Lima CSA                                                                                                                                                 | 892                       | 76,788    | 1.4        | 5,487          | 19.1                 | 13.7         | 6.8       | 17.0                      | 23.3         | 20.5      | 20.8                    | 26.1         | 23.6      | 43.1                   | 34.9         | 34.1      | 0.0                            | 2.0          | 15.1      |
| Toledo CSA                                                                                                                                               | 9,541                     | 1,140,467 | 15.5       | 31,296         | 21.8                 | 11.4         | 7.1       | 16.5                      | 21.9         | 19.7      | 20.2                    | 24.6         | 23.0      | 41.5                   | 38.9         | 38.0      | 0.0                            | 3.1          | 12.2      |
| OH Non-MSA                                                                                                                                               | 1,777                     | 169,935   | 2.9        | 7,169          | 24.6                 | 9.6          | 7.2       | 18.7                      | 27.0         | 19.8      | 20.8                    | 30.1         | 23.6      | 36.0                   | 31.6         | 31.8      | 0.0                            | 1.7          | 17.5      |
| Total                                                                                                                                                    | 61,749                    | 8,600,741 | 100.0      | 387,018        | 21.9                 | 12.9         | 8.0       | 17.0                      | 21.1         | 19.0      | 20.0                    | 22.9         | 21.3      | 41.2                   | 37.5         | 35.9      | 0.0                            | 5.6          | 15.8      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Columbus CSA                                                                                                                                                 | 5,091                           | 452,045   | 27.4       | 42,419         | 9.1               | 6.8          | 7.7       | 18.2                   | 16.4         | 15.2      | 30.2                 | 26.9         | 28.0      | 41.9                | 49.7         | 48.9      | 0.5                         | 0.2          | 0.3       |
| Cleveland CSA                                                                                                                                                | 7,146                           | 762,392   | 38.4       | 73,250         | 8.5               | 7.2          | 7.4       | 15.5                   | 11.9         | 13.8      | 36.7                 | 34.1         | 35.7      | 38.3                | 46.3         | 42.3      | 0.9                         | 0.4          | 0.7       |
| Dayton CSA                                                                                                                                                   | 3,030                           | 376,494   | 16.3       | 16,828         | 6.2               | 4.8          | 5.5       | 18.0                   | 17.4         | 17.1      | 43.4                 | 43.5         | 42.2      | 32.4                | 34.3         | 35.2      | 0.0                         | 0.0          | 0.0       |
| Lima CSA                                                                                                                                                     | 146                             | 9,049     | 0.8        | 1,627          | 3.3               | 2.7          | 3.4       | 17.4                   | 24.0         | 15.5      | 42.7                 | 34.9         | 43.0      | 36.6                | 38.4         | 38.1      | 0.0                         | 0.0          | 0.0       |
| Toledo CSA                                                                                                                                                   | 2,841                           | 309,060   | 15.3       | 12,352         | 9.9               | 13.2         | 8.5       | 12.4                   | 9.3          | 11.6      | 42.0                 | 35.7         | 41.7      | 35.7                | 41.9         | 38.2      | 0.1                         | 0.0          | 0.0       |
| OH Non-MSA                                                                                                                                                   | 334                             | 24,886    | 1.8        | 2,363          | 0.6               | 0.0          | 0.1       | 31.0                   | 47.0         | 24.7      | 54.5                 | 49.4         | 59.3      | 10.1                | 3.3          | 13.0      | 3.9                         | 0.3          | 2.9       |
| Total                                                                                                                                                        | 18,588                          | 1,933,926 | 100.0      | 148,839        | 8.3               | 7.4          | 7.2       | 16.7                   | 14.4         | 14.6      | 36.6                 | 34.2         | 35.2      | 37.7                | 43.8         | 42.5      | 0.6                         | 0.2          | 0.5       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |           |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |           |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$        | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Columbus CSA                                                                                                                                                 | 5,091                           | 452,045   | 27.4       | 42,419         | 83.5                              | 65.5         | 41.6      | 4.9                              | 18.1         | 11.6                                   | 16.4         |
| Cleveland CSA                                                                                                                                                | 7,146                           | 762,392   | 38.4       | 73,250         | 83.4                              | 63.5         | 46.5      | 6.0                              | 22.2         | 10.6                                   | 14.3         |
| Dayton CSA                                                                                                                                                   | 3,030                           | 376,494   | 16.3       | 16,828         | 81.1                              | 60.6         | 41.0      | 5.8                              | 26.9         | 13.0                                   | 12.5         |
| Lima CSA                                                                                                                                                     | 146                             | 9,049     | 0.8        | 1,627          | 76.9                              | 69.9         | 32.2      | 6.7                              | 18.5         | 16.3                                   | 11.6         |
| Toledo CSA                                                                                                                                                   | 2,841                           | 309,060   | 15.3       | 12,352         | 79.8                              | 61.7         | 41.5      | 6.5                              | 24.6         | 13.8                                   | 13.8         |
| OH Non-MSA                                                                                                                                                   | 334                             | 24,886    | 1.8        | 2,363          | 79.2                              | 67.4         | 33.5      | 4.9                              | 18.0         | 15.9                                   | 14.7         |
| Total                                                                                                                                                        | 18,588                          | 1,933,926 | 100.0      | 148,839        | 82.6                              | 63.4         | 43.7      | 5.7                              | 22.1         | 11.7                                   | 14.5         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |           |            |                |                                   |              |           |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| Columbus CSA                                                                                                                                                 | 55                   | 2,785 | 22.0       | 605            | 4.5               | 0.0          | 2.8       | 15.2                   | 16.4         | 9.1       | 43.4                 | 49.1         | 52.6      | 36.8                | 34.5         | 35.5      | 0.1                         | 0.0          | 0.0       |
| Cleveland CSA                                                                                                                                                | 17                   | 356   | 6.8        | 757            | 3.7               | 0.0          | 2.0       | 10.4                   | 6.3          | 5.0       | 46.8                 | 62.5         | 52.6      | 39.0                | 37.5         | 40.4      | 0.1                         | 0.0          | 0.0       |
| Dayton CSA                                                                                                                                                   | 61                   | 1,525 | 24.4       | 548            | 2.1               | 0.0          | 0.0       | 9.9                    | 3.3          | 3.5       | 53.2                 | 54.1         | 65.9      | 34.8                | 42.6         | 30.7      | 0.0                         | 0.0          | 0.0       |
| Lima CSA                                                                                                                                                     | 16                   | 318   | 6.4        | 144            | 0.3               | 0.0          | 0.0       | 4.8                    | 0.0          | 0.7       | 56.2                 | 56.3         | 75.7      | 38.7                | 43.8         | 23.6      | 0.0                         | 0.0          | 0.0       |
| Toledo CSA                                                                                                                                                   | 38                   | 1,525 | 15.2       | 486            | 2.3               | 2.6          | 0.8       | 6.5                    | 7.9          | 2.7       | 52.3                 | 60.5         | 62.6      | 38.8                | 28.9         | 34.0      | 0.0                         | 0.0          | 0.0       |
| OH Non-MSA                                                                                                                                                   | 63                   | 1,596 | 25.2       | 284            | 0.0               | 0.0          | 0.0       | 14.7                   | 25.4         | 7.0       | 72.3                 | 73.0         | 67.3      | 12.8                | 1.6          | 25.7      | 0.2                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 250                  | 8,130 | 100.0      | 2,824          | 3.2               | 0.4          | 1.3       | 11.2                   | 12.4         | 5.2       | 49.4                 | 59.2         | 59.5      | 36.2                | 28.0         | 34.0      | 0.1                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |       |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |       |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$    | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Columbus CSA                                                                                                                                                 | 55                   | 2,785 | 22.0       | 605            | 96.1                         | 83.6         | 50.6      | 2.2                         | 0.0          | 1.7                               | 16.4         |
| Cleveland CSA                                                                                                                                                | 17                   | 381   | 6.8        | 757            | 96.2                         | 64.7         | 71.5      | 2.3                         | 0.0          | 1.6                               | 35.3         |
| Dayton CSA                                                                                                                                                   | 61                   | 1,525 | 24.4       | 548            | 96.5                         | 85.2         | 58.8      | 2.0                         | 3.3          | 1.5                               | 11.5         |
| Lima CSA                                                                                                                                                     | 16                   | 318   | 6.4        | 144            | 97.7                         | 75.0         | 65.3      | 1.0                         | 0.0          | 1.3                               | 25.0         |
| Toledo CSA                                                                                                                                                   | 38                   | 1,525 | 15.2       | 486            | 96.5                         | 78.9         | 72.6      | 2.3                         | 5.3          | 1.3                               | 15.8         |
| OH Non-MSA                                                                                                                                                   | 63                   | 1,596 | 25.2       | 284            | 98.1                         | 68.3         | 58.5      | 0.7                         | 7.9          | 1.3                               | 23.8         |
| Total                                                                                                                                                        | 250                  | 8,130 | 100.0      | 2,824          | 96.4                         | 77.6         | 63.1      | 2.1                         | 3.6          | 1.5                               | 18.8         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |       |            |                |                              |              |           |                             |              |                                   |              |



| Table O: 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   | 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  |
| Greenville MSA                                                                                                                                           | 268                       | 71,754        | 100.0        | 33,397         | 3.9                               | 0.7          | 3.3        | 13.9                              | 5.6          | 10.1        | 36.4                              | 29.5         | 36.0        | 45.9                              | 64.2         | 50.7        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>                                                                                                                                             | <b>268</b>                | <b>71,754</b> | <b>100.0</b> | <b>33,397</b>  | <b>3.9</b>                        | <b>0.7</b>   | <b>3.3</b> | <b>13.9</b>                       | <b>5.6</b>   | <b>10.1</b> | <b>36.4</b>                       | <b>29.5</b>  | <b>36.0</b> | <b>45.9</b>                       | <b>64.2</b>  | <b>50.7</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |
| Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |               |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              |            |

| Table P: 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   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Greenville MSA                                                                                                                                           | 268                       | 71,754        | 100.0        | 33,397         | 21.1                 | 3.7          | 5.4        | 15.2                      | 7.5          | 16.7        | 18.1                    | 11.6         | 20.5        | 45.5                   | 34.3         | 39.5        | 0.0                            | 42.9         | 17.9        |
| <b>Total</b>                                                                                                                                             | <b>268</b>                | <b>71,754</b> | <b>100.0</b> | <b>33,397</b>  | <b>21.1</b>          | <b>3.7</b>   | <b>5.4</b> | <b>15.2</b>               | <b>7.5</b>   | <b>16.7</b> | <b>18.1</b>             | <b>11.6</b>  | <b>20.5</b> | <b>45.5</b>            | <b>34.3</b>  | <b>39.5</b> | <b>0.0</b>                     | <b>42.9</b>  | <b>17.9</b> |
| Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |               |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              |             |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 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 | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Greenville MSA                                                                                                                                               | 11                              | 2,801 | 100.0      | 13,760         | 6.9               | 18.2         | 6.7       | 14.8                   | 27.3         | 13.0      | 32.0                 | 18.2         | 30.2      | 46.3                | 36.4         | 50.0      | 0.0                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 11                              | 2,801 | 100.0      | 13,760         | 6.9               | 18.2         | 6.7       | 14.8                   | 27.3         | 13.0      | 32.0                 | 18.2         | 30.2      | 46.3                | 36.4         | 50.0      | 0.0                         | 0.0          | 0.0       |
| Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |       |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: 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 | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Greenville MSA                                                                                                                                               | 11                              | 2,801 | 100.0      | 13,760         | 83.6                              | 54.5         | 40.8      | 5.2                              | 27.3         | 11.2                                   | 18.2         |
| Total                                                                                                                                                        | 11                              | 2,801 | 100.0      | 13,760         | 83.6                              | 54.5         | 40.8      | 5.2                              | 27.3         | 11.2                                   | 18.2         |
| Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |       |            |                |                                   |              |           |                                  |              |                                        |              |

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography                                                         |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              | 2017-21   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Tracts                 |              |           | Moderate-Income Tracts            |              |           | Middle-Income Tracts              |              |           | Upper-Income Tracts               |              |           | Not Available-Income Tracts       |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Nashville MSA                                                                                                                                            | 5,089                     | 1,277,480 | 91.3       | 112,139        | 3.8                               | 3.6          | 5.0       | 15.8                              | 13.5         | 13.3      | 39.7                              | 33.1         | 37.4      | 40.6                              | 49.7         | 44.3      | 0.1                               | 0.1          | 0.1       |
| Knoxville MSA                                                                                                                                            | 486                       | 99,249    | 8.7        | 29,108         | 3.2                               | 3.2          | 2.6       | 12.1                              | 8.8          | 9.8       | 42.6                              | 37.0         | 39.1      | 42.0                              | 51.6         | 48.5      | 0.0                               | 0.0          | 0.0       |
| Total                                                                                                                                                    | 5,575                     | 1,376,729 | 100.0      | 141,247        | 3.6                               | 3.5          | 4.5       | 14.8                              | 13.1         | 12.5      | 40.5                              | 33.5         | 37.7      | 41.0                              | 49.8         | 45.2      | 0.1                               | 0.1          | 0.1       |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |                                   |              |           |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower                                                          |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           | 2017-21                        |              |           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                         | Total Home Mortgage Loans |           |            |                | Low-Income Borrowers |              |           | Moderate-Income Borrowers |              |           | Middle-Income Borrowers |              |           | Upper-Income Borrowers |              |           | Not Available-Income Borrowers |              |           |
|                                                                                                                                                          | #                         | \$        | % of Total | Overall Market | % Families           | % Bank Loans | Aggregate | % Families                | % Bank Loans | Aggregate | % Families              | % Bank Loans | Aggregate | % Families             | % Bank Loans | Aggregate | % Families                     | % Bank Loans | Aggregate |
| Nashville MSA                                                                                                                                            | 5,089                     | 1,277,480 | 91.3       | 112,139        | 20.0                 | 6.5          | 4.7       | 16.7                      | 16.8         | 15.4      | 19.8                    | 18.7         | 18.5      | 43.5                   | 43.7         | 42.6      | 0.0                            | 14.3         | 18.8      |
| Knoxville MSA                                                                                                                                            | 486                       | 99,249    | 8.7        | 29,108         | 20.1                 | 8.2          | 5.1       | 15.4                      | 13.6         | 16.0      | 18.9                    | 17.9         | 18.6      | 45.7                   | 48.8         | 43.0      | 0.0                            | 11.5         | 17.3      |
| Total                                                                                                                                                    | 5,575                     | 1,376,729 | 100.0      | 141,247        | 20.0                 | 6.7          | 4.7       | 16.4                      | 16.5         | 15.5      | 19.6                    | 18.6         | 18.5      | 44.0                   | 44.2         | 42.7      | 0.0                            | 14.0         | 18.5      |
| Source: 2015 ACS; 01/01/2017 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                           |           |            |                |                      |              |           |                           |              |           |                         |              |           |                        |              |           |                                |              |           |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography                                                       |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses      | % Bank Loans | Aggregate | % Businesses           | % Bank Loans | Aggregate | % Businesses         | % Bank Loans | Aggregate | % Businesses        | % Bank Loans | Aggregate | % Businesses                | % Bank Loans | Aggregate |
| Nashville MSA                                                                                                                                                | 2,264                           | 133,391 | 93.3       | 44,032         | 7.8               | 6.1          | 8.3       | 18.3                   | 18.3         | 17.8      | 27.6                 | 28.4         | 26.2      | 45.3                | 45.9         | 46.9      | 0.9                         | 1.3          | 0.9       |
| Knoxville MSA                                                                                                                                                | 163                             | 17,080  | 6.7        | 11,369         | 4.7               | 6.1          | 3.3       | 14.0                   | 22.7         | 11.9      | 32.0                 | 28.8         | 31.5      | 48.8                | 42.3         | 53.2      | 0.5                         | 0.0          | 0.1       |
| Total                                                                                                                                                        | 2,427                           | 150,471 | 100.0      | 55,401         | 7.2               | 6.1          | 7.3       | 17.4                   | 18.6         | 16.6      | 28.5                 | 28.5         | 27.3      | 46.1                | 45.7         | 48.2      | 0.8                         | 1.2          | 0.7       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues                                                                  |                                 |         |            |                |                                   |              |           |                                  |              |                                        | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|------------|----------------|-----------------------------------|--------------|-----------|----------------------------------|--------------|----------------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Small Businesses |         |            |                | Businesses with Revenues <= \$1MM |              |           | Businesses with Revenues > \$1MM |              | Businesses with Revenues Not Available |              |
|                                                                                                                                                              | #                               | \$      | % of Total | Overall Market | % Businesses                      | % Bank Loans | Aggregate | % Businesses                     | % Bank Loans | % Businesses                           | % Bank Loans |
| Nashville MSA                                                                                                                                                | 2,264                           | 133,391 | 93.3       | 44,032         | 88.3                              | 68.3         | 41.3      | 3.7                              | 11.4         | 8.1                                    | 20.3         |
| Knoxville MSA                                                                                                                                                | 163                             | 17,080  | 6.7        | 11,369         | 84.9                              | 53.4         | 39.2      | 4.7                              | 25.8         | 10.3                                   | 20.9         |
| Total                                                                                                                                                        | 2,427                           | 150,471 | 100.0      | 55,401         | 87.6                              | 67.3         | 40.9      | 3.9                              | 12.4         | 8.5                                    | 20.4         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                                 |         |            |                |                                   |              |           |                                  |              |                                        |              |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography                                                                 |                      |     |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              | 2017-21   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |     |            |                | Low-Income Tracts |              |           | Moderate-Income Tracts |              |           | Middle-Income Tracts |              |           | Upper-Income Tracts |              |           | Not Available-Income Tracts |              |           |
|                                                                                                                                                              | #                    | \$  | % of Total | Overall Market | % Farms           | % Bank Loans | Aggregate | % Farms                | % Bank Loans | Aggregate | % Farms              | % Bank Loans | Aggregate | % Farms             | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | Aggregate |
| Nashville MSA                                                                                                                                                | 8                    | 144 | 100.0      | 189            | 4.5               | 12.5         | 2.6       | 14.5                   | 0.0          | 20.6      | 36.8                 | 25.0         | 42.3      | 43.6                | 62.5         | 33.9      | 0.6                         | 0.0          | 0.5       |
| Knoxville MSA                                                                                                                                                | 0                    | 0   | 0.0        | 21             | 3.0               | 0.0          | 0.0       | 12.1                   | 0.0          | 0.0       | 37.8                 | 0.0          | 47.6      | 46.6                | 0.0          | 52.4      | 0.5                         | 0.0          | 0.0       |
| Total                                                                                                                                                        | 8                    | 144 | 100.0      | 210            | 4.2               | 12.5         | 2.4       | 14.0                   | 0.0          | 18.6      | 37.0                 | 25.0         | 42.9      | 44.3                | 62.5         | 35.7      | 0.6                         | 0.0          | 0.5       |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |     |            |                |                   |              |           |                        |              |           |                      |              |           |                     |              |           |                             |              |           |

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues                                                                             |                      |     |            |                |                              |              |           |                             |              |                                   | 2017-21      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----|------------|----------------|------------------------------|--------------|-----------|-----------------------------|--------------|-----------------------------------|--------------|
| Assessment Area:                                                                                                                                             | Total Loans to Farms |     |            |                | Farms with Revenues <= \$1MM |              |           | Farms with Revenues > \$1MM |              | Farms with Revenues Not Available |              |
|                                                                                                                                                              | #                    | \$  | % of Total | Overall Market | % Farms                      | % Bank Loans | Aggregate | % Farms                     | % Bank Loans | % Farms                           | % Bank Loans |
| Nashville MSA                                                                                                                                                | 8                    | 144 | 100.0      | 189            | 96.0                         | 75.0         | 49.2      | 1.8                         | 12.5         | 2.1                               | 12.5         |
| Knoxville MSA                                                                                                                                                | 0                    | 0   | 0.0        | 21             | 96.1                         | 0.0          | 57.1      | 1.9                         | 0.0          | 2.0                               | 0.0          |
| Total                                                                                                                                                        | 8                    | 144 | 100.0      | 210            | 96.0                         | 75.0         | 50.0      | 1.8                         | 12.5         | 2.1                               | 12.5         |
| Source: 2021 D&B Data; 01/01/2017 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0%. |                      |     |            |                |                              |              |           |                             |              |                                   |              |

**Public Exhibit 7**

**Comerica Bank Community Reinvestment Act Performance Evaluation,  
dated July 17, 2023**

**PUBLIC DISCLOSURE**

July 17, 2023

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Comerica Bank  
RSSD # 60143  
1717 Main Street  
Dallas, Texas 75201

Federal Reserve Bank of Dallas  
2200 North Pearl Street  
Dallas, Texas 75201

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, nor should it 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.

## TABLE OF CONTENTS

|                                                             |    |
|-------------------------------------------------------------|----|
| INSTITUTION RATING .....                                    | 1  |
| Overall Rating .....                                        | 1  |
| Performance Test Ratings Table.....                         | 1  |
| Summary of Major Factors Supporting Rating.....             | 1  |
| INSTITUTION .....                                           | 2  |
| Description of the Institution .....                        | 2  |
| Scope of the Evaluation .....                               | 5  |
| Conclusions with Respect to Performance Tests .....         | 7  |
| STATE OF MICHIGAN.....                                      | 12 |
| CRA Rating for Michigan:.....                               | 12 |
| Scope of the Evaluation .....                               | 12 |
| Description of the Institution's Operations .....           | 13 |
| Conclusions with Respect to Performance Tests .....         | 13 |
| Southeast Michigan Metropolitan Assessment Area.....        | 17 |
| Description of the Institution's Operations .....           | 17 |
| Conclusions with Respect to Performance Tests .....         | 22 |
| Ann Arbor MSA Assessment Area.....                          | 34 |
| Description of the Institution's Operations .....           | 34 |
| Conclusions with Respect to Performance Tests .....         | 37 |
| Metropolitan Assessment Areas (Limited-Scope Review) .....  | 47 |
| Description of the Institution's Operations .....           | 47 |
| Conclusions with Respect to Performance Tests .....         | 49 |
| Nonmetropolitan Area (Limited-Scope Review).....            | 50 |
| Description of Operations.....                              | 50 |
| Conclusions with Respect to Performance Tests .....         | 50 |
| STATE OF TEXAS.....                                         | 51 |
| CRA Rating for Texas:.....                                  | 51 |
| Scope of the Evaluation .....                               | 51 |
| Description of the Institution's Operations .....           | 52 |
| Conclusions with Respect to Performance Tests .....         | 52 |
| Dallas–Fort Worth Metropolitan Assessment Area .....        | 56 |
| Description of the Institution's Operations .....           | 56 |
| Conclusions with Respect to Performance Tests .....         | 61 |
| San Antonio Metropolitan Assessment Area .....              | 71 |
| Description of the Institution's Operations .....           | 71 |
| Conclusions with Respect to Performance Tests .....         | 74 |
| Metropolitan Assessment Areas (Limited-Scope Review) .....  | 84 |
| Description of the Institution's Operations .....           | 84 |
| Conclusions with Respect to Performance Tests .....         | 84 |
| Nonmetropolitan Assessment Area (Limited-Scope Review)..... | 85 |
| Description of Operations.....                              | 85 |
| Conclusions with Respect to Performance Tests .....         | 85 |

|                                                                       |     |
|-----------------------------------------------------------------------|-----|
| STATE OF CALIFORNIA .....                                             | 86  |
| CRA Rating for California: .....                                      | 86  |
| Scope of the Evaluation .....                                         | 86  |
| Description of the Institution's Operations .....                     | 87  |
| Conclusions with Respect to Performance Tests .....                   | 87  |
| Greater Los Angeles MSA Assessment Area .....                         | 91  |
| Description of the Institution's Operations .....                     | 91  |
| Conclusions with Respect to Performance Tests .....                   | 95  |
| Salinas MSA Assessment Area .....                                     | 107 |
| Description of the Institution's Operations .....                     | 107 |
| Conclusions with Respect to Performance Tests .....                   | 111 |
| San Jose Metropolitan Assessment Area .....                           | 120 |
| Description of the Institution's Operations .....                     | 120 |
| Conclusions with Respect to Performance Tests .....                   | 124 |
| Metropolitan Areas (Limited-Scope Review) .....                       | 135 |
| Description of the Institution's Operations .....                     | 135 |
| Conclusions with Respect to Performance Tests .....                   | 136 |
| STATE OF FLORIDA .....                                                | 137 |
| CRA Rating for Florida: .....                                         | 137 |
| Scope of the Evaluation .....                                         | 137 |
| Description of the Institution's Operations .....                     | 138 |
| Conclusions with Respect to Performance Tests .....                   | 138 |
| Fort Lauderdale – West Palm Beach Metropolitan Assessment Area .....  | 142 |
| Description of the Institution's Operations .....                     | 142 |
| Conclusions with Respect to Performance Tests .....                   | 146 |
| Metropolitan Assessment Area (Limited-Scope Review) .....             | 156 |
| Description of the Institution's Operations .....                     | 156 |
| Conclusions with Respect to Performance Tests .....                   | 156 |
| STATE OF ARIZONA .....                                                | 157 |
| CRA Rating for Arizona: .....                                         | 157 |
| Scope of the Evaluation .....                                         | 157 |
| Description of the Institution's Operations .....                     | 157 |
| Conclusions with Respect to Performance Tests .....                   | 158 |
| Phoenix Metropolitan Assessment Area .....                            | 159 |
| Description of the Institution's Operations .....                     | 159 |
| Conclusions with Respect to Performance Tests .....                   | 163 |
| APPENDICES .....                                                      | 175 |
| Appendix A: Full-Scope Assessment Areas Maps .....                    | 175 |
| Appendix B: Full-Scope Assessment Areas Demographic Information ..... | 184 |
| Appendix C: Full-Scope Assessment Areas Lending Tables .....          | 202 |
| Appendix D: Metropolitan Limited-Scope Assessment Areas .....         | 249 |
| Appendix E: Nonmetropolitan Limited-Scope Assessment Areas .....      | 457 |
| Glossary .....                                                        | 483 |



## INSTITUTION RATING

### OVERALL RATING

**Institution's Community Reinvestment Act Rating: Comerica Bank is rated Outstanding.**

The following table indicates the Community Reinvestment Act (CRA) performance level of Comerica Bank (Comerica or the bank) with respect to the lending, investment, and service tests.

### PERFORMANCE TEST RATINGS TABLE

| Performance Levels         | Comerica Bank Performance Tests |                 |              |
|----------------------------|---------------------------------|-----------------|--------------|
|                            | Lending Test*                   | Investment Test | Service Test |
| Outstanding                | X                               | X               |              |
| High Satisfactory          |                                 |                 | X            |
| Low Satisfactory           |                                 |                 |              |
| Needs to Improve           |                                 |                 |              |
| Substantial Non-Compliance |                                 |                 |              |

\* The Lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

### SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness and record of serving the credit needs of low-income individuals, very small businesses, and the assessment areas (AAs), including low-income areas.
- A substantial majority of loans are made in the bank's AAs.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI) individuals, and businesses of different revenue sizes is good.
- Comerica is a leader in making community development (CD) loans. Since the prior evaluation, the bank's CD lending increased by 181.5 percent by dollar amount despite the cessation of the Small Business Administration's (SBA's) Payroll Protection Program (PPP) in May 2021.
- The bank makes use of innovative and/or flexible lending practices in serving the AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. Since the prior evaluation, the bank's qualified CD investments increased by 23.3 percent.
- The bank exhibits good responsiveness to credit and CD needs as well as occasionally uses innovative and/or complex investments to support CD initiatives.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services, increasing the total hours by 47.1 percent since the prior evaluation.

## INSTITUTION

### DESCRIPTION OF THE INSTITUTION

Comerica is a financial institution headquartered in Dallas, Texas, which has the following characteristics:

- The bank is a wholly owned subsidiary of Comerica Incorporated, also headquartered in Dallas, Texas.
- As of June 30, 2023, the bank reported total assets of approximately \$90.9 billion and gross loans of \$55.5 billion.
- The bank operates 409 branches and 571 deposit-taking automated teller machines (ATMs) throughout the states of Arizona, California, Florida, Michigan, and Texas.
- Since the previous CRA performance evaluation, Comerica closed 26 branches and opened four branches within its AAs.
- The bank offers traditional deposit and loan products to meet the needs of the communities it serves.
  - Comerica is predominately a commercial lender, with commercial loans representing 78.9 percent of the bank's loan portfolio as of June 30, 2023.
  - Commercial loans are made for a variety of business purposes, including financing for interim construction of industrial and commercial properties; financing for equipment, inventories, and accounts receivable; and acquisition financing.
  - While residential real estate loans comprise a smaller portion of the total loan portfolio, at 6.9 percent, it is still considered significant.
  - During the COVID-19 pandemic, Comerica leveraged its knowledge and expertise of commercial lending to support and extend loans to small businesses within the bank's defined AAs.
- The bank's ability to meet various credit needs of the communities it serves has not been hampered by its capacity to lend, financial condition and size, product offerings, prior performance, legal impediments, or other factors.

Table 1 below reflects the bank's loan portfolio mix as of June 30, 2023.

| Table 1                                                        |               |              |
|----------------------------------------------------------------|---------------|--------------|
| Composition of Loan Portfolio as of June 30, 2023              |               |              |
| Loan Type                                                      | \$(000,000)   | Percent (%)  |
| Agricultural                                                   | 53            | 0.1          |
| Commercial                                                     | 43,731        | 78.9         |
| Consumer                                                       | 483           | 0.9          |
| Residential Real Estate                                        | 3,840         | 6.9          |
| Other                                                          | 7,349         | 13.3         |
| <b>Gross Loans</b>                                             | <b>55,456</b> | <b>100.0</b> |
| Note: Percentages may not total 100.0 percent due to rounding. |               |              |

The bank delineates 27 AAs among five states, as listed in Table 2A through 2E. The delineation of the AAs remained unchanged since January 1, 2020. Additional descriptions of the AAs can be found in the applicable AA sections of this report.

**Table 2A**

| <b>Michigan</b>                       |                                                                                                                                                                                    |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Assessment Area Name</b>           | <b>Assessment Area Description</b>                                                                                                                                                 |
| Ann Arbor, MI MSA AA                  | <ul style="list-style-type: none"> <li>• Washtenaw County</li> <li>• Entire MSA</li> </ul>                                                                                         |
| Battle Creek, MI MSA AA               | <ul style="list-style-type: none"> <li>• Calhoun County</li> <li>• Entire MSA</li> </ul>                                                                                           |
| Fenton, MI MSA AA                     | <ul style="list-style-type: none"> <li>• Genesee County</li> <li>• Entire MSA</li> </ul>                                                                                           |
| Grand Rapids-Kentwood Metropolitan AA | <ul style="list-style-type: none"> <li>• Ottawa and Kent counties</li> <li>• Grand Rapids-Kentwood, MI MSA, excluding Ionia and Montcalm counties</li> </ul>                       |
| Jackson, MI MSA AA                    | <ul style="list-style-type: none"> <li>• Jackson County</li> <li>• Entire MSA</li> </ul>                                                                                           |
| Kalamazoo-Portage, MI MSA AA          | <ul style="list-style-type: none"> <li>• Kalamazoo County</li> <li>• Entire MSA</li> </ul>                                                                                         |
| Lansing-East Lansing Metropolitan AA  | <ul style="list-style-type: none"> <li>• Eaton, Clinton, and Ingham counties – part of the Lansing-East Lansing MI, MSA, excluding Shiawassee County</li> </ul>                    |
| Midland, MI MSA AA                    | <ul style="list-style-type: none"> <li>• Midland County</li> <li>• Entire MSA</li> </ul>                                                                                           |
| Muskegon, MI MSA AA                   | <ul style="list-style-type: none"> <li>• Muskegon County</li> <li>• Entire MSA</li> </ul>                                                                                          |
| Southeast Michigan Metropolitan AA    | <ul style="list-style-type: none"> <li>• Livingston, Oakland, Macomb, Lapeer, and Wayne counties</li> <li>• Detroit-Warren-Dearborn, MI MSA, excluding St. Clair County</li> </ul> |
| Lenawee County Nonmetropolitan AA     | <ul style="list-style-type: none"> <li>• Lenawee County</li> </ul>                                                                                                                 |

**Table 2B**

| <b>Texas</b>                         |                                                                                                                                                                                                                                      |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Assessment Area Name</b>          | <b>Assessment Area Description</b>                                                                                                                                                                                                   |
| Austin Metropolitan AA               | <ul style="list-style-type: none"> <li>• Travis and Williamson counties – part of the Austin-Round Rock-Georgetown, TX MSA, excluding Bastrop, Caldwell, and Hays counties</li> </ul>                                                |
| Dallas-Fort Worth Metropolitan AA    | <ul style="list-style-type: none"> <li>• Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties – part of the Dallas-Fort Worth-Arlington, TX MSA, excluding Hunt, Kaufman, Johnson, Parker, and Wise counties</li> </ul>     |
| Houston Metropolitan AA              | <ul style="list-style-type: none"> <li>• Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties – part of the Houston-The Woodlands-Sugar Land, TX MSA, excluding Austin, Chambers, Liberty, and Waller counties</li> </ul> |
| San Antonio Metropolitan AA          | <ul style="list-style-type: none"> <li>• Bexar and Kendall counties – part of the San Antonio-New Braunfels, TX MSA, excluding Atascosa, Bandera, Comal, Guadalupe, Medina, and Wilson counties</li> </ul>                           |
| Bank of the Hills Nonmetropolitan AA | <ul style="list-style-type: none"> <li>• Kerr County</li> </ul>                                                                                                                                                                      |

**Table 2C**

**California**

| <b>Assessment Area Name</b>                                            | <b>Assessment Area Description</b>                                                                                                                                                         |
|------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Los Angeles-Long Beach-Anaheim, CA MSA AA (Greater Los Angeles MSA AA) | <ul style="list-style-type: none"> <li>• Los Angeles and Orange counties</li> <li>• Entire MSA</li> </ul>                                                                                  |
| Riverside-San Bernardino-Ontario, CA MSA AA (Inland Empire MSA AA)     | <ul style="list-style-type: none"> <li>• San Bernardino and Riverside counties</li> <li>• Entire MSA</li> </ul>                                                                            |
| Salinas, CA MSA AA                                                     | <ul style="list-style-type: none"> <li>• Monterey County</li> <li>• Entire MSA</li> </ul>                                                                                                  |
| San Diego-Chula Vista-Carlsbad, CA MSA (San Diego MSA AA)              | <ul style="list-style-type: none"> <li>• San Diego County</li> <li>• Entire MSA</li> </ul>                                                                                                 |
| San Francisco Bay Metropolitan AA                                      | <ul style="list-style-type: none"> <li>• Alameda, Contra Costa, San Francisco, and San Mateo counties</li> <li>• San Francisco-Oakland-Berkeley, CA MSA, excluding Marin County</li> </ul> |
| San Jose Metropolitan AA                                               | <ul style="list-style-type: none"> <li>• Santa Clara County</li> <li>• San Jose-Sunnyvale-Santa Clara, CA MSA, excluding San Benito County</li> </ul>                                      |
| Santa Cruz-Watsonville, CA MSA AA (Santa Cruz MSA AA)                  | <ul style="list-style-type: none"> <li>• Santa Cruz County</li> <li>• Entire MSA</li> </ul>                                                                                                |
| Oxnard-Thousand Oaks-Ventura, CA MSA AA (Ventura County MSA AA)        | <ul style="list-style-type: none"> <li>• Ventura County</li> <li>• Entire MSA</li> </ul>                                                                                                   |

**Table 2D**

**Florida**

| <b>Assessment Area Name</b>                     | <b>Assessment Area Description</b>                                                                                                                                      |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fort Lauderdale-West Palm Beach Metropolitan AA | <ul style="list-style-type: none"> <li>• Palm Beach and Broward counties</li> <li>• Miami-Fort Lauderdale-Pompano Beach, FL MSA, excluding Miami Dade County</li> </ul> |
| Naples-Marco Island, FL MSA AA (Naples MSA AA)  | <ul style="list-style-type: none"> <li>• Collier County</li> <li>• Entire MSA</li> </ul>                                                                                |

**Table 2E**

**Arizona**

| <b>Assessment Area Name</b> | <b>Assessment Area Description</b>                                                                                                                                   |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Phoenix Metropolitan AA     | <ul style="list-style-type: none"> <li>• Maricopa County</li> <li>• Phoenix-Mesa-Chandler, AZ Metropolitan Statistical Area (MSA), excluding Pinal County</li> </ul> |

The Federal Reserve Bank of Dallas rated the bank's CRA performance as Satisfactory at the previous performance evaluation dated February 8, 2021. The bank received a High Satisfactory rating under the Lending Test, a High Satisfactory rating under the Investment Test, and a High Satisfactory rating under the Service Test.

## SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AAs' demographic and economic characteristics, and credit needs.

This evaluation consists of a review of the bank's 2020, 2021 and 2022 HMDA and CRA-reported small business lending data, as well as the CD loans, investments, and services extended between January 1, 2021, and June 30, 2023, including prior period CD investments. Given that the bank's volume of small business lending exceeds that of HMDA lending, small business lending carried more weight when assessing Comerica's CRA performance. While the CRA-reported small farm lending data is displayed, it was not considered in assessing the bank's CRA performance given that agricultural lending represents less than 1 percent of Comerica's total loan portfolio. Moreover, small farm lending volume was insufficient in every AA; thus, a meaningful analysis could not be performed for this product. Lastly, HMDA-related lending activity classified as Multi-Family, Other Purpose Closed/Exempt and Loan Purpose Not Applicable was not evaluated separately due to negligible volume.

Full-scope reviews were conducted for nine of the bank's 27 delineated AAs. Factors to determine which AAs would receive full-scope reviews include, but are not limited to, the level of the bank's lending, investment, and service activities as well as the availability of opportunities in the AAs; comments received from community groups and the public regarding the institution's CRA performance; population density; the number of other institutions located in the AAs; and the length of time since the most recent full-scope review.

Table 3 depicts the scope of the review for each AA.

**Table 3**

| Full-Scope Review Assessment Areas                                                                                                     | Limited-Scope Review Assessment Areas                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Michigan</b>                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>Ann Arbor MSA AA</li> <li>Southeast Michigan Metropolitan AA</li> </ul>                         | <ul style="list-style-type: none"> <li>Battle Creek, MI MSA AA</li> <li>Flint, MI MSA AA</li> <li>Grand Rapids-Kentwood Metropolitan AA</li> <li>Jackson, MI MSA AA</li> <li>Kalamazoo-Portage MSA AA</li> <li>Lansing-East Lansing Metropolitan AA</li> <li>Midland, MI MSA AA</li> <li>Muskegon, MI MSA AA</li> <li>Lenawee County Nonmetropolitan AA</li> </ul> |
| <b>Texas</b>                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>Dallas-Fort Worth Metropolitan AA</li> <li>San Antonio Metropolitan AA</li> </ul>               | <ul style="list-style-type: none"> <li>Austin Metropolitan AA</li> <li>Houston Metropolitan AA</li> <li>Bank of the Hills Nonmetropolitan AA</li> </ul>                                                                                                                                                                                                            |
| <b>California</b>                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>Greater Los Angeles MSA AA</li> <li>Salinas MSA AA</li> <li>San Jose Metropolitan AA</li> </ul> | <ul style="list-style-type: none"> <li>Inland Empire MSA AA</li> <li>San Diego MSA AA</li> <li>San Francisco Bay Metropolitan AA</li> <li>Santa Cruz MSA AA</li> <li>Ventura County MSA AA</li> </ul>                                                                                                                                                              |
| <b>Florida</b>                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>Fort Lauderdale-West Palm Beach Metropolitan AA</li> </ul>                                      | <ul style="list-style-type: none"> <li>Naples MSA AA</li> </ul>                                                                                                                                                                                                                                                                                                    |
| <b>Arizona</b>                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>Phoenix Metropolitan AA</li> </ul>                                                              | None                                                                                                                                                                                                                                                                                                                                                               |

The evaluation of the bank's lending record in the individual AAs includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are 2011-2015 U.S. Census Bureau's American Community Survey (ACS) data, 2020 U.S. Census data as well as Dun & Bradstreet (D&B) data for 2020, 2021, and 2022. Demographic characteristics of a particular AA are useful in analyzing the bank's record of lending, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small businesses, examiners rely on D&B data, which consists of self-reported data of revenue size and geographical location by businesses entities. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers, as the information is used to understand the bank's performance context. Lastly, examiners interviewed community leaders serving the bank's AAs receiving a full-scope review to expand on the bank's performance context and understand the credit needs of such areas. Community contacts included representatives of community-based organizations, municipalities, and quasi-governmental agencies.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The bank's overall Lending Test rating is Outstanding. While the state ratings for Michigan and Texas are consistent with the overall rating, the state ratings for Arizona, California, and Florida are high satisfactory. Greater weight was given to Comerica's performance in the states of Michigan and Texas, as the bank's operations in these states represent 71.4 percent of total branches, 65.7 percent of total deposits, and 60.8 percent of the loans reviewed.

#### *Lending Activity*

The bank's overall lending levels reflect good responsiveness to credit needs of the bank's AAs, taking into consideration performance context such as the bank's resources and business strategy. In alignment with its business focus, Comerica extended more small business loans than HMDA and small farm loans during the review period. Generally, the bank's small business lending carried more weight when assessing the overall CRA performance. Table 4 summarizes the bank's lending activity from January 1, 2020 through December 31, 2022.

**Table 4**

| <b>Summary of Lending Activity</b>               |               |              |                   |              |
|--------------------------------------------------|---------------|--------------|-------------------|--------------|
| <b>January 1, 2020 through December 31, 2022</b> |               |              |                   |              |
| <b>Loan Type</b>                                 | <b>#</b>      | <b>%</b>     | <b>\$000s</b>     | <b>%</b>     |
| Home Purchase                                    | 1,616         | 2.9          | 697,604           | 5.1          |
| Refinancing                                      | 6,630         | 11.8         | 2,175,895         | 15.8         |
| Home Improvement                                 | 7,029         | 12.5         | 1,273,125         | 9.2          |
| Multifamily                                      | 94            | 0.2          | 1,425,857         | 10.3         |
| Other Purpose Lines of Credit                    | 4,576         | 8.2          | 934,316           | 6.8          |
| Other Purpose Closed/Exempt                      | 260           | 0.5          | 317,367           | 2.3          |
| <b>Total HMDA</b>                                | <b>20,205</b> | <b>36.1</b>  | <b>6,824,164</b>  | <b>49.5</b>  |
| <b>Total Small Business</b>                      | <b>35,231</b> | <b>62.8</b>  | <b>6,927,237</b>  | <b>50.2</b>  |
| <b>Total Small Farm</b>                          | <b>630</b>    | <b>1.1</b>   | <b>43,881</b>     | <b>0.3</b>   |
| <b>TOTAL LOANS</b>                               | <b>56,066</b> | <b>100.0</b> | <b>13,795,282</b> | <b>100.0</b> |

The bank makes use of flexible lending practices in its AAs, including the National Faith Home Buyers Program, the Micro Business Lending Program, and government-insured loan programs. Comerica's Micro Business Lending Program offers secured business lines of credit and term loans in smaller dollar amounts. This well-established program, which is offered throughout the bank's footprint, uses flexible lending practices to better serve the credit needs of small businesses. The bank also offers a variety of government-insured loan programs to help meet the credit needs of LMI borrowers and small businesses. During the review period, Comerica extended Veteran Administration (VA) and Federal Housing Administration (FHA) loan products in California, Michigan and Texas, as well as loans insured by the SBA throughout its AAs.

### **Assessment Area Concentration**

Comerica made a substantial majority of its loans in the delineated AAs. Table 5 displays the number volume and dollar amount of loans originated inside and outside of the bank's AAs.

**Table 5**

| <b>Lending Inside and Outside of the Assessment Areas</b> |                                |             |                   |             |                                 |            |                  |             |
|-----------------------------------------------------------|--------------------------------|-------------|-------------------|-------------|---------------------------------|------------|------------------|-------------|
| <b>Loan Type</b>                                          | <b>Inside Assessment Areas</b> |             |                   |             | <b>Outside Assessment Areas</b> |            |                  |             |
|                                                           | <b>#</b>                       | <b>%</b>    | <b>\$000s</b>     | <b>%</b>    | <b>#</b>                        | <b>%</b>   | <b>\$000s</b>    | <b>%</b>    |
| Home Purchase                                             | 1,408                          | 87.1        | 523,503           | 75.0        | 208                             | 12.9       | 174,101          | 25.0        |
| Refinancing                                               | 6,226                          | 93.9        | 1,911,183         | 87.8        | 404                             | 6.1        | 264,712          | 12.2        |
| Home Improvement                                          | 6,628                          | 94.3        | 1,199,820         | 94.2        | 401                             | 5.7        | 73,305           | 5.8         |
| Multifamily                                               | 67                             | 71.3        | 903,560           | 63.4        | 27                              | 28.7       | 522,297          | 36.6        |
| Other Purpose Lines of Credit                             | 4,332                          | 94.7        | 879,139           | 94.1        | 244                             | 5.3        | 55,177           | 5.9         |
| Other Purpose Closed/Exempt                               | 189                            | 72.7        | 213,804           | 67.4        | 71                              | 27.3       | 103,563          | 32.6        |
| <b>Total HMDA-Related</b>                                 | <b>18,850</b>                  | <b>93.3</b> | <b>5,631,009</b>  | <b>82.5</b> | <b>1,355</b>                    | <b>6.7</b> | <b>1,193,155</b> | <b>17.5</b> |
| <b>Small Business</b>                                     | <b>32,103</b>                  | <b>91.1</b> | <b>6,027,873</b>  | <b>87.0</b> | <b>3,128</b>                    | <b>8.9</b> | <b>899,364</b>   | <b>13.0</b> |
| <b>Small Farm</b>                                         | <b>572</b>                     | <b>90.8</b> | <b>35,535</b>     | <b>81.0</b> | <b>58</b>                       | <b>9.2</b> | <b>8,346</b>     | <b>19.0</b> |
| <b>TOTAL LOANS</b>                                        | <b>51,525</b>                  | <b>91.9</b> | <b>11,694,417</b> | <b>84.8</b> | <b>4,541</b>                    | <b>8.1</b> | <b>2,100,865</b> | <b>15.2</b> |

The remaining loan distribution analyses discussed in this performance evaluation consider only those loans originated within the bank's AAs. A detailed discussion of the facts and data supporting the overall conclusions for the geographic and borrower distribution and CD lending are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### **Geographic Distribution of Loans**

The overall geographic distribution of lending reflects excellent penetration throughout the bank's AAs.

### **Lending to Borrowers of Different Income Levels and Businesses of Different Sizes**

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different sizes.

### **Community Development Lending**

Comerica is a leader in making CD loans. The bank originated 1,348 CD loans during the evaluation period for a variety of purposes, as noted in Table 6. Since the previous evaluation, the number of CD loans extended by the bank increased by 38.3 percent despite the cessation of the SBA's PPP on May 31, 2021. Comerica responded by substantially increasing the dollar amount of its non-PPP CD lending (up almost 350 percent from the previous evaluation), which reflects very favorably on its responsiveness to the CD needs of its AAs. Moreover, the bank focused primarily on CD lending that fosters economic development, with an increase of more than 1,000 percent by number and dollar amount since the prior evaluation.



**Table 6**

| <b>Community Development Lending<br/>All Assessment Areas</b> |              |                  |
|---------------------------------------------------------------|--------------|------------------|
| <b>Purpose</b>                                                | <b>#</b>     | <b>\$(000s)</b>  |
| Affordable Housing                                            | 84           | 431,084          |
| Community Services                                            | 137          | 310,576          |
| Economic Development                                          | 870          | 4,192,974        |
| Revitalization and Stabilization                              | 257          | 401,877          |
| <b>Total</b>                                                  | <b>1,348</b> | <b>5,336,511</b> |

## INVESTMENT TEST

The bank's overall Investment Test rating is Outstanding. The state ratings for California, Michigan, and Texas are consistent with the overall rating. The state ratings for Arizona and Florida are high satisfactory.

Overall, Comerica is often in a leadership position given its excellent level of CD investments, grants, and donations. While the bank makes occasional use of innovative and/or complex investments, it exhibits good responsiveness to the credit and CD needs of its AAs. Consistent with prior performance evaluations, the bank's strategy focuses on selecting CD investments that are eligible for low-income housing tax credit (LIHTC), funding housing projects that meet certain rent affordability requirements in the bank's AAs. Additionally, the bank has a substantial volume of investments that foster economic development, noting an increase of 321.0 percent by number volume and 197.6 percent by dollar amount since the prior evaluation.

In addition to the CD investments, the bank's level of CD donations is particularly responsive to organizations that provide community services for LMI individuals and families. Comerica's philanthropic activities include donations to organizations that promote and support economic development. While the number of CD donations made by the bank decreased from the previous evaluation, Comerica's focus on targeted donations supporting small businesses increased by 400.0 percent by number volume and 1,728.6 percent by dollar amount.

Table 7 illustrates the bank's overall level of CD investments. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 7**

| <b>Investments, Grants, and Donations<br/>All Assessment Areas</b> |                                             |                 |                                        |                 |                  |                 |              |                 |
|--------------------------------------------------------------------|---------------------------------------------|-----------------|----------------------------------------|-----------------|------------------|-----------------|--------------|-----------------|
| <b>Community Development Purpose</b>                               | <b>Prior Period Investments<sup>1</sup></b> |                 | <b>Current Investments<sup>2</sup></b> |                 | <b>Donations</b> |                 | <b>Total</b> |                 |
|                                                                    | <b>#</b>                                    | <b>\$(000s)</b> | <b>#</b>                               | <b>\$(000s)</b> | <b>#</b>         | <b>\$(000s)</b> | <b>#</b>     | <b>\$(000s)</b> |
| Affordable Housing                                                 | 309                                         | 291,967         | 73                                     | 298,557         | 86               | 715             | 468          | 591,239         |
| Community Services                                                 | 0                                           | 0               | 0                                      | 0               | 161              | 3,534           | 161          | 3,534           |
| Economic Development                                               | 7                                           | 5,347           | 46                                     | 56,450          | 1,071            | 12,077          | 1,124        | 73,874          |
| Revitalization and Stabilization                                   | 0                                           | 0               | 0                                      | 0               | 20               | 128             | 20           | 128             |
| <b>Total</b>                                                       | <b>316</b>                                  | <b>297,314</b>  | <b>119</b>                             | <b>355,007</b>  | <b>1,338</b>     | <b>16,454</b>   | <b>1,773</b> | <b>668,775</b>  |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

**SERVICE TEST**

The bank's overall Service Test rating is High Satisfactory. The state ratings for Arizona, California, and Florida are consistent with the overall rating, while the state ratings for Michigan and Texas are outstanding.

**Retail Services**

Comerica's branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. The overall distribution of the bank's branch offices and full-service ATMs generally favor upper-income census tracts, though branches are distributed among geographies of all income levels throughout Comerica's AAs. The bank operates 409 branches and 571 full-service ATMs in its AAs, of which 101 branches or 24.7 percent are located in LMI census tracts. Moreover, the bank's record of opening and closing branches has not adversely affected the accessibility of Comerica's delivery systems, particularly in LMI areas or to LMI individuals. Since the previous evaluation, Comerica closed 26 branches. Twenty of the closed branches or 76.9 percent were located in middle- and upper-income census tracts, limiting impact to LMI geographies. Lastly, the bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours and drive-through services vary by branch location, with lobbies generally operating seven to nine hours on weekdays and offering extended drive-through hours daily. Additionally, Saturday drive-through hours are available at many bank locations.

Table 8 illustrates the distribution of banking offices and full-service ATMs by income level of geographies, as well as numbers of branch openings/closings during the evaluation period.

**Table 8**

| <b>Branch and Full-Service ATM Locations<br/>All Assessment Areas</b> |                      |                 |                            |                            |                 |              |                              |              |
|-----------------------------------------------------------------------|----------------------|-----------------|----------------------------|----------------------------|-----------------|--------------|------------------------------|--------------|
| <b>Tract Income</b>                                                   | <b>Census Tracts</b> |                 | <b>% of<br/>Households</b> | <b>% of<br/>Businesses</b> | <b>Branches</b> |              | <b>Full-Service<br/>ATMs</b> |              |
|                                                                       | <b>#</b>             | <b>%</b>        |                            |                            | <b>#</b>        | <b>%</b>     | <b>#</b>                     | <b>%</b>     |
| Low                                                                   | 1,140                | 7.8             | 6.7                        | 4.8                        | 21              | 5.1          | 34                           | 6.0          |
| Moderate                                                              | 3,754                | 25.6            | 24.7                       | 19.8                       | 80              | 19.6         | 111                          | 19.4         |
| Middle                                                                | 4,615                | 31.5            | 33.1                       | 30.7                       | 130             | 31.8         | 183                          | 32.0         |
| Upper                                                                 | 4,717                | 32.2            | 34.5                       | 42.8                       | 164             | 40.1         | 218                          | 38.2         |
| Unknown                                                               | 421                  | 2.9             | 1.1                        | 1.8                        | 14              | 3.4          | 25                           | 4.4          |
| <b>Total</b>                                                          | <b>14,647</b>        | <b>100.0</b>    | <b>100.0</b>               | <b>100.0</b>               | <b>409</b>      | <b>100.0</b> | <b>571</b>                   | <b>100.0</b> |
| <b>Changes in Branch Locations</b>                                    |                      |                 |                            |                            |                 |              |                              |              |
| <b>Tract Income</b>                                                   | <b>Low</b>           | <b>Moderate</b> | <b>Middle</b>              | <b>Upper</b>               | <b>Unknown</b>  | <b>Total</b> |                              |              |
| Openings (#)                                                          | 0                    | 0               | 1                          | 3                          | 0               | <b>4</b>     |                              |              |
| Closings (#)                                                          | 1                    | 3               | 9                          | 11                         | 2               | <b>26</b>    |                              |              |
| <b>Net Change</b>                                                     | <b>(1)</b>           | <b>(3)</b>      | <b>(8)</b>                 | <b>(8)</b>                 | <b>(2)</b>      | <b>(22)</b>  |                              |              |

**Community Development Services**

Overall, the bank provides a relatively high level of CD services throughout its AAs. The state ratings for California, Florida, and Texas are consistent with the overall rating, while the state ratings for Arizona and Michigan reflect an adequate level and an excellent level of CD services,

respectively. Additionally, the volume of qualified CD services provided by the bank has grown substantially since the previous evaluation.

Bank representatives provided 7,002 services totaling 22,340 hours to 877 organizations, with a significant portion of services provided to local grassroots and well-known organizations that provide varying levels of community services to LMI individuals and families in the bank's AAs. This level of CD services represents an increase of 119.4 percent in services and 47.1 percent in hours since Comerica's previous evaluation. The increase is attributable to the bank's commitment to CRA through various initiatives, such as designating paid time-off for employees to volunteer and requiring senior officers to incorporate qualified volunteer hours in their annual performance plans. Two noteworthy initiatives are:

- Comerica Financial Education Brigade consists of approximately 1,000 employees who volunteer virtually or in person to help meet the identified need for financial education throughout the AAs' diverse communities.
- Comerica BusinessHQ, a collaborative space established in the Dallas-Fort Worth Metropolitan AA in early 2023, has the express mission of serving small businesses in the severely underserved South Dallas region. This proof-of-concept location, at an estimated cost of \$5 million, has served more than 400 individuals by providing approximately \$4,500 worth of no-cost coworking space and tailored technical assistance by bank employees. In response to the overwhelming success of Comerica BusinessHQ and the development of new avenues to serve the area created through the program, Comerica plans to extend the concept to other AAs. This commitment to community service, despite it not fitting within established definitions of qualified CD activity, reflects very favorably on the bank's responsiveness and creativity to meet the needs of its AAs.

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of federal consumer financial laws. The Federal Reserve System retains authority to enforce compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Federal Reserve Bank of Dallas did not cite violations involving illegal discrimination or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this evaluation, the Federal Reserve Bank of Dallas is unaware of any violations of the Equal Credit Opportunity Act or Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

## STATE OF MICHIGAN

|                                 |                    |
|---------------------------------|--------------------|
| <b>CRA RATING FOR MICHIGAN:</b> | <b>Outstanding</b> |
| The Lending Test is Rated:      | Outstanding        |
| The Investment Test is Rated:   | Outstanding        |
| The Service Test is Rated:      | Outstanding        |

Major factors supporting the institution's rating include:

- Lending activity reflects excellent responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels and businesses of different revenue sizes is good.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors.
- The bank makes occasional use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.
- Delivery systems are readily accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services that do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica is a leader in providing CD services.

### SCOPE OF THE EVALUATION

The scope of the review for the state of Michigan is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Two of the 11 AAs in the state of Michigan were reviewed using full-scope procedures.

- Southeast Michigan Metropolitan AA
- Ann Arbor MSA AA

The remaining nine AAs received limited-scope reviews.

- Battle Creek, MI MSA AA
- Flint, MI MSA AA
- Grand Rapids-Kentwood Metropolitan AA
- Jackson, MI MSA AA
- Kalamazoo-Portage MSA AA
- Lansing-East Lansing Metropolitan AA
- Midland, MI MSA AA
- Muskegon, MI MSA AA
- Lenawee County Nonmetropolitan AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA last received a full-scope review. Approximately 81.4 percent of lending activity (by number of loans), 92.3 percent of the deposits, and 76.3 percent of branches within the state of Michigan were evaluated through the full-scope reviews. The bank's performance in the Southeast Michigan Metropolitan AA was given greater consideration as it is Comerica's largest AA in any state, representing more than 30 percent of total branches and more than 40 percent of total deposits.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MICHIGAN**

The bank delineates 11 of its 27 AAs and operates 177 of its 409 branches in the state of Michigan. As of June 30, 2022, Comerica had \$37.7 billion in deposits in the state, representing 49.1 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 12.0 percent and ranked 3<sup>rd</sup> out of 103 FDIC-insured financial institutions across the state.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in Michigan is Outstanding. The Lending Test conclusions in the Southeast Michigan Metropolitan AA is considered excellent, which is consistent with the overall state rating, while the Lending Test conclusion in the Ann Arbor MSA AA is good. Overall, the bank's performance in its AAs receiving limited-scope reviews support the bank's state rating.

### **Lending Activity**

Comerica's lending activities in the state of Michigan reflect excellent responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including 33 FHA/VA loans, 9,734 SBA loans, and 2,001 small business micro loans in the state of Michigan.

As outlined in Table 9, this evaluation considered 21,917 loans totaling \$3.9 billion. The loan products and origination volumes appear consistent with the credit needs of the bank's Michigan AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period. Comerica ranked 12<sup>th</sup> out of 229 CRA reporters and 27<sup>th</sup> of 807 HMDA reporters in its Michigan AAs.

**Table 9**

| <b>Summary of Lending Activity – January 1, 2020 through December 31, 2022<br/>Michigan Assessment Areas</b> |               |              |                  |              |
|--------------------------------------------------------------------------------------------------------------|---------------|--------------|------------------|--------------|
| <b>Loan Type</b>                                                                                             | <b>#</b>      | <b>%</b>     | <b>\$000s</b>    | <b>%</b>     |
| Home Purchase                                                                                                | 655           | 3.0          | 142,159          | 3.7          |
| Refinancing                                                                                                  | 2,617         | 11.9         | 488,002          | 12.5         |
| Home Improvement                                                                                             | 1,591         | 7.3          | 164,860          | 4.2          |
| Multifamily                                                                                                  | 20            | 0.1          | 89,044           | 2.3          |
| Other Purpose Lines of Credit                                                                                | 1,186         | 5.4          | 154,192          | 4.0          |
| Other Purpose Closed-End/Exempt                                                                              | 76            | 0.3          | 29,356           | 0.8          |
| <b>Total HMDA-Related</b>                                                                                    | <b>6,145</b>  | <b>28.0</b>  | <b>1,067,613</b> | <b>27.5</b>  |
| <b>Total Small Business</b>                                                                                  | <b>15,515</b> | <b>70.8</b>  | <b>2,806,724</b> | <b>72.2</b>  |
| <b>Total Small Farm</b>                                                                                      | <b>257</b>    | <b>1.2</b>   | <b>14,498</b>    | <b>0.4</b>   |
| <b>TOTAL LOANS</b>                                                                                           | <b>21,917</b> | <b>100.0</b> | <b>3,888,835</b> | <b>100.0</b> |

### ***Geographic Distribution of Loans***

The overall geographic distribution of lending reflects excellent penetration throughout the bank's Michigan AAs. This performance is consistent across Comerica's Southeast Michigan Metropolitan AA, while the geographic distribution of lending in the Ann Arbor MSA AA is adequate.

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different revenue sizes. This performance is consistent across the bank's Southeast Michigan Metropolitan and Ann Arbor MSA AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### ***Community Development Lending***

Comerica is a leader in making CD loans in the state of Michigan. As reflected in Table 10, the bank originated 612 CD loans totaling approximately \$2.2 billion within the state, which comprises 45.4 percent of overall bank-wide CD loan volume by number and 41.7 percent by dollar amount. The level of CD lending is excellent in the Southeast Michigan Metropolitan and Ann Arbor MSA AAs.

The number of CD loans originated by the bank in the state of Michigan decreased slightly from the review period of the previous evaluation; however, this is attributed to the cessation of the SBA's PPP, in which the bank was heavily involved, making up 37.9 percent of the bank's qualified CD loans at the previous evaluation. Despite the decrease in the number of qualified originations in the state, the dollar amount of qualified originations increased substantially, growing by approximately 103.4 percent.

CD loans originated by the bank during the evaluation period were extended for a variety of purposes, as noted in Table 10. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 10**

| <b>Community Development Lending<br/>Michigan Assessment Areas</b> |            |                  |
|--------------------------------------------------------------------|------------|------------------|
| <b>Purpose</b>                                                     | <b>#</b>   | <b>\$(000s)</b>  |
| Affordable Housing                                                 | 17         | 123,340          |
| Community Services                                                 | 72         | 160,921          |
| Economic Development                                               | 421        | 1,780,763        |
| Revitalization and Stabilization                                   | 102        | 161,765          |
| <b>Total</b>                                                       | <b>612</b> | <b>2,226,789</b> |

## INVESTMENT TEST

Comerica's performance under the Investment Test in the state of Michigan is Outstanding. The Investment Test conclusions in the bank's Southeast Michigan AA is excellent, which is consistent with the overall state rating. In the bank's Ann Arbor MSA AA, the bank's performance is good. Generally, the bank's performance in its AAs that received limited-scope reviews is consistent with the overall performance in the state of Michigan.

Comerica is often in a leadership position, as it has an excellent level of qualified CD investments and grants. The bank exhibits good responsiveness to the credit and CD needs of its AAs while occasionally using innovative and/or complex investments. Since the previous evaluation, the bank has increased the dollar amount of investments by 30.1 percent or \$54.1 million. As illustrated in Table 11, the bank made a significant number of investments in affordable housing initiatives within the AA, which was identified as a CD need by a community contact. Many of these investments were comprised of LIHTC funds to assist with building affordable housing, reflecting favorably on the bank's responsiveness in meeting AA CD needs. Additionally, the level of the bank's CD investments and donations are particularly responsive to area organizations that support community services for LMI individuals, with Comerica extending 502 donations for a total of \$4.4 million.

Details regarding investments and donations in each of the bank's Michigan AAs can be found in the Conclusions with Respect to Performance Tests section for each AA. In addition to the volume of qualified CD investments and donations within the bank's delineated AAs, Comerica made five additional qualified CD investments in the broader statewide area. These investments include a \$5 million investment in a large rent-restricted affordable housing project as well as multiple deposits in minority- and women-owned financial institutions.

**Table 11**

| <b>Investments, Grants, and Donations<br/>Michigan Assessment Areas</b> |                                                 |                 |                                            |                 |                  |                 |              |                 |
|-------------------------------------------------------------------------|-------------------------------------------------|-----------------|--------------------------------------------|-----------------|------------------|-----------------|--------------|-----------------|
| <b>Community Development<br/>Purpose</b>                                | <b>Prior Period<br/>Investments<sup>1</sup></b> |                 | <b>Current<br/>Investments<sup>2</sup></b> |                 | <b>Donations</b> |                 | <b>Total</b> |                 |
|                                                                         | <b>#</b>                                        | <b>\$(000s)</b> | <b>#</b>                                   | <b>\$(000s)</b> | <b>#</b>         | <b>\$(000s)</b> | <b>#</b>     | <b>\$(000s)</b> |
| Affordable Housing                                                      | 85                                              | 99,991          | 29                                         | 122,633         | 39               | 203             | 153          | 222,827         |
| Community Services                                                      | 0                                               | 0               | 0                                          | 0               | 502              | 4,347           | 502          | 4,347           |
| Economic Development                                                    | 2                                               | 1,153           | 8                                          | 9,747           | 38               | 937             | 48           | 11,837          |
| Revitalization and Stabilization                                        | 0                                               | 0               | 0                                          | 0               | 15               | 92              | 15           | 92              |
| <b>Total</b>                                                            | <b>87</b>                                       | <b>101,144</b>  | <b>37</b>                                  | <b>132,380</b>  | <b>594</b>       | <b>5,579</b>    | <b>718</b>   | <b>239,103</b>  |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

**SERVICE TEST**

Comerica's performance under the Service Test in the state of Michigan is Outstanding. The Service Test conclusions in the Southeast Michigan Metropolitan and Ann Arbor MSA AAs are excellent and good, respectively. Generally, the bank's performance in the AAs that received limited-scope reviews is consistent with the performance in the full-scope review areas and the state of Michigan. A notable example of the bank's CD services is its Financial Education Brigade, which consists of approximately 1,000 employees who volunteer virtually or in person to provide financial education throughout the AAs' diverse communities.

**Retail Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in each AA. Of Comerica's 177 full-service offices and 277 full-serve ATMs in the state of Michigan, 45 branches and 80 ATMs are located in LMI tracts. During the review period, the bank closed 14 branches, three of which were in moderate-income census tracts, and opened two branches, one of which is in a low-income census tract. The branches closed in LMI tracts were in geographies that are reasonably served by other branches. In the state of Michigan, Comerica's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Table 12 depicts the distribution of the Michigan banking offices and full-service ATMs by income level of geographies.

**Table 12**

| <b>Branch and Full-Service ATM Locations<br/>Michigan Assessment Areas</b> |                             |                            |                            |                 |              |                          |              |
|----------------------------------------------------------------------------|-----------------------------|----------------------------|----------------------------|-----------------|--------------|--------------------------|--------------|
| <b>Tract<br/>Income</b>                                                    | <b>% of<br/>Geographies</b> | <b>% of<br/>Households</b> | <b>% of<br/>Businesses</b> | <b>Branches</b> |              | <b>Full-Service ATMs</b> |              |
|                                                                            |                             |                            |                            | <b>#</b>        | <b>%</b>     | <b>#</b>                 | <b>%</b>     |
| Low                                                                        | 8.7                         | 7.1                        | 5.9                        | 9               | 5.1          | 18                       | 6.5          |
| Moderate                                                                   | 23.6                        | 22.8                       | 20.3                       | 36              | 20.3         | 62                       | 22.3         |
| Middle                                                                     | 33.9                        | 37.5                       | 35.5                       | 61              | 34.5         | 88                       | 31.8         |
| Upper                                                                      | 28.2                        | 31.4                       | 36.1                       | 64              | 36.2         | 90                       | 32.5         |
| Unknown                                                                    | 5.6                         | 1.2                        | 2.2                        | 7               | 4.0          | 19                       | 6.9          |
| <b>Total</b>                                                               | <b>100.0</b>                | <b>100.0</b>               | <b>100.0</b>               | <b>177</b>      | <b>100.0</b> | <b>277</b>               | <b>100.0</b> |

The bank's products, services, and business hours do not vary in a way that inconveniences LMI geographies and/or individuals in the AAs. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Services section of this evaluation.

**Community Development Services**

Comerica is a leader in providing CD services in its Michigan AAs. While this conclusion is consistent with the bank's Southeast Michigan Metropolitan AA, Comerica provides a relatively high level of CD services in its Ann Arbor MSA AA. Bank representatives provided 3,481 CD services, totaling 11,235 hours, to 429 unique organizations within the state of Michigan. This represents approximately 49.7 percent of the bank's total CD services. Details regarding CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.



**SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA**

- The bank's Southeast Michigan Metropolitan AA consists of Livingston, Oakland, Macomb, Lapeer, and Wayne counties in Michigan. These counties represent part of the Detroit-Warren-Dearborn, MI MSA, with St. Clair County excluded from the AA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 1,305 census tracts, of which 9.3 percent are designated as low-income, 25.6 percent are moderate-income, 29.3 percent are middle-income, 29.4 percent are upper-income, and 6.4 percent are designated as unknown-income.
- Following the 2020 U.S. Census, 54 new census tracts were drawn within the AA, representing a 4.3 percent increase in the AA geographies. Census tracts designated as LMI decreased by 6.6 percent.
- The bank operates 126 full-service branches in the AA, including eight branches in low-income, 23 in moderate-income, 37 in middle-income, 52 in upper-income, and six in unknown-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 17.3 percent market share, ranking 2<sup>nd</sup> out of 37 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 20<sup>th</sup> out of 683 HMDA reporters in the AA with 1,462 HMDA originations and purchases, and 12<sup>th</sup> out of 198 CRA reporters with 1,908 CRA small business loans.
- Community contacts indicated a shortage of affordable housing, a need for small business loans given the conclusion of the SBA's PPP, and job creation and retention. Additionally, community contacts indicated a need for activities that promote revitalization and stabilization and support for small businesses, as the AA is still recovering from significant population decline experienced in the 1970s.

**Table 13**

| <b>Population Change</b>                                                                                                                                                                                              |                        |                        |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------------|--------------------------|
| <b>Assessment Area: Southeast Michigan Metropolitan</b>                                                                                                                                                               |                        |                        |                          |
| <b>Area</b>                                                                                                                                                                                                           | <b>2015 Population</b> | <b>2020 Population</b> | <b>Percentage Change</b> |
| Southeast Michigan Metropolitan AA                                                                                                                                                                                    | 4,135,987              | 4,231,658              | 2.3                      |
| Lapeer County, MI                                                                                                                                                                                                     | 88,235                 | 88,619                 | 0.4                      |
| Livingston County, MI                                                                                                                                                                                                 | 184,591                | 193,866                | 5.0                      |
| Macomb County, MI                                                                                                                                                                                                     | 854,689                | 881,217                | 3.1                      |
| Oakland County, MI                                                                                                                                                                                                    | 1,229,503              | 1,274,395              | 3.7                      |
| Wayne County, MI                                                                                                                                                                                                      | 1,778,969              | 1,793,561              | 0.8                      |
| Detroit-Dearborn-Livonia, MI MD*                                                                                                                                                                                      | 1,778,969              | 1,793,561              | 0.8                      |
| Warren-Troy-Farmington Hills, MI MD                                                                                                                                                                                   | 2,517,447              | 2,598,480              | 3.2                      |
| Michigan                                                                                                                                                                                                              | 9,900,571              | 10,077,331             | 1.8                      |
| Source: 2020 U.S. Census Bureau Decennial Census<br>2011-2015 U.S. Census Bureau: American Community Survey<br>* The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI. |                        |                        |                          |

- The AA population moderately grew from 2015 to 2020, primarily driven by the growth experienced in Livingston, Macomb, and Oakland counties. The AA population growth is similar the statewide growth rate. A community contacted noted growth in the Macomb area as a result of the revitalization of the automobile manufacturing industry in recent years.
- The Detroit-Warren-Dearborn, MI MSA represents a significant portion of the statewide population, making it the 14<sup>th</sup> largest MSA in the United States as identified by the 2020 U.S. Census.
- A community contact noted that the AA is still recovering from historical population decline from major automobile plants closing in the 1970s. The downtown area is undergoing a revitalization process that attracts young adults to the area. However, families who can afford to move to the suburbs, move given the poor quality of urban neighborhoods.

**Table 14**

| <b>Median Family Income Change</b>                                                                                         |                                  |                                  |                          |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|--------------------------|
| <b>Assessment Area: Southeast Michigan Metropolitan</b>                                                                    |                                  |                                  |                          |
| <b>Area</b>                                                                                                                | <b>2015 Median Family Income</b> | <b>2020 Median Family Income</b> | <b>Percentage Change</b> |
| Southeast Michigan Metropolitan AA                                                                                         | 73,531                           | 81,067                           | 10.2                     |
| Lapeer County, MI                                                                                                          | 67,575                           | 74,675                           | 10.5                     |
| Livingston County, MI                                                                                                      | 93,625                           | 100,663                          | 7.5                      |
| Macomb County, MI                                                                                                          | 74,060                           | 80,371                           | 8.5                      |
| Oakland County, MI                                                                                                         | 95,290                           | 106,060                          | 11.3                     |
| Wayne County, MI                                                                                                           | 57,615                           | 63,896                           | 10.9                     |
| Detroit-Dearborn-Livonia, MI MD*                                                                                           | 57,615                           | 63,896                           | 10.9                     |
| Warren-Troy-Farmington Hills, MI MD                                                                                        | 83,843                           | 92,419                           | 10.2                     |
| Michigan                                                                                                                   | 68,010                           | 75,470                           | 11.0                     |
| Source: 2011-2015 U.S. Census Bureau: American Community Survey<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |                                  |                          |
| Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.                                |                                  |                                  |                          |
| * The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.                     |                                  |                                  |                          |

- The AA MFI grew at a comparable rate to that of the state of Michigan. The AA growth is mostly driven by the population growth experienced in Oakland and Wayne counties.
- According to FFIEC Census Data, 13.3 percent of households in the AA lived below the poverty level.
- A community contact noted an increase in the cost of living within the AA, such as groceries, daycare, and car insurance, yet wages have not been able to keep pace.

**Table 15**

| <b>Housing Cost Burden</b>                              |                              |                        |                    |                             |                        |                   |
|---------------------------------------------------------|------------------------------|------------------------|--------------------|-----------------------------|------------------------|-------------------|
| <b>Assessment Area: Southeast Michigan Metropolitan</b> |                              |                        |                    |                             |                        |                   |
| <b>Area</b>                                             | <b>Cost Burden – Renters</b> |                        |                    | <b>Cost Burden - Owners</b> |                        |                   |
|                                                         | <b>Low Income</b>            | <b>Moderate Income</b> | <b>All Renters</b> | <b>Low Income</b>           | <b>Moderate Income</b> | <b>All Owners</b> |
| Southeast Michigan Metropolitan AA                      | 75.2                         | 35.1                   | 44.2               | 62.6                        | 28.0                   | 19.4              |
| Lapeer County, MI                                       | 69.8                         | 20.3                   | 44.0               | 62.0                        | 24.9                   | 18.6              |
| Livingston County, MI                                   | 72.7                         | 19.5                   | 38.5               | 61.3                        | 28.1                   | 17.6              |
| Macomb County, MI                                       | 80.3                         | 36.2                   | 43.6               | 64.1                        | 29.1                   | 18.9              |
| Oakland County, MI                                      | 77.6                         | 45.4                   | 38.9               | 70.0                        | 36.5                   | 18.1              |
| Wayne County, MI                                        | 73.2                         | 29.8                   | 47.7               | 58.9                        | 23.0                   | 21.1              |
| Detroit-Dearborn-Livonia, MI MD*                        | 73.2                         | 29.8                   | 47.7               | 58.9                        | 23.0                   | 21.1              |
| Warren-Troy-Farmington Hills, MI MD                     | 77.7                         | 38.9                   | 40.8               | 65.8                        | 31.0                   | 18.4              |
| Michigan                                                | 74.2                         | 31.3                   | 43.2               | 61.7                        | 26.5                   | 18.2              |

*Cost burden is housing cost that equals 30 percent or more of household income.*  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy  
\* The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level. A community contact stated that families living under the poverty level in the AA cannot afford reasonably priced housing. Additionally, the community contact noted that many landlords delay housing repairs due to cost, which contributes to blight.
- Overall, the cost burden for homeowners and renters in the AA is greater than the housing cost burden for homeowners and renters statewide.
- With a median housing age of 60 years, the AA housing stock is aging. Community contacts indicated that much of the AA is comprised of blighted or abandoned housing. Additionally, a community contact identified the Highland Park neighborhood, a suburb within the Detroit area, as particularly comprised of abandoned and aging housing stock.
- The AA median housing value is \$180,383, which exceeds the state's median housing value, at \$162,600.
- A community contact also noted that there is a shortage of affordable rental properties.

**Table 16**

| <b>Unemployment Rates</b>                               |             |             |             |             |             |
|---------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Assessment Area: Southeast Michigan Metropolitan</b> |             |             |             |             |             |
| <b>Region</b>                                           | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| Southeast Michigan Metropolitan AA                      | 4.3         | 4.2         | 11.5        | 6.2         | 3.9         |
| Lapeer County, MI                                       | 5.2         | 5.3         | 12.2        | 6.1         | 4.1         |
| Livingston County, MI                                   | 3.3         | 3.2         | 8.6         | 4.2         | 2.9         |
| Macomb County, MI                                       | 4.1         | 4.2         | 11.8        | 5.9         | 3.7         |
| Oakland County, MI                                      | 3.4         | 3.4         | 9.1         | 4.7         | 3.0         |
| Wayne County, MI                                        | 5.2         | 5.0         | 13.5        | 8.0         | 4.6         |
| Detroit-Dearborn-Livonia, MI MD*                        | 5.2         | 5.0         | 13.5        | 8.0         | 4.6         |
| Warren-Troy-Farmington Hills, MI MD                     | 3.7         | 3.8         | 10.2        | 5.2         | 3.3         |
| Michigan                                                | 4.2         | 4.1         | 10.0        | 5.9         | 4.2         |

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*  
\* The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.

- Unemployment rates in the AA are comparable to the statewide rates between 2018 and 2022.
- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include manufacturing, healthcare and social services, retail trade, and professional and technical services.
- The AA employment industry is primarily dominated by the domestic automobile sector, as it is the home of Ford Motor Company, General Motors Company, and Fiat Chrysler Automobiles (collectively the “Big Three.”)

Table 17 details selected characteristics of the AA.

**Table 17**

| 2022 Combined Demographics                                                                                                                                                               |                           |                       |                                    |       |                                           |           |                           |           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-------|-------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Southeast Michigan Metropolitan                                                                                                                                         |                           |                       |                                    |       |                                           |           |                           |           |
| Income Categories                                                                                                                                                                        | Tract Distribution        |                       | Families by Tract Income           |       | Families < Poverty Level as % of Families |           | Families by Family Income |           |
|                                                                                                                                                                                          | #                         | %                     | #                                  | %     | #                                         | %         | #                         | %         |
| Low                                                                                                                                                                                      | 121                       | 9.3                   | 66,823                             | 6.4   | 24,062                                    | 36.0      | 224,058                   | 21.6      |
| Moderate                                                                                                                                                                                 | 334                       | 25.6                  | 244,745                            | 23.5  | 40,114                                    | 16.4      | 176,534                   | 17.0      |
| Middle                                                                                                                                                                                   | 382                       | 29.3                  | 341,826                            | 32.9  | 23,825                                    | 7.0       | 206,769                   | 19.9      |
| Upper                                                                                                                                                                                    | 384                       | 29.4                  | 380,227                            | 36.6  | 12,019                                    | 3.2       | 432,326                   | 41.6      |
| Unknown                                                                                                                                                                                  | 84                        | 6.4                   | 6,066                              | 0.6   | 2,470                                     | 40.7      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                 | 1,305                     | 100.0                 | 1,039,687                          | 100.0 | 102,490                                   | 9.9       | 1,039,687                 | 100.0     |
|                                                                                                                                                                                          | Housing Units by Tract    | Housing Type by Tract |                                    |       |                                           |           |                           |           |
|                                                                                                                                                                                          |                           | Owner-occupied        |                                    |       | Rental                                    |           | Vacant                    |           |
|                                                                                                                                                                                          |                           | #                     | % by                               | % by  | #                                         | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                      | 166,190                   | 49,868                | 4.3                                | 30.0  | 80,494                                    | 48.4      | 35,828                    | 21.6      |
| Moderate                                                                                                                                                                                 | 489,835                   | 245,791               | 21.4                               | 50.2  | 176,244                                   | 36.0      | 67,800                    | 13.8      |
| Middle                                                                                                                                                                                   | 581,341                   | 392,450               | 34.2                               | 67.5  | 151,152                                   | 26.0      | 37,739                    | 6.5       |
| Upper                                                                                                                                                                                    | 579,941                   | 453,744               | 39.6                               | 78.2  | 95,993                                    | 16.6      | 30,204                    | 5.2       |
| Unknown                                                                                                                                                                                  | 21,262                    | 5,399                 | 0.5                                | 25.4  | 9,598                                     | 45.1      | 6,265                     | 29.5      |
| Total AA                                                                                                                                                                                 | 1,838,569                 | 1,147,252             | 100.0                              | 62.4  | 513,481                                   | 27.9      | 177,836                   | 9.7       |
|                                                                                                                                                                                          | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |       |                                           |           |                           |           |
|                                                                                                                                                                                          |                           |                       | Less Than or = \$1 Million         |       | Over \$1 Million                          |           | Revenue Not Reported      |           |
|                                                                                                                                                                                          |                           |                       | #                                  | %     | #                                         | %         | #                         | %         |
| Low                                                                                                                                                                                      | 13,299                    | 6.6                   | 11,881                             | 6.4   | 1,332                                     | 8.3       | 86                        | 5.4       |
| Moderate                                                                                                                                                                                 | 44,166                    | 21.8                  | 40,401                             | 21.8  | 3,459                                     | 21.5      | 306                       | 19.3      |
| Middle                                                                                                                                                                                   | 62,368                    | 30.8                  | 57,429                             | 31.0  | 4,470                                     | 27.8      | 469                       | 29.6      |
| Upper                                                                                                                                                                                    | 78,252                    | 38.6                  | 71,782                             | 38.8  | 5,795                                     | 36.1      | 675                       | 42.6      |
| Unknown                                                                                                                                                                                  | 4,611                     | 2.3                   | 3,562                              | 1.9   | 1,000                                     | 6.2       | 49                        | 3.1       |
| Total AA                                                                                                                                                                                 | 202,696                   | 100.0                 | 185,055                            | 100.0 | 16,056                                    | 100.0     | 1,585                     | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                          |                           |                       |                                    | 91.3  |                                           | 7.9       |                           | 0.8       |
|                                                                                                                                                                                          | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |       |                                           |           |                           |           |
|                                                                                                                                                                                          |                           |                       | Less Than or = \$1 Million         |       | Over \$1 Million                          |           | Revenue Not Reported      |           |
|                                                                                                                                                                                          |                           |                       | #                                  | %     | #                                         | %         | #                         | %         |
| Low                                                                                                                                                                                      | 39                        | 3.3                   | 38                                 | 3.3   | 1                                         | 3.2       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                 | 222                       | 18.7                  | 218                                | 18.8  | 4                                         | 12.9      | 0                         | 0.0       |
| Middle                                                                                                                                                                                   | 514                       | 43.3                  | 501                                | 43.3  | 13                                        | 41.9      | 0                         | 0.0       |
| Upper                                                                                                                                                                                    | 403                       | 33.9                  | 391                                | 33.8  | 12                                        | 38.7      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                  | 10                        | 0.8                   | 9                                  | 0.8   | 1                                         | 3.2       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                 | 1,188                     | 100.0                 | 1,157                              | 100.0 | 31                                        | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                               |                           |                       |                                    | 97.4  |                                           | 2.6       |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding |                           |                       |                                    |       |                                           |           |                           |           |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the Southeast Michigan Metropolitan AA is excellent. Comerica's retail lending performance was bolstered by the bank's substantial efforts to meet AA needs through CD lending. For this evaluation, small business lending generally carried more weight, as it comprised the largest volume of lending in the AA. Additionally, multifamily, other purpose closed/exempt, and loan purpose not applicable lending were not separately reviewed in the evaluation of the bank's home mortgage lending.

Details of Comerica's 2020 mortgage and small business lending as well as aggregate data can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the Southeast Michigan Metropolitan AA reflects excellent responsiveness to AA credit needs. Comerica makes extensive use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs, including FHA, VA, and SBA loans. During the review period, the bank extended 7,993 SBA loans and 1,657 small business micro loans in the AA and actively partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. The bank's level of lending to these programs demonstrates Comerica's excellent record of serving the credit needs of low-income individuals and very small businesses.

Comerica extended 4,455 home mortgage and 12,169 small business loans between January 1, 2020, and December 31, 2022. The loan products and origination volumes are responsive to the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

### ***Geographic Distribution of Loans***

The geographic distribution of small business and home mortgage lending, including both originations and purchases, was compared with available demographic and aggregate lending data. The bank's geographic distribution of loans reflects excellent penetration throughout the AA. There were no significant gaps or lapses in contiguous geographies noted.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage loans in the AA is good. The distribution of 2021 and 2022 home mortgage loans among low-income census tracts is comparable to aggregate data and the demographic figure. Among moderate-income census tracts, the bank's performance is below the demographic figure, but comparable to aggregate lending. Aggregate lending serves as a better proxy for loan demand than the demographic figure when evaluating the bank's geographic distribution of HMDA lending.

The bank's 2020 lending performance reflected penetration levels similar to those of 2021 and 2022, with a distribution of loans to LMI tracts that was comparable to aggregate data but below the demographic figure.

### *Home Purchase Lending*

The geographic distribution of home purchase lending in the AA is excellent. Among low-income census tracts, the bank's 2021 home purchase lending performance level is slightly below aggregate data, as well as below the demographic figure. In 2022, Comerica's performance in low-income geographies is above aggregate data and comparable to the demographic figure.

Comerica's 2021 and 2022 distribution of home purchase loans among moderate-income tracts is notably above aggregate lending and exceeds the percentage of owner-occupied units. The number of home purchase loans originated by the bank within LMI census tracts almost doubled from 2020 to 2021 (with 23 and 41 originations, respectively) and remained elevated in 2022, with 42 loans, which reflects favorably on the bank's responsiveness to credit needs of these geographies. During the same period, the percentage of owner-occupied housing units located in LMI census tracts grew by only 0.2 percent (growing from 25.5 percent in 2020 to 25.7 percent in 2021). This is particularly noteworthy as a community contact the difficulty homebuyers face when securing financing options, often leveraging predatory lending options or entering into land contracts at much higher interest rates.

The bank's lending performance for 2020 reflects penetration levels below those of 2021 and 2022, with a distribution of loans to LMI tracts that is below aggregate data and the demographic figure. This further validates the improvement in the bank's overall performance despite rising interest rates.

### *Home Refinance Lending*

The geographic distribution of home refinance lending is good. The distribution of 2021 home refinance loans among low-income census tracts is above aggregate data and comparable to the demographic figure. The distribution of 2022 home refinance lending reflects comparable performance to both figures.

The penetration level of the bank's 2022 home refinance lending among moderate-income census tracts is below the aggregate data and the demographic figure, while the bank performed slightly above aggregate data in 2021.

The bank's 2020 lending performance reflects penetration levels consistent with 2021 and 2022, with a distribution of loans to LMI tracts that is comparable to aggregate data but below the demographic figure. A community contact emphasized the significant role refinance loans played in meeting the needs of the community. The bank's lending performance of home refinances in the AA is responsive as these loans predominantly helped LMI in the AA.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is good. The distribution of 2021 and 2022 home improvement loans among LMI census tracts is comparable to the level of aggregate data but below the demographic figure. The bank's performance improved between 2021 and 2022 among moderate-income census tracts, though it declined by a similar margin among low-income tracts.

The bank's lending performance in 2020 reflected penetration levels consistent with 2021 and 2022 with a distribution of loans to LMI tracts that is slightly above aggregate data but below the demographic figure.

*Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is good. The bank's 2021 performance reflects a distribution among LMI census tracts that is comparable to the aggregate data but below the percentage of owner occupied. While the bank's 2022 performance in low-income geographies declined slightly, it remained comparable to aggregate lending. Notably, among moderate-income census tracts, Comerica's 2022 other purpose lines of credit lending increased from the 2021 level, outperforming aggregate data, but remaining below the demographic figure.

The bank's 2020 lending performance is consistent with the 2021 and 2022 levels, with a distribution of loans to LMI tracts that is slightly above aggregate data but below the demographic figure.

Tables 18A and 18B provide details about the bank's 2021 and 2022 home mortgage lending by income level of geography within the AA.



**Table 18A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Southeast Michigan Metropolitan |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
|--------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|-------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                        | Bank and Aggregate Loans by Year |       |       |         |       |       |       |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                      | 2021                             |       |       |         |       |       | 2022  |       |       |         |       |       |                              |
|                                                                                                                                      | Bank                             |       | Agg   | Bank    |       | Agg   | Bank  |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                      | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #     | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                                                                                  |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Low                                                                                                                                  | 2                                | 1.4   | 3.8   | 306     | 0.9   | 2.1   | 6     | 4.5   | 3.5   | 974     | 2.9   | 1.8   | 4.3                          |
| Moderate                                                                                                                             | 39                               | 26.7  | 17.6  | 7,297   | 21.9  | 11.4  | 36    | 26.9  | 20.6  | 6,133   | 18.5  | 13.6  | 21.4                         |
| Middle                                                                                                                               | 52                               | 35.6  | 38.3  | 9,475   | 28.4  | 34.3  | 46    | 34.3  | 36.4  | 8,720   | 26.3  | 31.9  | 34.2                         |
| Upper                                                                                                                                | 53                               | 36.3  | 40.2  | 16,234  | 48.7  | 52.2  | 46    | 34.3  | 39.2  | 17,391  | 52.4  | 52.6  | 39.6                         |
| Unknown                                                                                                                              | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0     | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 0.5                          |
| Total                                                                                                                                | 146                              | 100.0 | 100.0 | 33,312  | 100.0 | 100.0 | 134   | 100.0 | 100.0 | 33,218  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                      |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Low                                                                                                                                  | 29                               | 4.2   | 1.6   | 2,043   | 1.6   | 0.8   | 12    | 2.4   | 2.3   | 2,126   | 2.1   | 1.3   | 4.3                          |
| Moderate                                                                                                                             | 103                              | 14.8  | 11.9  | 10,163  | 7.7   | 8.0   | 69    | 13.7  | 17.9  | 7,126   | 7.1   | 12.6  | 21.4                         |
| Middle                                                                                                                               | 230                              | 33.0  | 37.4  | 35,165  | 26.7  | 32.0  | 166   | 33.0  | 37.4  | 26,001  | 26.0  | 33.2  | 34.2                         |
| Upper                                                                                                                                | 335                              | 48.1  | 49.2  | 84,151  | 64.0  | 59.2  | 253   | 50.3  | 42.2  | 64,592  | 64.6  | 52.8  | 39.6                         |
| Unknown                                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 3     | 0.6   | 0.2   | 168     | 0.2   | 0.2   | 0.5                          |
| Total                                                                                                                                | 697                              | 100.0 | 100.0 | 131,522 | 100.0 | 100.0 | 503   | 100.0 | 100.0 | 100,013 | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                               |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Low                                                                                                                                  | 17                               | 4.0   | 2.4   | 661     | 1.5   | 1.4   | 9     | 2.0   | 2.3   | 452     | 0.9   | 1.3   | 4.3                          |
| Moderate                                                                                                                             | 50                               | 11.8  | 11.6  | 2,585   | 5.9   | 8.1   | 73    | 16.0  | 14.3  | 5,693   | 10.9  | 10.1  | 21.4                         |
| Middle                                                                                                                               | 129                              | 30.4  | 35.8  | 10,377  | 23.8  | 31.7  | 141   | 30.9  | 34.2  | 14,102  | 27.0  | 29.5  | 34.2                         |
| Upper                                                                                                                                | 227                              | 53.4  | 50.1  | 29,872  | 68.6  | 58.7  | 232   | 50.8  | 49.1  | 31,938  | 61.1  | 58.9  | 39.6                         |
| Unknown                                                                                                                              | 2                                | 0.5   | 0.1   | 32      | 0.1   | 0.0   | 2     | 0.4   | 0.2   | 90      | 0.2   | 0.1   | 0.5                          |
| Total                                                                                                                                | 425                              | 100.0 | 100.0 | 43,527  | 100.0 | 100.0 | 457   | 100.0 | 100.0 | 52,275  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                    |                                  |       |       |         |       |       |       |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                  | 0                                | 0.0   | 12.7  | 0       | 0.0   | 4.4   | 2     | 25.0  | 11.4  | 1,219   | 4.0   | 8.8   |                              |
| Moderate                                                                                                                             | 0                                | 0.0   | 34.3  | 0       | 0.0   | 16.7  | 0     | 0.0   | 37.1  | 0       | 0.0   | 32.1  |                              |
| Middle                                                                                                                               | 0                                | 0.0   | 32.1  | 0       | 0.0   | 49.1  | 2     | 25.0  | 30.1  | 28,858  | 93.9  | 18.4  |                              |
| Upper                                                                                                                                | 0                                | 0.0   | 20.9  | 0       | 0.0   | 29.8  | 4     | 50.0  | 18.0  | 665     | 2.2   | 38.9  |                              |
| Unknown                                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0     | 0.0   | 3.3   | 0       | 0.0   | 1.8   |                              |
| Total                                                                                                                                | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 8     | 100.0 | 100.0 | 30,742  | 100.0 | 100.0 |                              |
| Total Home Mortgage Loans                                                                                                            |                                  |       |       |         |       |       |       |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                  | 58                               | 3.6   | 2.4   | 3,681   | 1.4   | 1.4   | 34    | 2.3   | 2.9   | 5,010   | 1.9   | 2.1   |                              |
| Moderate                                                                                                                             | 227                              | 14.2  | 13.8  | 22,429  | 8.6   | 9.6   | 243   | 16.6  | 18.8  | 24,718  | 9.3   | 14.4  |                              |
| Middle                                                                                                                               | 512                              | 32.0  | 37.6  | 67,084  | 25.6  | 33.5  | 482   | 33.0  | 36.4  | 90,936  | 34.2  | 31.0  |                              |
| Upper                                                                                                                                | 801                              | 50.0  | 46.2  | 168,329 | 64.3  | 55.4  | 698   | 47.7  | 41.7  | 145,211 | 54.6  | 52.1  |                              |
| Unknown                                                                                                                              | 3                                | 0.2   | 0.0   | 80      | 0.0   | 0.0   | 5     | 0.3   | 0.3   | 258     | 0.1   | 0.3   |                              |
| Total                                                                                                                                | 1,601                            | 100.0 | 100.0 | 261,603 | 100.0 | 100.0 | 1,462 | 100.0 | 100.0 | 266,133 | 100.0 | 100.0 |                              |
| Source: 2022 FFIEC Census Data                                                                                                       |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                              |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                       |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |

**Table 18B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Southeast Michigan Metropolitan                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 8                                | 2.6   | 2.1   | 530     | 1.3   | 1.1   | 4    | 1.2   | 1.4   | 189     | 0.5   | 0.8   | 4.3                          |
| Moderate                                                                                                                                                    | 31                               | 10.0  | 9.9   | 2,081   | 5.0   | 6.3   | 55   | 16.6  | 12.9  | 4,411   | 10.5  | 8.1   | 21.4                         |
| Middle                                                                                                                                                      | 94                               | 30.3  | 34.8  | 10,518  | 25.2  | 28.6  | 118  | 35.5  | 34.1  | 12,397  | 29.5  | 29.6  | 34.2                         |
| Upper                                                                                                                                                       | 176                              | 56.8  | 53.2  | 28,516  | 68.4  | 64.0  | 155  | 46.7  | 51.4  | 24,968  | 59.5  | 61.5  | 39.6                         |
| Unknown                                                                                                                                                     | 1                                | 0.3   | 0.1   | 48      | 0.1   | 0.0   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.5                          |
| Total                                                                                                                                                       | 310                              | 100.0 | 100.0 | 41,693  | 100.0 | 100.0 | 332  | 100.0 | 100.0 | 41,965  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 2                                | 8.7   | 3.7   | 141     | 1.2   | 1.7   | 1    | 3.6   | 3.3   | 50      | 0.6   | 2.8   | 4.3                          |
| Moderate                                                                                                                                                    | 4                                | 17.4  | 16.8  | 303     | 2.6   | 8.5   | 10   | 35.7  | 20.6  | 1,355   | 17.1  | 12.4  | 21.4                         |
| Middle                                                                                                                                                      | 7                                | 30.4  | 36.9  | 1,549   | 13.4  | 27.1  | 9    | 32.1  | 34.8  | 858     | 10.8  | 25.8  | 34.2                         |
| Upper                                                                                                                                                       | 10                               | 43.5  | 42.5  | 9,556   | 82.7  | 62.7  | 8    | 28.6  | 41.0  | 5,657   | 71.4  | 58.6  | 39.6                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.4   | 0.5                          |
| Total                                                                                                                                                       | 23                               | 100.0 | 100.0 | 11,549  | 100.0 | 100.0 | 28   | 100.0 | 100.0 | 7,920   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 3.8   | 0       | 0.0   | 2.2   | 0    | 0.0   | 5.7   | 0       | 0.0   | 6.6   | 4.3                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 21.3  | 0       | 0.0   | 15.8  | 0    | 0.0   | 21.2  | 0       | 0.0   | 18.4  | 21.4                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 44.0  | 0       | 0.0   | 42.6  | 0    | 0.0   | 46.8  | 0       | 0.0   | 41.5  | 34.2                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 30.9  | 0       | 0.0   | 39.3  | 0    | 0.0   | 26.1  | 0       | 0.0   | 33.5  | 39.6                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.5                          |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### Small Business Lending

Comerica's geographic distribution of small business loans reflects excellent penetration throughout the AA. As noted on Table 19, the bank's small business lending among LMI census tracts in 2021 exceeds aggregate data and the percentage of businesses located in such geographies. In 2022, the bank's performance remains above aggregate data but comparable to the demographic figure.

The bank's lending performance among low-income census tracts is above aggregate data in 2022 but comparable in 2021. Comerica's lending performance among moderate-income census tracts in 2022 is comparable to aggregate data but slightly above in 2021.

The bank's 2020 distribution of small business loans among LMI census tracts exceeds aggregate data while comparable to the demographic figure. A community contact noted the need for small business loans within the AA to help small businesses retain and create jobs. Another contact identified a need for lending to small businesses to recover from the 2008 recession and the COVID-19 pandemic. The bank has sustained performance levels despite the rising interest rates, economic environment, and the SBA's PPP conclusion.

**Table 19**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Southeast Michigan Metropolitan                                                     |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|-------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income Level                                                                                                                                                                | Bank and Aggregate Loans by Year |       |       |         |       |       |       |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022  |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank  |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | %     | %     | \$(000) | %     | %     | #     | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 394                              | 10.2  | 7.5   | 75,334  | 11.1  | 7.9   | 179   | 9.4   | 5.7   | 52,475  | 10.4  | 6.6   | 6.6                      |
| Moderate                                                                                                                                                                                  | 916                              | 23.6  | 20.4  | 172,636 | 25.4  | 20.9  | 414   | 21.7  | 20.3  | 111,161 | 22.1  | 19.8  | 21.8                     |
| Middle                                                                                                                                                                                    | 981                              | 25.3  | 30.5  | 165,875 | 24.4  | 28.0  | 510   | 26.7  | 30.8  | 124,656 | 24.7  | 29.3  | 30.8                     |
| Upper                                                                                                                                                                                     | 1,535                            | 39.6  | 40.8  | 250,995 | 36.9  | 42.2  | 707   | 37.1  | 40.9  | 180,606 | 35.8  | 40.5  | 38.6                     |
| Unknown                                                                                                                                                                                   | 53                               | 1.4   | 0.5   | 15,707  | 2.3   | 0.9   | 98    | 5.1   | 2.0   | 34,984  | 6.9   | 3.7   | 2.3                      |
| Total                                                                                                                                                                                     | 3,879                            | 100.0 | 100.0 | 680,547 | 100.0 | 100.0 | 1,908 | 100.0 | 100.0 | 503,882 | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic data and the performance of aggregate HMDA lenders. As shown on Tables 20A and 20B, the dispersion of home mortgage loans among low-income borrowers exceeds the 2021 and 2022 aggregate data but is below the percentage of AA families classified as low-income. It is often more difficult for low-income borrowers to qualify for mortgages, especially in a rising interest rate environment, as noted in 2022. Despite the increase in mortgage costs, the bank outperformed aggregate lending in 2022 by a larger margin than it did in 2021, reflecting very favorably on its willingness to extend credit to low-income borrowers. Additionally, the bank's performance among moderate-income borrowers exceeds than the demographic figure and is comparable to aggregate data.

The bank's performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that exceeds aggregate data.

**Table 20A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Southeast Michigan Metropolitan |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
|----------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|-------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                      | Bank and Aggregate Loans by Year |       |       |         |       |       |       |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                  | 2021                             |       |       |         |       |       | 2022  |       |       |         |       |       |                                   |
|                                                                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank  |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                  | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #     | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                                              |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                              | 16                               | 11.0  | 11.3  | 2,366   | 7.1   | 6.1   | 17    | 12.7  | 11.0  | 1,808   | 5.4   | 5.6   | 21.6                              |
| Moderate                                                                                                                         | 33                               | 22.6  | 23.0  | 5,791   | 17.4  | 16.8  | 44    | 32.8  | 23.4  | 7,984   | 24.0  | 16.6  | 17.0                              |
| Middle                                                                                                                           | 27                               | 18.5  | 22.8  | 6,679   | 20.0  | 21.6  | 22    | 16.4  | 22.5  | 4,893   | 14.7  | 21.2  | 19.9                              |
| Upper                                                                                                                            | 49                               | 33.6  | 30.1  | 13,677  | 41.1  | 42.9  | 34    | 25.4  | 28.9  | 14,804  | 44.6  | 41.9  | 41.6                              |
| Unknown                                                                                                                          | 21                               | 14.4  | 12.8  | 4,799   | 14.4  | 12.5  | 17    | 12.7  | 14.1  | 3,729   | 11.2  | 14.8  | 0.0                               |
| Total                                                                                                                            | 146                              | 100.0 | 100.0 | 33,312  | 100.0 | 100.0 | 134   | 100.0 | 100.0 | 33,218  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                  |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                              | 104                              | 14.9  | 8.5   | 8,793   | 6.7   | 4.7   | 105   | 20.9  | 14.1  | 9,906   | 9.9   | 8.6   | 21.6                              |
| Moderate                                                                                                                         | 139                              | 19.9  | 18.5  | 16,061  | 12.2  | 13.3  | 129   | 25.6  | 24.0  | 14,857  | 14.9  | 19.0  | 17.0                              |
| Middle                                                                                                                           | 118                              | 16.9  | 23.6  | 17,053  | 13.0  | 21.0  | 83    | 16.5  | 23.8  | 14,472  | 14.5  | 22.4  | 19.9                              |
| Upper                                                                                                                            | 266                              | 38.2  | 37.0  | 76,721  | 58.3  | 48.2  | 160   | 31.8  | 28.8  | 48,559  | 48.6  | 39.6  | 41.6                              |
| Unknown                                                                                                                          | 70                               | 10.0  | 12.5  | 12,894  | 9.8   | 12.7  | 26    | 5.2   | 9.3   | 12,219  | 12.2  | 10.3  | 0.0                               |
| Total                                                                                                                            | 697                              | 100.0 | 100.0 | 131,522 | 100.0 | 100.0 | 503   | 100.0 | 100.0 | 100,013 | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                           |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                              | 57                               | 13.4  | 8.2   | 2,882   | 6.6   | 5.9   | 62    | 13.6  | 9.3   | 3,676   | 7.0   | 6.0   | 21.6                              |
| Moderate                                                                                                                         | 84                               | 19.8  | 16.7  | 5,282   | 12.1  | 12.9  | 85    | 18.6  | 18.9  | 7,030   | 13.4  | 13.8  | 17.0                              |
| Middle                                                                                                                           | 94                               | 22.1  | 24.3  | 8,540   | 19.6  | 20.4  | 117   | 25.6  | 25.6  | 12,077  | 23.1  | 21.7  | 19.9                              |
| Upper                                                                                                                            | 174                              | 40.9  | 49.0  | 25,478  | 58.5  | 58.9  | 165   | 36.1  | 44.5  | 27,440  | 52.5  | 56.8  | 41.6                              |
| Unknown                                                                                                                          | 16                               | 3.8   | 1.8   | 1,345   | 3.1   | 1.9   | 28    | 6.1   | 1.7   | 2,052   | 3.9   | 1.7   | 0.0                               |
| Total                                                                                                                            | 425                              | 100.0 | 100.0 | 43,527  | 100.0 | 100.0 | 457   | 100.0 | 100.0 | 52,275  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                        |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                              | 221                              | 13.8  | 9.3   | 16,796  | 6.4   | 5.3   | 239   | 16.4  | 11.7  | 18,650  | 7.9   | 6.5   | 21.6                              |
| Moderate                                                                                                                         | 299                              | 18.7  | 19.7  | 30,838  | 11.8  | 14.5  | 318   | 21.9  | 22.7  | 34,948  | 14.8  | 17.0  | 17.0                              |
| Middle                                                                                                                           | 310                              | 19.4  | 23.2  | 40,077  | 15.3  | 21.1  | 296   | 20.4  | 23.3  | 38,357  | 16.3  | 21.4  | 19.9                              |
| Upper                                                                                                                            | 655                              | 40.9  | 35.3  | 153,671 | 58.7  | 46.5  | 509   | 35.0  | 31.3  | 123,871 | 52.6  | 42.3  | 41.6                              |
| Unknown                                                                                                                          | 116                              | 7.2   | 12.4  | 20,221  | 7.7   | 12.6  | 92    | 6.3   | 11.1  | 19,565  | 8.3   | 12.9  | 0.0                               |
| Total                                                                                                                            | 1,601                            | 100.0 | 100.0 | 261,603 | 100.0 | 100.0 | 1,454 | 100.0 | 100.0 | 235,391 | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                                   |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                          |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                   |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                        |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |

**Table 20B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Southeast Michigan Metropolitan                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 38                               | 12.3  | 8.3   | 2,214   | 5.3   | 5.6   | 51   | 15.4  | 9.1   | 3,027   | 7.2   | 5.6   | 21.6                              |
| Moderate                                                                                                                                                    | 41                               | 13.2  | 14.8  | 3,497   | 8.4   | 10.4  | 53   | 16.0  | 19.1  | 4,280   | 10.2  | 13.8  | 17.0                              |
| Middle                                                                                                                                                      | 69                               | 22.3  | 21.3  | 7,275   | 17.4  | 17.2  | 70   | 21.1  | 24.7  | 6,635   | 15.8  | 19.8  | 19.9                              |
| Upper                                                                                                                                                       | 155                              | 50.0  | 53.2  | 28,060  | 67.3  | 64.8  | 137  | 41.3  | 44.6  | 26,458  | 63.0  | 58.7  | 41.6                              |
| Unknown                                                                                                                                                     | 7                                | 2.3   | 2.4   | 647     | 1.6   | 2.0   | 21   | 6.3   | 2.5   | 1,565   | 3.7   | 2.1   | 0.0                               |
| Total                                                                                                                                                       | 310                              | 100.0 | 100.0 | 41,693  | 100.0 | 100.0 | 332  | 100.0 | 100.0 | 41,965  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 6                                | 26.1  | 12.6  | 541     | 4.7   | 6.2   | 4    | 14.3  | 12.4  | 233     | 2.9   | 7.2   | 21.6                              |
| Moderate                                                                                                                                                    | 2                                | 8.7   | 19.2  | 207     | 1.8   | 12.8  | 7    | 25.0  | 21.2  | 797     | 10.1  | 14.1  | 17.0                              |
| Middle                                                                                                                                                      | 2                                | 8.7   | 22.0  | 530     | 4.6   | 15.7  | 4    | 14.3  | 25.4  | 280     | 3.5   | 17.8  | 19.9                              |
| Upper                                                                                                                                                       | 11                               | 47.8  | 41.2  | 9,735   | 84.3  | 59.5  | 13   | 46.4  | 35.3  | 6,610   | 83.5  | 51.2  | 41.6                              |
| Unknown                                                                                                                                                     | 2                                | 8.7   | 4.9   | 536     | 4.6   | 5.8   | 0    | 0.0   | 5.8   | 0       | 0.0   | 9.7   | 0.0                               |
| Total                                                                                                                                                       | 23                               | 100.0 | 100.0 | 11,549  | 100.0 | 100.0 | 28   | 100.0 | 100.0 | 7,920   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.9   | 21.6                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 17.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.8   | 19.9                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 41.6                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 99.1  | 0       | 0.0   | 99.5  | 0    | 0.0   | 97.6  | 0       | 0.0   | 97.6  | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's borrower distribution of small business lending by revenue size of businesses is adequate despite the sharp reduction in volume and steady decline in performance when compared to the aggregate lenders' performance year after year. Table 21 shows the distribution of 2022 small business loans to businesses with revenues of \$1 million or less is below aggregate data and well below the percentage of small businesses in the AA. The bank's distribution of loans to small businesses in 2021 exceeds the 2022 performance and is slightly below to aggregate data. This is reasonable as Comerica made significantly more small business loans in 2021 than in 2022, and aggregate data serves as a better proxy for loan demand than the demographic figure.

The bank's 2020 small business lending to businesses with revenues of \$1 million or less exceeds the 2021 and 2022 performance, with a distribution of loans to small businesses greater than the aggregate data.

**Table 21**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|-------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Southeast Michigan Metropolitan                                   |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |       |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022  |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank  |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | %     | #     | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 1,633                            | 42.1  | 46.1  | 150,849 | 22.2  | 26.4  | 666   | 34.9  | 50.9  | 111,547 | 22.1  | 31.4  | 91.3                     |
| Over \$1 Million                                                                   | 1,297                            | 33.4  |       | 420,131 | 61.7  |       | 1,010 | 52.9  |       | 341,998 | 67.9  |       | 7.9                      |
| Revenue Unknown                                                                    | 949                              | 24.5  |       | 109,567 | 16.1  |       | 232   | 12.2  |       | 50,337  | 10.0  |       | 0.8                      |
| Total                                                                              | 3,879                            | 100.0 |       | 680,547 | 100.0 |       | 1,908 | 100.0 |       | 503,882 | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 2,316                            | 59.7  | 91.8  | 95,179  | 14.0  | 35.0  | 818   | 42.9  | 95.2  | 49,493  | 9.8   | 41.9  |                          |
| \$100,001 - \$250,000                                                              | 749                              | 19.3  | 4.7   | 134,653 | 19.8  | 19.1  | 443   | 23.2  | 2.5   | 86,215  | 17.1  | 14.3  |                          |
| \$250,001 - \$1 Million                                                            | 814                              | 21.0  | 3.5   | 450,715 | 66.2  | 45.8  | 647   | 33.9  | 2.3   | 368,174 | 73.1  | 43.7  |                          |
| Total                                                                              | 3,879                            | 100.0 | 100.0 | 680,547 | 100.0 | 100.0 | 1,908 | 100.0 | 100.0 | 503,882 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 1,258                            | 77.0  |       | 49,094  | 32.5  |       | 398   | 59.8  |       | 24,278  | 21.8  |       |                          |
| \$100,001 - \$250,000                                                              | 251                              | 15.4  |       | 42,696  | 28.3  |       | 153   | 23.0  |       | 27,953  | 25.1  |       |                          |
| \$250,001 - \$1 Million                                                            | 124                              | 7.6   |       | 59,059  | 39.2  |       | 115   | 17.3  |       | 59,316  | 53.2  |       |                          |
| Total                                                                              | 1,633                            | 100.0 |       | 150,849 | 100.0 |       | 666   | 100.0 |       | 111,547 | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |       |       |       |         |       |       |                          |

## Community Development Lending

The bank is a leader in making CD loans in the AA. Comerica originated 402 qualified CD loans totaling \$1.5 billion in the AA, which represents 29.8 percent of the bank's total CD loan volume and 27.6 percent of the total dollar amount of CD loan originations. The dollar amount of the bank's CD lending activity in the AA grew by 70.1 percent since the previous evaluation, even as the number volume dropped by 21.0 percent. Comerica made a concerted effort to increase CD lending to fill the void left by the cessation of the SBA's PPP in May 2021, with a specific focus on promoting economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Loans for this purpose comprised the largest portion of the bank's qualified CD lending during the review period. Examples of Comerica's CD lending activities that were considered responsive to the credit needs of the AA include:

- A \$13.5 million loan to support the business operations of a metal stamping small business located in Detroit, Michigan. The loan allows the business to continue operating in the AA, employing skilled trade workers, who are mostly LMI individuals living in the LMI geographies.
- A \$7 million construction loan, in conjunction with an \$8 million CD investment, for a 30-unit housing project that includes 11 subsidized units set expressly aside to provide housing and wrap-around services for chronically homeless individuals in the AA.
- A \$36 million line of credit to an organization providing tuition-free education for children in the AA, of which 63 percent qualify for free or reduced-price lunch.

Table 22 summarizes the CD loans extended in the AA during the review period.

**Table 22**

| <b>Community Development Lending<br/>Assessment Area: Southeast Michigan Metropolitan</b> |            |                  |
|-------------------------------------------------------------------------------------------|------------|------------------|
| <b>Purpose</b>                                                                            | <b>#</b>   | <b>\$000s</b>    |
| Affordable Housing                                                                        | 11         | 89,890           |
| Community Services                                                                        | 37         | 51,771           |
| Economic Development                                                                      | 273        | 1,193,942        |
| Revitalization and Stabilization                                                          | 81         | 137,813          |
| <b>Total</b>                                                                              | <b>402</b> | <b>1,473,416</b> |

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is excellent. Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The dollar amount of CD investments and grants made in the AA grew by 48.6 percent since the previous evaluation. Though Comerica makes occasional use of innovative and/or complex investments, it exhibits good responsiveness to credit and CD needs of the AA.

Table 23 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on Comerica's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. Examples of CD investment and donation activities include:

- An \$8 million LIHTC equity investment, in conjunction with a \$7 million CD loan, for a 30-unit new housing construction project that includes 11 subsidized units set expressly aside for chronically homeless individuals in the AA. The project also includes a provision of wrap-around services including mental health services, employment training, and financial literacy education. This investment is particularly responsive given the shortage of affordable housing, as indicated by community contacts.
- A \$250,000 deposit with a minority-owned depository institution to support the institution with a mentor-protégé relationship focused on capacity building and developing community engagement opportunities for the bank.
- A \$100,000 donation to an organization providing assistance to technology startups and local businesses through entrepreneurship training, business-focused financial education, and networking events. This donation demonstrates the bank's commitment to serving the credit needs of the AA, as a community contact noted that AA small businesses require support and investments to help revitalize the AA.

**Table 23**

| Investment, Grants, and Donations<br>Assessment Area: Southeast Michigan Metropolitan |                                       |               |                                  |                |            |              |            |                |
|---------------------------------------------------------------------------------------|---------------------------------------|---------------|----------------------------------|----------------|------------|--------------|------------|----------------|
| Community Development Purpose                                                         | Prior Period Investments <sup>1</sup> |               | Current Investments <sup>2</sup> |                | Donations  |              | Total      |                |
|                                                                                       | #                                     | \$(000s)      | #                                | \$(000s)       | #          | \$(000s)     | #          | \$(000s)       |
| Affordable Housing                                                                    | 42                                    | 63,342        | 19                               | 98,625         | 9          | 77           | 70         | 162,044        |
| Community Services                                                                    | 0                                     | 0             | 0                                | 0              | 362        | 3,761        | 362        | 3,761          |
| Economic Development                                                                  | 1                                     | 443           | 2                                | 5,205          | 26         | 815          | 29         | 6,463          |
| Revitalization and Stabilization                                                      | 0                                     | 0             | 0                                | 0              | 10         | 81           | 10         | 81             |
| <b>Total</b>                                                                          | <b>43</b>                             | <b>63,785</b> | <b>21</b>                        | <b>103,830</b> | <b>407</b> | <b>4,734</b> | <b>471</b> | <b>172,349</b> |
| <sup>1</sup> Book value of investment                                                 |                                       |               |                                  |                |            |              |            |                |
| <sup>2</sup> Original market value of investment                                      |                                       |               |                                  |                |            |              |            |                |

## SERVICE TEST

The bank's Service Test performance is excellent.

### Retail Services

Comerica's delivery systems are readily accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's 126 branch offices and 213 ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the tract categories within the AA. Table 24 summarizes the bank's retail locations in the AA.

**Table 24**

| Branch and Full-Service ATM Locations<br>Assessment Area: Southeast Michigan Metropolitan |                  |                 |                 |            |              |                   |              |
|-------------------------------------------------------------------------------------------|------------------|-----------------|-----------------|------------|--------------|-------------------|--------------|
| Tract Income                                                                              | % of Geographies | % of Households | % of Businesses | Branches   |              | Full-Service ATMs |              |
|                                                                                           |                  |                 |                 | #          | %            | #                 | %            |
| Low                                                                                       | 9.3              | 7.8             | 6.5             | 8          | 6.4          | 17                | 8.0          |
| Moderate                                                                                  | 25.6             | 25.4            | 21.8            | 23         | 18.3         | 44                | 20.7         |
| Middle                                                                                    | 29.3             | 32.7            | 30.8            | 37         | 29.4         | 61                | 28.6         |
| Upper                                                                                     | 29.4             | 33.1            | 38.6            | 52         | 41.3         | 76                | 35.7         |
| Unknown                                                                                   | 6.4              | 0.9             | 2.3             | 6          | 4.8          | 15                | 7.0          |
| <b>Total</b>                                                                              | <b>100.0</b>     | <b>100.0</b>    | <b>100.0</b>    | <b>126</b> | <b>100.0</b> | <b>213</b>        | <b>100.0</b> |

Comerica has a large presence in the AA, with more than 10 percent of the 1,305 AA census tracts containing either a branch or full-service ATM. Additionally, a large percentage of the LMI census tracts in the AA are congregated in the region stretching north from downtown Detroit just inland from Lake St. Claire. This region includes more than 35 of the bank's branches, which appropriately service the area.

The bank opened two branches (one in a middle-income and one in an upper-income census tract) and closed 11 branches (two located in moderate-income, four located in middle-income, and five in upper-income census tracts) in the AA. Each of the branches closed served an area that is sufficiently serviced by another location. Therefore, the bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI



geographies or LMI individuals. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.

### ***Community Development Services***

The bank is a leader in providing CD services in the AA. Comerica's employees served in various capacities for 314 organizations offering CD services targeted toward LMI individuals. During the review period, bank employees provided 2,470 CD services totaling 8,171 hours. This represents a substantial increase from the previous evaluation, with the number of qualified CD services growing by 234.2 percent and total hours by 107.2 percent. The bank's efforts in providing qualified services throughout the AA reflect very favorably on Comerica's commitment to addressing the AA needs by giving more than just dollars. Examples of services performed by bank employees include:

- Forty-three bank employees helped facilitate pop-up financial education simulations in partnership with an organization that focuses on elevating young innovators beyond societal constraints. The simulations taught budgeting, savings, credit, and career readiness to students and other young people, more than 75 percent of which were LMI.
- Eighty-three bank employees in the AA provided more than 350 hours of qualified service through a non-profit which empowers high school and college students through targeted education and mentorships with local business professionals. The employees provided education to LMI students regarding financial literacy, goal setting, and career preparedness.
- Bank employees served an organization that provides home ownership tools and services, including downpayment assistance, to LMI individuals in the AA. Services rendered include providing financial education to the organization's beneficiaries and providing counsel on marketing and strategic planning to help organization grow and increase its impact across the area.

**ANN ARBOR MSA ASSESSEMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE ANN ARBOR MSA ASSESSMENT AREA**

- Comerica's Ann Arbor MSA AA consists of the entirety of Washtenaw County, which is also the Ann Arbor, MI MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 107 census tracts, of which 12.1 percent are designated as low-income, 12.1 percent as moderate-income, 37.4 percent as middle-income, 28.0 percent as upper-income, and 10.3 percent as unknown-income.
- Following the 2020 U.S. Census, seven new census tracts were drawn within the AA, decreasing the number of LMI geographies by 23.1 percent.
- The bank operates nine full-service branches in the AA, including one branch in a low-income, one in a moderate-income, four in middle-income, three in upper-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, Comerica had a 8.5 percent market share, ranking 5<sup>th</sup> out of 16 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 28<sup>th</sup> out of 352 HMDA reporters in the AA with 97 HMDA originations and purchases, and 11<sup>th</sup> out of 92 CRA reporters with 133 CRA small business and small farm loans.

**Table 25**

| <b>Population Change</b>                                                                                    |                        |                        |                          |
|-------------------------------------------------------------------------------------------------------------|------------------------|------------------------|--------------------------|
| <b>Assessment Area: Ann Arbor MSA</b>                                                                       |                        |                        |                          |
| <b>Area</b>                                                                                                 | <b>2015 Population</b> | <b>2020 Population</b> | <b>Percentage Change</b> |
| Ann Arbor MSA AA                                                                                            | 354,092                | 372,258                | 5.1                      |
| Michigan                                                                                                    | 9,900,571              | 10,077,331             | 1.8                      |
| Source: 2020 U.S. Census Bureau Decennial Census<br>2011-2015 U.S. Census Bureau: American Community Survey |                        |                        |                          |

- Ann Arbor is the 5<sup>th</sup> largest city in Michigan.
- The AA population grew significantly between 2015 and 2020, more than doubling the statewide growth rate. The rapid growth rate is primarily attributed to the University of Michigan, which has an annual enrollment of 50,000 students, and technology companies drawn to the area by the university's research and development infrastructure.

**Table 26**

| <b>Median Family Income Change</b>                                                                                         |                                  |                                  |                          |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|--------------------------|
| <b>Assessment Area: Ann Arbor MSA</b>                                                                                      |                                  |                                  |                          |
| <b>Area</b>                                                                                                                | <b>2015 Median Family Income</b> | <b>2020 Median Family Income</b> | <b>Percentage Change</b> |
| Ann Arbor MSA AA                                                                                                           | 95,416                           | 105,224                          | 10.3                     |
| Michigan                                                                                                                   | 68,010                           | 75,470                           | 11.0                     |
| Source: 2011-2015 U.S. Census Bureau: American Community Survey<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |                                  |                          |
| Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.                                |                                  |                                  |                          |

- The AA MFI grew at a rate comparable to the statewide. It is noteworthy that the AA MFI in 2020 is 39.4 percent higher than the MFI for the state of Michigan.
- According to FFIEC Census data, 6.3 percent of families in the AA lived below the poverty level, which is lower than the 9.2 percent at the state level.

**Table 27**

| <b>Housing Cost Burden</b>            |                              |                        |                    |                             |                        |                   |
|---------------------------------------|------------------------------|------------------------|--------------------|-----------------------------|------------------------|-------------------|
| <b>Assessment Area: Ann Arbor MSA</b> |                              |                        |                    |                             |                        |                   |
| <b>Area</b>                           | <b>Cost Burden - Renters</b> |                        |                    | <b>Cost Burden - Owners</b> |                        |                   |
|                                       | <b>Low Income</b>            | <b>Moderate Income</b> | <b>All Renters</b> | <b>Low Income</b>           | <b>Moderate Income</b> | <b>All Owners</b> |
| Ann Arbor MSA AA                      | 75.5                         | 25.0                   | 44.6               | 64.6                        | 29.5                   | 18.4              |
| Michigan                              | 74.2                         | 31.3                   | 43.2               | 61.7                        | 26.5                   | 18.2              |

*Cost burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on owners at any other level.
- The AA median age of housing stock is 47 years, points to an aging housing stock. However, the AA median age of housing stock is similar to the statewide, at 49 years.
- Despite the aging housing stock in the AA, the median housing value, at \$278,480 is 71.3 percent higher than the statewide, at \$162,600.

**Table 28**

| <b>Unemployment Rates</b>             |             |             |             |             |             |
|---------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Assessment Area: Ann Arbor MSA</b> |             |             |             |             |             |
| <b>Region</b>                         | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| Ann Arbor MSA AA                      | 3.1         | 2.9         | 6.7         | 4.3         | 3.6         |
| Michigan                              | 4.2         | 4.1         | 10.0        | 5.9         | 4.2         |

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- Generally, the AA unemployment rates are low, trailing the statewide rates between 2018 and 2022. In 2020, the unemployment rates more than doubled due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the unemployment rates stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include healthcare and social assistance, retail trade, professional and technical services, and accommodation and food services.
- A community contact indicated that the University of Michigan in Ann Arbor significantly shapes the AA economy as it employs a substantial number of workers in the AA. The university's impact to the state of Michigan is \$12.1 billion<sup>1</sup>.
- Many technology companies serve as top employers in the AA including JSTOR, ProQuest, and Truven Health Analytics.

Table 29 details selected characteristics of the AA.

<sup>1</sup> Per the Facts & Figures provided by the University of Michigan's website – <https://umich.edu/facts-figures/>.

**Table 29**

| 2022 Combined Demographics<br>Assessment Area: Ann Arbor MSA                                                            |                           |                       |                                    |              |                                  |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                | %            | #                         | %            |
| Low                                                                                                                     | 13                        | 12.1                  | 6,681                              | 8.2          | 1,746                            | 26.1         | 16,915                    | 20.8         |
| Moderate                                                                                                                | 13                        | 12.1                  | 8,250                              | 10.1         | 1,081                            | 13.1         | 14,355                    | 17.7         |
| Middle                                                                                                                  | 40                        | 37.4                  | 35,113                             | 43.2         | 1,354                            | 3.9          | 17,415                    | 21.4         |
| Upper                                                                                                                   | 30                        | 28.0                  | 30,648                             | 37.7         | 772                              | 2.5          | 32,607                    | 40.1         |
| Unknown                                                                                                                 | 11                        | 10.3                  | 600                                | 0.7          | 169                              | 28.2         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>107</b>                | <b>100.0</b>          | <b>81,292</b>                      | <b>100.0</b> | <b>5,122</b>                     | <b>6.3</b>   | <b>81,292</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                  |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                           |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by                               | % by         | #                                | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 18,022                    | 4,152                 | 4.7                                | 23.0         | 12,606                           | 69.9         | 1,264                     | 7.0          |
| Moderate                                                                                                                | 18,144                    | 7,606                 | 8.6                                | 41.9         | 9,361                            | 51.6         | 1,177                     | 6.5          |
| Middle                                                                                                                  | 61,211                    | 41,259                | 46.9                               | 67.4         | 16,959                           | 27.7         | 2,993                     | 4.9          |
| Upper                                                                                                                   | 47,883                    | 34,598                | 39.3                               | 72.3         | 10,746                           | 22.4         | 2,539                     | 5.3          |
| Unknown                                                                                                                 | 6,493                     | 323                   | 0.4                                | 5.0          | 5,430                            | 83.6         | 740                       | 11.4         |
| <b>Total AA</b>                                                                                                         | <b>151,753</b>            | <b>87,938</b>         | <b>100.0</b>                       | <b>57.9</b>  | <b>55,102</b>                    | <b>36.3</b>  | <b>8,713</b>              | <b>5.7</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                  |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                 |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                | %            | #                         | %            |
| Low                                                                                                                     | 1,285                     | 7.4                   | 1,170                              | 7.4          | 107                              | 7.7          | 8                         | 5.5          |
| Moderate                                                                                                                | 1,479                     | 8.5                   | 1,394                              | 8.8          | 78                               | 5.6          | 7                         | 4.8          |
| Middle                                                                                                                  | 7,272                     | 41.8                  | 6,617                              | 41.7         | 581                              | 42.1         | 74                        | 51.0         |
| Upper                                                                                                                   | 6,789                     | 39.0                  | 6,189                              | 39.0         | 546                              | 39.5         | 54                        | 37.2         |
| Unknown                                                                                                                 | 582                       | 3.3                   | 511                                | 3.2          | 69                               | 5.0          | 2                         | 1.4          |
| <b>Total AA</b>                                                                                                         | <b>17,407</b>             | <b>100.0</b>          | <b>15,881</b>                      | <b>100.0</b> | <b>1,381</b>                     | <b>100.0</b> | <b>145</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>91.2</b>  |                                  | <b>7.9</b>   |                           | <b>0.8</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                  |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                 |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                | %            | #                         | %            |
| Low                                                                                                                     | 7                         | 2.0                   | 7                                  | 2.1          | 0                                | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 9                         | 2.6                   | 9                                  | 2.6          | 0                                | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                  | 226                       | 65.7                  | 223                                | 65.6         | 3                                | 100.0        | 0                         | 0.0          |
| Upper                                                                                                                   | 102                       | 29.7                  | 101                                | 29.7         | 0                                | 0.0          | 1                         | 100.0        |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>344</b>                | <b>100.0</b>          | <b>340</b>                         | <b>100.0</b> | <b>3</b>                         | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>98.8</b>  |                                  | <b>0.9</b>   |                           | <b>0.3</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                  |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                  |              |                           |              |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the AA is good. Comerica's small business lending generally carried more weight when assessing performance, as this product represents the highest volume of lending in the AA during the review period. Additionally, only home refinance and home improvement loans were evaluated separately, as the other home mortgage lending products did not have sufficient volume to conduct a meaningful analysis.

Details of the bank's 2020 mortgage and small business lending and aggregate data can be found in Appendix C.

#### **Lending Activity**

Comerica's lending activity reflects good responsiveness to the AA credit needs. The bank makes use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs. During the review period, Comerica originated 460 SBA loans and 79 small business micro loans, for a combined total of \$89.9 million.

The bank extended 296 home mortgage and 719 small business loans between January 1, 2020, and December 31, 2022. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

#### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects adequate penetration throughout the AA. The bank's small business and home mortgage lending performance among geographies of different income levels is consistent with the overall performance. The distribution of Comerica's lending in middle- and upper-income geographies did not affect conclusions about the bank's lending performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects adequate penetration throughout the AA. The 2021 and 2022 distribution of home mortgage lending among low-income census tracts is comparable to aggregate data and the percentage of owner-occupied units. Among moderate-income census tracts, the bank performed below aggregate data but comparable to the demographic figure.

The bank's 2020 lending performance is consistent with Comerica's 2021 and 2022 performance, with penetration levels slightly below aggregate data and the demographic figure in LMI geographies.

### *Home Refinance Lending*

Comerica's geographic distribution of home refinance lending is adequate. Distribution of 2021 home refinance loans among LMI census tracts in the AA is comparable to aggregate lending performance and the demographic figure. In 2022, the bank made no home refinance loans in low-income census tracts; however, the distribution among moderate-income geographies is comparable to aggregate data and the demographic figure. The lack of home refinance loans in low-income areas aligns with the overall decrease in the number of originations in 2022. The sharp decrease is primarily due to rising interest rates.

The bank's 2020 lending performance is consistent with its 2021 and 2022 performance, with a distribution of loans in LMI census tracts comparable to aggregate data but below the demographics.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is good. The 2021 and 2022 distribution of home improvement loans among low-income census tracts is comparable aggregate data and the demographic figure. In moderate-income census tracts, the bank's 2021 and 2022 home improvement lending performance is below aggregate data and the demographic figure. Despite increases in interest rates and a 23.1 percent decrease of LMI geographies in the AA, Comerica sustained its lending levels in 2022.

The bank's 2020 lending performance in low-income tracts is below aggregate and demographic data while in moderate-income geographies, Comerica's performance exceeds aggregate data and is comparable to demographics.

Table 30A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ann Arbor MSA                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 8.4   | 0       | 0.0   | 5.0   | 1    | 16.7  | 6.9   | 260     | 19.5  | 4.0   | 4.7                          |
| Moderate                                                                         | 2                                | 33.3  | 14.1  | 417     | 26.7  | 10.4  | 2    | 33.3  | 10.5  | 439     | 33.0  | 6.2   | 8.6                          |
| Middle                                                                           | 1                                | 16.7  | 45.6  | 165     | 10.6  | 43.3  | 3    | 50.0  | 50.9  | 632     | 47.5  | 46.6  | 46.9                         |
| Upper                                                                            | 3                                | 50.0  | 31.2  | 979     | 62.7  | 40.7  | 0    | 0.0   | 31.1  | 0       | 0.0   | 42.1  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 0    | 0.0   | 0.7   | 0       | 0.0   | 1.1   | 0.4                          |
| Total                                                                            | 6                                | 100.0 | 100.0 | 1,561   | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 1,331   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 1                                | 2.0   | 4.8   | 75      | 0.7   | 3.0   | 0    | 0.0   | 5.0   | 0       | 0.0   | 2.8   | 4.7                          |
| Moderate                                                                         | 4                                | 8.2   | 10.8  | 497     | 4.8   | 7.6   | 3    | 10.3  | 11.3  | 499     | 7.3   | 7.1   | 8.6                          |
| Middle                                                                           | 26                               | 53.1  | 46.2  | 5,769   | 55.3  | 41.9  | 11   | 37.9  | 47.5  | 2,246   | 33.0  | 42.3  | 46.9                         |
| Upper                                                                            | 18                               | 36.7  | 38.0  | 4,092   | 39.2  | 47.2  | 15   | 51.7  | 35.4  | 4,069   | 59.7  | 46.2  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.7   | 0       | 0.0   | 1.6   | 0.4                          |
| Total                                                                            | 49                               | 100.0 | 100.0 | 10,433  | 100.0 | 100.0 | 29   | 100.0 | 100.0 | 6,814   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 2                                | 6.9   | 4.8   | 108     | 2.7   | 4.2   | 2    | 5.7   | 3.3   | 110     | 2.4   | 1.6   | 4.7                          |
| Moderate                                                                         | 1                                | 3.4   | 10.4  | 100     | 2.5   | 6.0   | 1    | 2.9   | 6.3   | 100     | 2.2   | 4.5   | 8.6                          |
| Middle                                                                           | 12                               | 41.4  | 40.3  | 1,375   | 34.7  | 37.3  | 18   | 51.4  | 48.8  | 2,242   | 48.3  | 41.9  | 46.9                         |
| Upper                                                                            | 14                               | 48.3  | 44.5  | 2,374   | 60.0  | 52.4  | 14   | 40.0  | 41.5  | 2,191   | 47.2  | 51.9  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.4                          |
| Total                                                                            | 29                               | 100.0 | 100.0 | 3,957   | 100.0 | 100.0 | 35   | 100.0 | 100.0 | 4,643   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 54.0  | 0       | 0.0   | 42.0  | 0    | 0.0   | 18.4  | 0       | 0.0   | 15.9  | 25.3                         |
| Moderate                                                                         | 0                                | 0.0   | 10.0  | 0       | 0.0   | 13.5  | 0    | 0.0   | 18.4  | 0       | 0.0   | 38.7  | 17.7                         |
| Middle                                                                           | 0                                | 0.0   | 22.0  | 0       | 0.0   | 23.0  | 1    | 33.3  | 22.4  | 22,600  | 85.1  | 7.2   | 27.0                         |
| Upper                                                                            | 1                                | 100.0 | 12.0  | 425     | 100.0 | 16.3  | 1    | 33.3  | 20.4  | 1,250   | 4.7   | 31.9  | 19.4                         |
| Unknown                                                                          | 0                                | 0.0   | 2.0   | 0       | 0.0   | 5.2   | 1    | 33.3  | 20.4  | 2,700   | 10.2  | 6.3   | 10.7                         |
| Total                                                                            | 1                                | 100.0 | 100.0 | 425     | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 26,550  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 5                                | 4.8   | 6.1   | 328     | 1.7   | 7.7   | 4    | 4.1   | 5.8   | 420     | 1.0   | 5.6   | 4.7                          |
| Moderate                                                                         | 7                                | 6.7   | 11.9  | 1,014   | 5.4   | 9.1   | 6    | 6.2   | 10.1  | 1,038   | 2.4   | 11.6  | 8.6                          |
| Middle                                                                           | 47                               | 45.2  | 45.7  | 8,492   | 45.1  | 40.3  | 44   | 45.4  | 49.5  | 29,460  | 67.9  | 38.8  | 46.9                         |
| Upper                                                                            | 45                               | 43.3  | 36.0  | 8,980   | 47.7  | 41.9  | 41   | 42.3  | 33.9  | 9,286   | 21.4  | 41.9  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.9   | 2    | 2.1   | 0.7   | 3,200   | 7.4   | 2.1   | 0.4                          |
| Total                                                                            | 104                              | 100.0 | 100.0 | 18,814  | 100.0 | 100.0 | 97   | 100.0 | 100.0 | 43,404  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

**Table 30B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ann Arbor MSA                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 2                                | 11.1  | 1.4   | 145     | 6.5   | 0.7   | 0    | 0.0   | 3.5   | 0       | 0.0   | 1.8   | 4.7                          |
| Moderate                                                                         | 0                                | 0.0   | 9.1   | 0       | 0.0   | 8.3   | 0    | 0.0   | 5.4   | 0       | 0.0   | 3.4   | 8.6                          |
| Middle                                                                           | 7                                | 38.9  | 45.9  | 980     | 43.8  | 38.6  | 11   | 47.8  | 50.2  | 1,740   | 43.3  | 45.3  | 46.9                         |
| Upper                                                                            | 9                                | 50.0  | 43.6  | 1,110   | 49.7  | 52.5  | 11   | 47.8  | 40.7  | 1,776   | 44.2  | 49.1  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1    | 4.3   | 0.2   | 500     | 12.5  | 0.3   | 0.4                          |
| Tract-Unk                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                            | 18                               | 100.0 | 100.0 | 2,235   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 4,016   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 6.1   | 0       | 0.0   | 5.0   | 1    | 100.0 | 4.2   | 50      | 100.0 | 1.8   | 4.7                          |
| Moderate                                                                         | 0                                | 0.0   | 11.1  | 0       | 0.0   | 5.3   | 0    | 0.0   | 11.5  | 0       | 0.0   | 6.0   | 8.6                          |
| Middle                                                                           | 1                                | 100.0 | 41.7  | 203     | 100.0 | 31.3  | 0    | 0.0   | 51.0  | 0       | 0.0   | 37.3  | 46.9                         |
| Upper                                                                            | 0                                | 0.0   | 40.0  | 0       | 0.0   | 55.2  | 0    | 0.0   | 32.3  | 0       | 0.0   | 52.0  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 1.1   | 0       | 0.0   | 3.2   | 0    | 0.0   | 1.0   | 0       | 0.0   | 2.9   | 0.4                          |
| Tract-Unk                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                            | 1                                | 100.0 | 100.0 | 203     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 50      | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 26.9  | 0       | 0.0   | 17.9  | 0    | 0.0   | 10.3  | 0       | 0.0   | 6.0   | 4.7                          |
| Moderate                                                                         | 0                                | 0.0   | 17.3  | 0       | 0.0   | 15.6  | 0    | 0.0   | 15.4  | 0       | 0.0   | 7.0   | 8.6                          |
| Middle                                                                           | 0                                | 0.0   | 42.3  | 0       | 0.0   | 48.9  | 0    | 0.0   | 38.5  | 0       | 0.0   | 24.7  | 46.9                         |
| Upper                                                                            | 0                                | 0.0   | 13.5  | 0       | 0.0   | 17.6  | 0    | 0.0   | 30.8  | 0       | 0.0   | 41.9  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 5.1   | 0       | 0.0   | 20.4  | 0.4                          |
| Tract-Unk                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The 2021 and 2022 distribution of small business loans among low-income census tracts is comparable to aggregate data as well as the percentage of businesses in these tracts. Comerica's 2021 small business lending in moderate-income census tracts is below aggregate data and the demographic figure, while the 2022 performance is comparable to aggregate lending and the demographic figure.

The bank's 2020 lending performance is consistent with that of 2021 and 2022, with the bank performing comparable to aggregate data in LMI census tracts.



**Table 31**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Ann Arbor MSA                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                   | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                          |
| Low                                                                               | 16                               | 6.8   | 8.4   | 3,505   | 9.0   | 7.5   | 8    | 6.1   | 6.6   | 1,503   | 4.8   | 4.4   | 7.4                      |
| Moderate                                                                          | 12                               | 5.1   | 9.4   | 1,529   | 3.9   | 6.0   | 10   | 7.6   | 8.5   | 3,268   | 10.5  | 8.1   | 8.5                      |
| Middle                                                                            | 118                              | 49.8  | 45.5  | 17,582  | 45.3  | 45.4  | 59   | 45.0  | 44.1  | 16,156  | 51.7  | 44.6  | 41.8                     |
| Upper                                                                             | 80                               | 33.8  | 31.7  | 14,039  | 36.2  | 32.4  | 47   | 35.9  | 38.7  | 8,221   | 26.3  | 39.5  | 39.0                     |
| Unknown                                                                           | 11                               | 4.6   | 4.7   | 2,140   | 5.5   | 8.7   | 7    | 5.3   | 1.7   | 2,090   | 6.7   | 3.2   | 3.3                      |
| Total                                                                             | 237                              | 100.0 | 100.0 | 38,795  | 100.0 | 100.0 | 131  | 100.0 | 100.0 | 31,238  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic characteristics and the performance of aggregate HMDA lenders. The 2021 and 2022 dispersion of home mortgage loans among LMI borrowers in the AA exceeds the aggregate lenders' performance and is comparable to the demographic figure. Aggregate data serves as a better proxy for loan demand than the demographic figure.

The bank's home mortgage lending to low-income borrowers in the Ann Arbor MSA AA was greater than the performance of aggregate lenders in both 2021 and 2022 by a consistent margin. Though the bank's performance was below the percentage of families in the AA categorized as low-income, it reflects favorably on the bank's responsiveness to the credit needs of low-income borrowers in the AA while also operating in a safe and sound manner. Among moderate-income borrowers, the bank also outperformed aggregate HMDA lenders by a steady margin, though in this demographic, the bank also performed above the percentage of AA families categorized as moderate-income.

Comerica's 2020 lending performance is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that exceeds aggregate data and is below to the demographic figure.

**Table 32A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ann Arbor MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|----------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                            | 0                                | 0.0   | 11.3  | 0       | 0.0   | 5.6   | 0    | 0.0   | 10.9  | 0       | 0.0   | 5.0   | 20.8                              |
| Moderate                                                                                                       | 2                                | 33.3  | 21.9  | 402     | 25.8  | 16.0  | 3    | 50.0  | 20.3  | 735     | 55.2  | 14.4  | 17.7                              |
| Middle                                                                                                         | 3                                | 50.0  | 22.2  | 902     | 57.8  | 21.2  | 1    | 16.7  | 21.6  | 156     | 11.7  | 20.6  | 21.4                              |
| Upper                                                                                                          | 1                                | 16.7  | 33.5  | 257     | 16.5  | 46.0  | 1    | 16.7  | 34.0  | 260     | 19.5  | 48.0  | 40.1                              |
| Unknown                                                                                                        | 0                                | 0.0   | 11.0  | 0       | 0.0   | 11.2  | 1    | 16.7  | 13.2  | 180     | 13.5  | 12.0  | 0.0                               |
| Total                                                                                                          | 6                                | 100.0 | 100.0 | 1,561   | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 1,331   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                            | 11                               | 22.4  | 10.3  | 1,391   | 13.3  | 5.7   | 7    | 24.1  | 16.7  | 600     | 8.8   | 9.8   | 20.8                              |
| Moderate                                                                                                       | 10                               | 20.4  | 20.2  | 1,960   | 18.8  | 14.8  | 4    | 13.8  | 25.8  | 555     | 8.1   | 20.2  | 17.7                              |
| Middle                                                                                                         | 12                               | 24.5  | 23.3  | 2,876   | 27.6  | 21.4  | 8    | 27.6  | 21.2  | 1,904   | 27.9  | 20.6  | 21.4                              |
| Upper                                                                                                          | 15                               | 30.6  | 36.0  | 4,131   | 39.6  | 47.7  | 9    | 31.0  | 27.9  | 3,305   | 48.5  | 40.0  | 40.1                              |
| Unknown                                                                                                        | 1                                | 2.0   | 10.2  | 75      | 0.7   | 10.4  | 1    | 3.4   | 8.4   | 450     | 6.6   | 9.4   | 0.0                               |
| Total                                                                                                          | 49                               | 100.0 | 100.0 | 10,433  | 100.0 | 100.0 | 29   | 100.0 | 100.0 | 6,814   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                            | 1                                | 3.4   | 9.4   | 50      | 1.3   | 6.2   | 7    | 20.0  | 9.5   | 535     | 11.5  | 6.2   | 20.8                              |
| Moderate                                                                                                       | 9                                | 31.0  | 17.5  | 670     | 16.9  | 12.6  | 9    | 25.7  | 22.5  | 959     | 20.7  | 18.1  | 17.7                              |
| Middle                                                                                                         | 5                                | 17.2  | 24.9  | 260     | 6.6   | 20.8  | 7    | 20.0  | 24.1  | 712     | 15.3  | 20.7  | 21.4                              |
| Upper                                                                                                          | 13                               | 44.8  | 46.5  | 2,879   | 72.8  | 57.1  | 10   | 28.6  | 43.2  | 2,041   | 44.0  | 54.0  | 40.1                              |
| Unknown                                                                                                        | 1                                | 3.4   | 1.7   | 98      | 2.5   | 3.3   | 2    | 5.7   | 0.7   | 396     | 8.5   | 1.0   | 0.0                               |
| Total                                                                                                          | 29                               | 100.0 | 100.0 | 3,957   | 100.0 | 100.0 | 35   | 100.0 | 100.0 | 4,643   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                            | 15                               | 14.6  | 10.6  | 1,721   | 9.4   | 5.7   | 15   | 16.0  | 12.2  | 1,264   | 7.5   | 6.2   | 20.8                              |
| Moderate                                                                                                       | 23                               | 22.3  | 20.6  | 3,097   | 16.8  | 15.2  | 24   | 25.5  | 22.1  | 3,254   | 19.3  | 16.0  | 17.7                              |
| Middle                                                                                                         | 26                               | 25.2  | 22.9  | 4,691   | 25.5  | 21.3  | 23   | 24.5  | 22.0  | 3,958   | 23.5  | 20.6  | 21.4                              |
| Upper                                                                                                          | 37                               | 35.9  | 35.6  | 8,707   | 47.3  | 47.3  | 28   | 29.8  | 33.6  | 7,352   | 43.6  | 46.4  | 40.1                              |
| Unknown                                                                                                        | 2                                | 1.9   | 10.2  | 173     | 0.9   | 10.6  | 4    | 4.3   | 10.1  | 1,026   | 6.1   | 10.8  | 0.0                               |
| Total                                                                                                          | 103                              | 100.0 | 100.0 | 18,389  | 100.0 | 100.0 | 94   | 100.0 | 100.0 | 16,854  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table 32B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ann Arbor MSA                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 3                                | 16.7  | 7.8   | 280     | 12.5  | 6.2   | 1    | 4.3   | 8.3   | 129     | 3.2   | 4.6   | 20.8                              |
| Moderate                                                                                                                                                    | 2                                | 11.1  | 18.2  | 65      | 2.9   | 12.5  | 8    | 34.8  | 21.3  | 1,005   | 25.0  | 14.4  | 17.7                              |
| Middle                                                                                                                                                      | 5                                | 27.8  | 24.7  | 450     | 20.1  | 22.7  | 6    | 26.1  | 28.5  | 1,136   | 28.3  | 27.5  | 21.4                              |
| Upper                                                                                                                                                       | 8                                | 44.4  | 48.3  | 1,440   | 64.4  | 58.1  | 8    | 34.8  | 40.1  | 1,746   | 43.5  | 51.7  | 40.1                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 1.0   | 0       | 0.0   | 0.6   | 0    | 0.0   | 1.9   | 0       | 0.0   | 1.8   | 0.0                               |
| Total                                                                                                                                                       | 18                               | 100.0 | 100.0 | 2,235   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 4,016   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 13.9  | 0       | 0.0   | 6.1   | 0    | 0.0   | 13.5  | 0       | 0.0   | 5.2   | 20.8                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 22.8  | 0       | 0.0   | 13.6  | 0    | 0.0   | 24.5  | 0       | 0.0   | 16.7  | 17.7                              |
| Middle                                                                                                                                                      | 1                                | 100.0 | 23.3  | 203     | 100.0 | 17.8  | 1    | 100.0 | 21.4  | 50      | 100.0 | 15.7  | 21.4                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 36.7  | 0       | 0.0   | 59.0  | 0    | 0.0   | 34.9  | 0       | 0.0   | 52.5  | 40.1                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 3.3   | 0       | 0.0   | 3.6   | 0    | 0.0   | 5.7   | 0       | 0.0   | 9.9   | 0.0                               |
| Total                                                                                                                                                       | 1                                | 100.0 | 100.0 | 203     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 50      | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 1.9   | 0       | 0.0   | 0.7   | 0    | 0.0   | 2.6   | 0       | 0.0   | 1.0   | 20.8                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.7                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.4                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.1                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 98.1  | 0       | 0.0   | 99.3  | 0    | 0.0   | 97.4  | 0       | 0.0   | 99.0  | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of business is adequate. The 2021 and 2022 loan distribution to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA as well as aggregate lending. Aggregate data serves as a better proxy for loan demand than the demographic figure; therefore, being below the demographic figure does not reflect poorly on the bank's performance. Given the conclusion of the SBA's PPP in 2021 and rising interests in 2022, Comerica's sustained performance is favorably viewed in light of significant decline in the number of small business loans extended. Moreover, the bank's 2022 performance by dollar amount is comparable to aggregate data, which is an improvement from 2021 and reflects Comerica's willingness to extend larger dollar amount loans to small businesses.

The bank's 2020 small business lending performance among businesses with revenues of \$1 million or less is above aggregate data.

**Table 33**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|
| Assessment Area: Ann Arbor MSA                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |
|                                                                                    | Bank                             |       |       | Agg     |       |       | Bank |       |       | Agg     |       |       |
|                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |
| <b>\$1 Million or Less</b>                                                         | 95                               | 40.1  | 45.3  | 7,150   | 18.4  | 27.1  | 46   | 35.1  | 50.2  | 10,311  | 33.0  | 33.2  |
| <b>Over \$1 Million</b>                                                            | 83                               | 35.0  |       | 23,757  | 61.2  |       | 73   | 55.7  |       | 18,959  | 60.7  |       |
| <b>Revenue Unknown</b>                                                             | 59                               | 24.9  |       | 7,888   | 20.3  |       | 12   | 9.2   |       | 1,968   | 6.3   |       |
| <b>Total</b>                                                                       | 237                              | 100.0 |       | 38,795  | 100.0 |       | 131  | 100.0 |       | 31,238  | 100.0 |       |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |
| <b>\$100,000 or Less</b>                                                           | 150                              | 63.3  | 90.1  | 5,884   | 15.2  | 30.9  | 62   | 47.3  | 95.1  | 3,888   | 12.4  | 44.3  |
| <b>\$100,001 - \$250,000</b>                                                       | 40                               | 16.9  | 5.6   | 7,147   | 18.4  | 20.3  | 29   | 22.1  | 2.8   | 5,828   | 18.7  | 16.8  |
| <b>\$250,001 - \$1 Million</b>                                                     | 47                               | 19.8  | 4.3   | 25,764  | 66.4  | 48.8  | 40   | 30.5  | 2.1   | 21,522  | 68.9  | 38.9  |
| <b>Total</b>                                                                       | 237                              | 100.0 | 100.0 | 38,795  | 100.0 | 100.0 | 131  | 100.0 | 100.0 | 31,238  | 100.0 | 100.0 |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |
| <b>\$100,000 or Less</b>                                                           | 76                               | 80.0  |       | 2,695   | 37.7  |       | 23   | 50.0  |       | 1,415   | 13.7  |       |
| <b>\$100,001 - \$250,000</b>                                                       | 13                               | 13.7  |       | 2,175   | 30.4  |       | 9    | 19.6  |       | 1,790   | 17.4  |       |
| <b>\$250,001 - \$1 Million</b>                                                     | 6                                | 6.3   |       | 2,280   | 31.9  |       | 14   | 30.4  |       | 7,106   | 68.9  |       |
| <b>Total</b>                                                                       | 95                               | 100.0 |       | 7,150   | 100.0 |       | 46   | 100.0 |       | 10,311  | 100.0 |       |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |

### Community Development Lending

The bank is a leader in making CD loans in the AA. During the review period, Comerica originated 35 qualified CD loans totaling \$197.0 million. Since the previous evaluation, the number of CD loans in the AA grew by 45.8 percent by number volume and 323.8 percent by dollar amount.

Comerica made efforts to fill the void left by the cessation of the SBA's PPP in May 2021, with a specific focus on promoting economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Examples of the bank's CD lending activities that were considered responsive to the credit needs of the AA include:

- A \$25 million line of credit to support an organization providing evidence-based counseling and virtual access to doctors for patients suffering from substance abuse, of which the majority receives Medicaid and are considered LMI individuals.
- A \$22.6 million loan for the purchase of a 184-unit LIHTC apartment complex to provide affordable housing in the bank's AA.
- A \$5 million line of credit to meet the cash flow needs of an organization that provides education and significant after-school programming for charter school students, of which 90 percent come from LMI families.

**Table 34**

| <b>Community Development Lending<br/>Assessment Area: Ann Arbor MSA</b> |           |                |
|-------------------------------------------------------------------------|-----------|----------------|
| <b>Purpose</b>                                                          | <b>#</b>  | <b>\$000s</b>  |
| Affordable Housing                                                      | 1         | 22,600         |
| Community Services                                                      | 8         | 43,860         |
| Economic Development                                                    | 22        | 126,307        |
| Revitalization and Stabilization                                        | 4         | 4,194          |
| <b>Total</b>                                                            | <b>35</b> | <b>196,961</b> |

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is good. The bank is occasionally in a leadership position given the significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. The dollar amount of CD investments and grants made in the AA grew by 12.5 percent since the previous evaluation. Though the bank makes rare use of innovative and/or complex investments, Comerica exhibits good responsiveness to credit and CD needs of the AA.

Table 35 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. An example of a CD investment that is notably responsive to the AA is a \$3 million LIHTC equity investment in a newly constructed 50-unit apartment complex specifically targeted to serve families, including those with special needs. The development includes discounted rents as well as 30 units that will be fully subsidized to target the chronically homeless.

**Table 35**

| <b>Investment, Grants, and Donations<br/>Assessment Area: Ann Arbor MSA</b> |                                                 |                 |                                            |                 |                  |                 |              |                 |
|-----------------------------------------------------------------------------|-------------------------------------------------|-----------------|--------------------------------------------|-----------------|------------------|-----------------|--------------|-----------------|
| <b>Community Development<br/>Purpose</b>                                    | <b>Prior Period<br/>Investments<sup>1</sup></b> |                 | <b>Current<br/>Investments<sup>2</sup></b> |                 | <b>Donations</b> |                 | <b>Total</b> |                 |
|                                                                             | <b>#</b>                                        | <b>\$(000s)</b> | <b>#</b>                                   | <b>\$(000s)</b> | <b>#</b>         | <b>\$(000s)</b> | <b>#</b>     | <b>\$(000s)</b> |
| Affordable Housing                                                          | 7                                               | 5,043           | 2                                          | 4,600           | 3                | 25              | 12           | 9,668           |
| Community Services                                                          | 0                                               | 0               | 0                                          | 0               | 16               | 63              | 16           | 63              |
| Economic Development                                                        | 0                                               | 0               | 0                                          | 0               | 0                | 0               | 0            | 0               |
| Revitalization and Stabilization                                            | 0                                               | 0               | 0                                          | 0               | 1                | 5               | 1            | 5               |
| <b>Total</b>                                                                | <b>7</b>                                        | <b>5,043</b>    | <b>2</b>                                   | <b>4,600</b>    | <b>20</b>        | <b>93</b>       | <b>29</b>    | <b>9,736</b>    |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

The bank's Service Test performance is good.

### **Retail Services**

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of Comerica's nine branches and 13 ATMs as of April

1, 2023, was compared to the distribution of the households and businesses among the income tract categories. Table 36 summarizes the bank's retail locations in the AA.

**Table 36**

| <b>Branch and Full-Service ATM Locations<br/>Assessment Area: Ann Arbor MSA</b> |                             |                            |                            |                 |              |                          |              |
|---------------------------------------------------------------------------------|-----------------------------|----------------------------|----------------------------|-----------------|--------------|--------------------------|--------------|
| <b>Tract<br/>Income</b>                                                         | <b>% of<br/>Geographies</b> | <b>% of<br/>Households</b> | <b>% of<br/>Businesses</b> | <b>Branches</b> |              | <b>Full-Service ATMs</b> |              |
|                                                                                 |                             |                            |                            | <b>#</b>        | <b>%</b>     | <b>#</b>                 | <b>%</b>     |
| Low                                                                             | 12.1                        | 11.7                       | 7.3                        | 1               | 11.1         | 1                        | 7.7          |
| Moderate                                                                        | 12.1                        | 11.9                       | 8.4                        | 1               | 11.1         | 1                        | 7.7          |
| Middle                                                                          | 37.4                        | 40.7                       | 42.2                       | 4               | 44.4         | 6                        | 46.2         |
| Upper                                                                           | 28.0                        | 31.7                       | 38.8                       | 3               | 33.3         | 4                        | 30.8         |
| Unknown                                                                         | 10.3                        | 4.0                        | 3.3                        | 0               | 0.0          | 1                        | 7.7          |
| <b>Total</b>                                                                    | <b>100.0</b>                | <b>100.0</b>               | <b>100.0</b>               | <b>9</b>        | <b>100.0</b> | <b>13</b>                | <b>100.0</b> |

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations are basically the same throughout the AA; thus, they do not vary in a way that inconveniences LMI geographies or LMI individuals.

### ***Community Development Services***

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for organizations offering CD services targeted toward LMI individuals. During the review period, bank employees provided 47 CD services totaling 125 hours, representing an 80.8 percent increase in number volume since the previous evaluation. Examples of services performed by bank employees include:

- An employee serving on the board of directors for an organization that supports homeless families by providing housing as well as career training and financial education.
- Bank employees provided financial education and resources to small business owners and aspiring entrepreneurs as part of a program that actively facilitates, educates, and advocates for small businesses in the AA.

## **METROPOLITAN ASSESSMENT AREAS (LIMITED-SCOPE REVIEW)**

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE MICHIGAN METROPOLITAN ASSESSMENT AREAS**

The bank's branch operations and deposit market share for each metropolitan AA receiving a limited-scope review were determined as of April 1, 2023, and June 30, 2022, respectively.

- **Battle Creek, MI MSA AA**

- The Battle Creek, MI MSA AA is comprised of the entirety of Calhoun County, which is coterminous with the Battle Creek, MI MSA.
- The AA is comprised of 40 census tracts, including three low-, 13 moderate-, 15 middle-, and nine upper-income tracts.
- Based upon 2020 ACS data, the AA population was 134,310, which reflects a 0.4 percent decrease from the 2015 ACS data.
- The AA includes 33,314 families, 21.9 percent are low-, 17.2 percent moderate-, 19.8 percent middle-, and 41.2 percent are upper-income.
- The bank operated four branches, representing 1.0 percent of its total branches.
- Comerica held \$259.3 million in deposits, representing a market share of 17.7 percent and 0.3 percent of the bank's total deposits.

- **Flint, MI MSA AA**

- The Flint, MI MSA AA is comprised of the entirety of Genesee County, which is coterminous with the Flint, MI MSA.
- The AA is comprised of 134 census tracts, which includes 16 low-, 33 moderate-, 41 middle-, 39 upper-, and five unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 406,211, which reflects a 2.3 percent decrease from the 2015 ACS data.
- The AA includes 108,430 families, 21.3 percent are low-, 17.5 percent moderate-, 20.8 percent middle-, and 40.5 percent are upper-income.
- The bank operated one branch, representing 0.2 percent of its total branches.
- Comerica held \$57.6 million in deposits, representing a market share of 1.0 percent and 0.1 percent of the bank's total deposits.

- **Grand Rapids-Kentwood Metropolitan AA**

- The Grand Rapids-Kentwood Metropolitan AA is comprised of the entirety of Ottawa and Kent counties which, along with Ionia and Montcalm counties (excluded from the delineation) make up the Grand Rapids-Kentwood, MI MSA.
- The AA is comprised of 210 census tracts, including 11 low-, 38 moderate-, 104 middle-, 53 upper-, and four unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 954,174, which reflects a 6.5 percent increase from the 2015 ACS data.
- The AA includes 237,965 families, 18.0 percent are low-, 17.9 percent moderate-, 23.2 percent middle-, and 40.9 percent are upper-income.
- The bank operated 11 branches, representing 2.7 percent of its total branches.
- Comerica held \$646.6 million in deposits, representing a market share of 2.2 percent and 0.8 percent of the bank's total deposits.

- **Jackson, MI MSA AA**

- The Jackson, MI MSA AA is comprised of the entirety of Jackson County, which is coterminous with the Jackson, MI MSA.
- The AA is comprised of 46 census tracts, including three low-, 14 moderate-, 15 middle-, 12 upper-, and two unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 160,366, which reflects a 0.4 percent increase from the 2015 ACS data.
- The AA includes 39,908 families, 18.7 percent are low-, 19.0 percent moderate-, 21.0 percent middle-, and 41.3 percent are upper-income.
- The bank operated seven branches, representing 1.7 percent of its total branches.
- Comerica held \$550.9 million in deposits, representing a market share of 19.5 percent and 0.7 percent of the bank's total deposits.

- **Kalamazoo-Portage, MI MSA AA**

- The Kalamazoo, MI MSA AA is comprised of the entirety of Kalamazoo County, which is coterminous with the Kalamazoo-Portage, MI MSA.
- The AA is comprised of 68 census tracts, which include six low-, 17 moderate-, 23 middle-, 21 upper-, and one unknown-income tract.
- Based upon 2020 ACS data, the AA population was 261,752, which reflects a 1.9 percent increase from the 2015 ACS data.
- The AA includes 62,664 families, 21.5 percent are low-, 18.3 percent moderate-, 19.7 percent middle-, and 40.5 percent are upper-income.
- The bank operated six branches, representing 1.5 percent of its total branches.
- Comerica held \$324.4 million in deposits, representing a market share of 6.9 percent and 0.4 percent of the bank's total deposits.

- **Lansing-East Lansing Metropolitan AA**

- The Lansing-East Lansing Metropolitan AA is comprised of the entirety of Eaton, Clinton, and Ingham counties which, along with Shiawassee County (excluded from the delineation) make up the Lansing-East Lansing, MI MSA.
- The AA is comprised of 136 census tracts, including seven low-, 26 moderate-, 57 middle-, 34 upper-, and 12 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 473,203, which reflects a 1.0 percent increase from the 2015 ACS data.
- The AA includes 111,157 families, 20.0 percent are low-, 17.0 percent moderate-, 21.8 percent middle-, and 41.2 percent are upper-income.
- The bank operated six branches, representing 1.5 percent of its total branches.
- Comerica held \$649.0 million in deposits, representing a market share of 6.1 percent and 0.8 percent of the bank's total deposits.

- **Midland, MI MSA AA**

- The Midland, MI MSA AA is comprised of the entirety of Midland County, which is coterminous with the Midland, MI MSA.
- The AA is comprised of 21 census tracts, including one low-, four moderate-, 12 middle-, and four upper-income tracts.
- Based upon 2020 ACS data, the AA population was 83,494, which reflects a 0.2 percent decrease from the 2015 ACS data.
- The AA includes 23,057 families, 19.8 percent are low-, 18.1 percent moderate-, 22.0 percent middle-, and 40.0 percent are upper-income.
- The bank operated two branches, representing 0.5 percent of its total branches.



- Comerica held \$130.8 million in deposits, representing a market share of 11.3 percent and 0.2 percent of the bank's total deposits.
- **Muskegon, MI MSA AA**
  - The Muskegon, MI MSA AA is comprised of the entirety of Muskegon County, which is coterminous with the Muskegon, MI MSA.
  - The AA is comprised of 46 census tracts, including five low-, eight moderate-, 21 middle-, 11 upper-, and one unknown-income tracts.
  - Based upon 2020 ACS data, the AA population was 175,824, which reflects a 2.5 percent increase from the 2015 ACS data.
  - The AA includes 44,390 families, 20.4 percent are low-, 18.7 percent moderate-, 21.2 percent middle-, and 39.8 percent are upper-income.
  - The bank operated four branches, representing 1.0 percent of its total branches.
  - Comerica held \$234.3 million in deposits, representing a market share of 10.6 percent and 0.3 percent of the bank's total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix D contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 37 discusses conclusions regarding the bank's performance.

**Table 37**

| Assessment Area                       | Lending Test | Investment Test | Service Test |
|---------------------------------------|--------------|-----------------|--------------|
| Battle Creek, MI MSA AA               | Consistent   | Below           | Consistent   |
| Flint, MI MSA AA                      | Below        | Below           | Below        |
| Grand Rapids-Kentwood Metropolitan AA | Consistent   | Consistent      | Consistent   |
| Jackson, MI MSA AA                    | Consistent   | Consistent      | Consistent   |
| Kalamazoo-Portage MSA AA              | Consistent   | Consistent      | Consistent   |
| Lansing-East Lansing Metropolitan AA  | Consistent   | Consistent      | Consistent   |
| Midland, MI MSA AA                    | Below        | Below           | Below        |
| Muskegon, MI MSA AA                   | Consistent   | Consistent      | Consistent   |

The institution's lending, investment, service performance in the AAs is generally consistent with the overall state performance.

## NONMETROPOLITAN AREA (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF OPERATIONS

- **Lenawee County Nonmetropolitan AA**
  - The Lenawee County Nonmetropolitan AA is comprised of the entirety of Lenawee County.
  - The AA is comprised of 25 census tracts, including five moderate-, 14 middle-, and six upper-income tracts.
  - Based upon 2020 ACS data, the AA population was 99,423, which reflects a 0.5 percent increase from the 2015 ACS data.
  - The AA includes 25,851 families, 15.7 percent are low-, 19.0 percent moderate-, 21.6 percent middle-, and 43.8 percent are upper-income.
  - As of April 1, 2023, the bank operated one branch, representing 0.2 percent of its total branches.
  - As of June 30, 2022, Comerica held \$45.1 million in deposits, representing a market share of 3.1 percent and 0.1 percent of the bank's total deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix E contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 38 discusses conclusions regarding the bank's performance.

**Table 38**

| <b>Assessment Area</b>            | <b>Lending Test</b> | <b>Investment Test</b> | <b>Service Test</b> |
|-----------------------------------|---------------------|------------------------|---------------------|
| Lenawee County Nonmetropolitan AA | Below               | Below                  | Below               |

The institution's lending, investment, and service performance in the AA is below Comerica's lending, investment, and service performance in the state; however, it does not impact the assessed rating.

## STATE OF TEXAS

### CRA RATING FOR TEXAS:

|                               |                    |
|-------------------------------|--------------------|
| The Lending Test is Rated:    | <b>Outstanding</b> |
| The Investment Test is Rated: | Outstanding        |
| The Service Test is Rated:    | Outstanding        |

Major factors supporting the institution's rating include:

- Lending activity reflects excellent responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses and farms of different sizes is good.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services that do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

### SCOPE OF THE EVALUATION

The scope of the review for the state of Texas is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

The two of the five AAs in the state of Texas were reviewed using full-scope procedures.

- Dallas-Fort Worth Metropolitan AA
- San Antonio Metropolitan AA

The remaining three AAs received limited-scope reviews.

- Austin Metropolitan AA
- Houston Metropolitan AA
- Bank of the Hills Nonmetropolitan AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA last received a full-scope review. Overall, approximately 45.5 percent of lending activity (by number of loans), 57.0 percent of deposits, and 53.0 percent of total branches within Texas were evaluated through the full-scope reviews. The bank's performance in the Dallas Fort Worth Metropolitan AA was given greater consideration as it represents the majority of Comerica's activity in the state and is a strategic focus of the institution.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS**

The bank delineates five of its 27 AAs and operates 115 of its 409 branches in the state of Texas. As of June 30, 2022, Comerica had \$12.8 billion in deposits in the state, representing 16.6 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 0.9 percent and ranked 13<sup>th</sup> out of 247 FDIC-insured financial institutions across the state.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the state of Texas is Outstanding. The Lending Test performance in the Dallas-Fort Worth Metropolitan AA is excellent, which is consistent with the overall state rating, while the bank's performance in the San Antonio Metropolitan AA is considered good. Overall, Comerica's performance in the AAs receiving limited-scope reviews supports the rating for the state.

### **Lending Activity**

Comerica's lending levels reflect excellent responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs through participation in government-guaranteed programs, small business initiatives, and affordable housing projects.

As outlined in Table 39, this evaluation considered 12,153 loans totaling \$2.7 billion extended between January 1, 2020 and December 31, 2022. The loan products and origination volumes are consistent with the credit needs of the Texas AAs and the bank's business strategy. The number of small business and HMDA loans extended by the bank was compared against the number of loans originated by aggregate lenders. Comerica ranked 51<sup>st</sup> out of 239 CRA reporters and 88<sup>th</sup> of 978 HMDA reporters in its Texas AAs.

**Table 39**

| <b>Summary of Lending Activity – January 1, 2020 through December 31, 2022<br/>Texas Assessment Areas</b> |               |              |                  |              |
|-----------------------------------------------------------------------------------------------------------|---------------|--------------|------------------|--------------|
| <b>Loan Type</b>                                                                                          | <b>#</b>      | <b>%</b>     | <b>\$000s</b>    | <b>%</b>     |
| Home Purchase                                                                                             | 228           | 1.9          | 78,901           | 2.9          |
| Refinancing                                                                                               | 1,674         | 13.8         | 411,100          | 15.3         |
| Home Improvement                                                                                          | 853           | 7.0          | 127,719          | 4.8          |
| Multifamily                                                                                               | 10            | 0.1          | 285,399          | 10.6         |
| Other Purpose Lines of Credit                                                                             | 900           | 7.4          | 160,585          | 6.0          |
| Other Purpose Closed/Exempt                                                                               | 38            | 0.3          | 31,915           | 1.2          |
| <b>Total HMDA-Related</b>                                                                                 | <b>3,703</b>  | <b>30.5</b>  | <b>1,095,619</b> | <b>40.8</b>  |
| <b>Total Small Business</b>                                                                               | <b>8,324</b>  | <b>68.5</b>  | <b>1,582,239</b> | <b>59.0</b>  |
| <b>Total Small Farm</b>                                                                                   | <b>126</b>    | <b>1.0</b>   | <b>5,736</b>     | <b>0.2</b>   |
| <b>TOTAL LOANS</b>                                                                                        | <b>12,153</b> | <b>100.0</b> | <b>2,683,594</b> | <b>100.0</b> |

### Geographic Distribution of Loans

The overall geographic distribution of lending reflects excellent penetration throughout the bank's Texas AAs. This performance is consistent across Comerica's Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs.

### Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different revenue sizes. This performance is consistent across the bank's Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### Community Development Lending

Comerica is a leader in making CD loans in the state of Texas. As reflected in Table 40, the bank originated 309 CD loans totaling approximately \$1.0 billion within the state, which comprises 22.9 percent of overall bank-wide CD loan volume by number and 18.8 percent by dollar amount. The level of CD lending is excellent in the Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs.

The bank's Texas CD loans increased notably since the previous evaluation. While the number of qualified loans decreased by 24.8 percent, the dollar amount increased by 45.0 percent since the prior evaluation. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which made up approximately 40.9 percent of the bank's CD loans at the previous evaluation.

CD loans originated by the bank during the evaluation period were extended for a variety of purposes, as noted in Table 40. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 40**

| <b>Community Development Lending<br/>Texas Assessment Areas</b> |            |                  |
|-----------------------------------------------------------------|------------|------------------|
| <b>Purpose</b>                                                  | <b>#</b>   | <b>\$(000s)</b>  |
| Affordable Housing                                              | 5          | 90,795           |
| Community Services                                              | 22         | 21,247           |
| Economic Development                                            | 194        | 713,873          |
| Revitalization and Stabilization                                | 88         | 178,264          |
| <b>Total</b>                                                    | <b>309</b> | <b>1,004,179</b> |

**INVESTMENT TEST**

The bank's performance under the Investment Test in the state of Texas is Outstanding. The Investment Test conclusions in the Dallas-Fort Worth Metropolitan AA is considered excellent and consistent with the overall state rating. The bank's performance under the Investment Test in the San Antonio Metropolitan AA is adequate. Greater weight was given to the Dallas-Fort Worth Metropolitan AA, as 48.0 percent by number volume and 47.4 percent by dollar amount of the bank's CD investments in the state of Texas occurred in that AA. Conversely, the CD investments in the San Antonio Metropolitan AA represented 5.1 percent by number volume and 15.8 percent by dollar amount of the total CD investments in the state of Texas. Generally, the bank's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Texas.

Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, often in a leadership position. The bank's occasional use of innovative and/or complex investments exhibits good responsiveness to the credit and CD needs of its AAs. Specific details regarding CD qualified investments and donations within the bank's Texas AAs can be found in the Conclusions with Respect to Performance Tests section for each AA.

In addition to the activity within its delineated AAs, the bank also made five qualified CD investments in the broader statewide region. These investments totaled \$6.6 million, including a \$4 million investment in a Small Business Investment Company that promotes economic development across the region through the financing of small businesses. Comerica also made a sizeable donation in a minority-owned financial institution that serves LMI geographies within the state.

**Table 41**

| <b>Investments, Grants, and Donations<br/>Texas Assessment Areas</b> |                                                 |                 |                                            |                 |                  |                 |              |                 |
|----------------------------------------------------------------------|-------------------------------------------------|-----------------|--------------------------------------------|-----------------|------------------|-----------------|--------------|-----------------|
| <b>Community Development<br/>Purpose</b>                             | <b>Prior Period<br/>Investments<sup>1</sup></b> |                 | <b>Current<br/>Investments<sup>2</sup></b> |                 | <b>Donations</b> |                 | <b>Total</b> |                 |
|                                                                      | <b>#</b>                                        | <b>\$(000s)</b> | <b>#</b>                                   | <b>\$(000s)</b> | <b>#</b>         | <b>\$(000s)</b> | <b>#</b>     | <b>\$(000s)</b> |
| Affordable Housing                                                   | 48                                              | 47,738          | 13                                         | 67,325          | 19               | 215             | 80           | 115,278         |
| Community Services                                                   | 0                                               | 0               | 0                                          | 0               | 257              | 3,619           | 257          | 3,619           |
| Economic Development                                                 | 4                                               | 4,176           | 11                                         | 20,454          | 37               | 862             | 52           | 25,492          |
| Revitalization and Stabilization                                     | 0                                               | 0               | 0                                          | 0               | 3                | 30              | 3            | 30              |
| <b>Total</b>                                                         | <b>52</b>                                       | <b>51,914</b>   | <b>24</b>                                  | <b>87,779</b>   | <b>316</b>       | <b>4,726</b>    | <b>392</b>   | <b>144,419</b>  |

<sup>1</sup> Book value of investment<sup>2</sup> Original market value of investment

**SERVICE TEST**

The bank's performance under the Service Test in the state of Texas is Outstanding. The Service Test conclusions in the Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs are considered excellent and consistent with the overall state rating. Generally, Comerica's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Texas.

**Retail Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Of Comerica's 115 full-service branches and 158 full-service ATMs in the state of Texas, 34 branches and 39 ATMs are located in LMI tracts. Refer to Table 42 for the distribution of Texas branches and full-service ATMs by income level of geographies.

The bank's delivery systems in the state of Texas are accessible to the geographies and individuals of different income levels in Comerica's AAs. The bank's record of opening or closing branches in the state has not adversely affected the accessibility of its delivery systems. Banking services and hours of operations do not vary in a way that inconveniences the state, particularly LMI geographies or LMI individuals. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

**Table 42**

| <b>Branch and Full-Service ATM Locations<br/>Texas Assessment Areas</b> |                             |                            |                            |                 |            |                          |            |
|-------------------------------------------------------------------------|-----------------------------|----------------------------|----------------------------|-----------------|------------|--------------------------|------------|
| <b>Tract<br/>Income</b>                                                 | <b>% of<br/>Geographies</b> | <b>% of<br/>Households</b> | <b>% of<br/>Businesses</b> | <b>Branches</b> |            | <b>Full-Service ATMs</b> |            |
|                                                                         |                             |                            |                            | <b>#</b>        | <b>%</b>   | <b>#</b>                 | <b>%</b>   |
| Low                                                                     | 10.8                        | 9.3                        | 6.5                        | 10              | 8.7        | 14                       | 8.9        |
| Moderate                                                                | 26.1                        | 25.0                       | 19.8                       | 24              | 20.9       | 25                       | 15.8       |
| Middle                                                                  | 28.1                        | 30.0                       | 28.0                       | 30              | 26.1       | 45                       | 28.5       |
| Upper                                                                   | 32.6                        | 34.5                       | 44.3                       | 47              | 40.9       | 70                       | 44.3       |
| Unknown                                                                 | 2.4                         | 1.2                        | 1.4                        | 4               | 3.5        | 4                        | 2.5        |
| <b>Total</b>                                                            | <b>100</b>                  | <b>100</b>                 | <b>100</b>                 | <b>115</b>      | <b>100</b> | <b>158</b>               | <b>100</b> |

**Community Development Services**

The bank is a leader in providing CD services in the state of Texas. While the San Antonio Metropolitan AA is adequate in providing CD services, greater weight was given to the Dallas-Fort Worth Metropolitan AA. Bank representatives provided 1,778 services, totaling 5,617 hours, to 248 organizations within its Texas AAs. The bank's directors, officers, and personnel are involved with numerous organizations that extend CD services to LMI individuals and/or geographies. The bank significantly increased the hours and more than doubled the number of organizations served since the previous evaluation. The bank's significant efforts to promote CD are noted through board participation, financial literacy, and entrepreneurship training. Details of the bank's explicit CD services AA can be found in the Conclusions with Respect to Performance Tests section for each AA.

**DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA**

- The Dallas-Fort Worth Metropolitan AA consists of the entirety of six of the eleven counties that make up the Dallas-Fort Worth-Arlington, TX MSA: Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is made up of 1,572 census tracts, of which 9.5 percent are designated as low-income, 26.0 percent as moderate-income, 28.9 percent as middle-income, 34.0 percent as upper-income, and the remaining 1.5 percent as unknown-income.
- The 2020 U.S. Census added 355 new census tracts within the AA, resulting in an increase of 29.2 percent. The number of geographies designated as LMI increased by 14.5 percent, with low-income census tracts decreasing by 9.1 percent and moderate-income tracts increasing by 30.7 percent.
- The bank operates 55 full-service branches in the AA, including seven branches in low-income, eight in moderate-income, 19 branches in middle-income, and 21 branches in upper-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 0.8 percent market share, ranking 11<sup>th</sup> out of 160 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 72<sup>nd</sup> out of 1,064 HMDA reporters in the AA with 571 HMDA originations and purchases, and 23<sup>rd</sup> out of 309 CRA reporters with 740 CRA small business loans.
- Community contacts indicated a significant need for affordable housing, access to homeownership and credit for LMI individuals, as well as buydown interest rate programs and small businesses lending.

**Table 43**

| <b>Population Change</b>                                                                                    |                        |                        |                          |
|-------------------------------------------------------------------------------------------------------------|------------------------|------------------------|--------------------------|
| <b>Assessment Area: Dallas-Fort Worth Metropolitan</b>                                                      |                        |                        |                          |
| <b>Area</b>                                                                                                 | <b>2015 Population</b> | <b>2020 Population</b> | <b>Percentage Change</b> |
| Dallas-Fort Worth Metropolitan AA                                                                           | 6,236,189              | 6,995,340              | 12.2                     |
| Collin County, TX                                                                                           | 862,215                | 1,064,465              | 23.5                     |
| Dallas County, TX                                                                                           | 2,485,003              | 2,613,539              | 5.2                      |
| Denton County, TX                                                                                           | 731,851                | 906,422                | 23.9                     |
| Ellis County, TX                                                                                            | 157,058                | 192,455                | 22.5                     |
| Rockwall County, TX                                                                                         | 85,536                 | 107,819                | 26.1                     |
| Tarrant County, TX                                                                                          | 1,914,526              | 2,110,640              | 10.2                     |
| Dallas-Plano-Irving, TX MD                                                                                  | 4,519,004              | 5,129,966              | 13.5                     |
| Fort Worth-Arlington-Grapevine, TX MD                                                                       | 2,252,637              | 2,507,421              | 11.3                     |
| Texas                                                                                                       | 26,538,614             | 29,145,505             | 9.8                      |
| Source: 2020 U.S. Census Bureau Decennial Census<br>2011-2015 U.S. Census Bureau: American Community Survey |                        |                        |                          |



- Population trends between 2015 and 2020 reflect significant growth throughout the AA. Four of the six counties reporting population growth exhibit increases of 20 percent or more. With the exception of Dallas County, the population growth in every AA county exceeded the statewide and national growth rates, at 9.8 percent and 1.6 percent, respectively.
- A community contact noted that significant population growth can be attributed to employment opportunities offered by the nearly 24 Fortune 500 companies headquartered in the AA. Some of these companies include American Airlines, Southwest Airlines, AT&T, Texas Instruments, and ExxonMobil.
- According to U.S. Census Bureau estimates, four of the 15 cities with the largest increase in population between July 1, 2020, and July 1, 2021, are located inside of the AA.

**Table 44**

| <b>Median Family Income Change</b>                                                          |                                  |                                  |                          |
|---------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|--------------------------|
| <b>Assessment Area: Dallas-Fort Worth Metropolitan</b>                                      |                                  |                                  |                          |
| <b>Area</b>                                                                                 | <b>2015 Median Family Income</b> | <b>2020 Median Family Income</b> | <b>Percentage Change</b> |
| Dallas-Fort Worth Metropolitan AA                                                           | 77,599                           | 86,033                           | 10.9                     |
| Collin County, TX                                                                           | 110,174                          | 118,341                          | 7.4                      |
| Dallas County, TX                                                                           | 61,072                           | 69,689                           | 14.1                     |
| Denton County, TX                                                                           | 99,628                           | 111,436                          | 11.9                     |
| Ellis County, TX                                                                            | 78,280                           | 89,870                           | 14.8                     |
| Rockwall County, TX                                                                         | 104,958                          | 113,658                          | 8.3                      |
| Tarrant County, TX                                                                          | 76,367                           | 82,856                           | 8.5                      |
| Dallas-Plano-Irving, TX MD                                                                  | 77,736                           | 88,315                           | 13.6                     |
| Fort Worth-Arlington-Grapevine, TX MD                                                       | 75,758                           | 82,649                           | 9.1                      |
| Texas                                                                                       | 68,523                           | 76,073                           | 11.0                     |
| Source: 2011-2015 U.S. Census Bureau: American Community Survey                             |                                  |                                  |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                                     |                                  |                                  |                          |
| Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars. |                                  |                                  |                          |

- The AA MFI grew at a rate comparable to the state MFI, with half of the AA counties reporting 2020 MFIs greater than \$100,000.
- Collin County has the lowest MFI growth between 2015 and 2020; however, it has maintained the highest 2020 MFI at \$118,341.
- According to the FFIEC Census data, 8.2 percent of AA families live below the poverty level. Dallas County has the highest rate of families living below the poverty level, at 11.4 percent, which slightly exceeds the statewide rate, at 10.9 percent.

**Table 45**

| <b>Housing Cost Burden</b><br><b>Assessment Area: Dallas-Fort Worth Metropolitan</b>                                                                                                                                    |                       |                 |             |                      |                 |            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area                                                                                                                                                                                                                    | Cost Burden - Renters |                 |             | Cost Burden – Owners |                 |            |
|                                                                                                                                                                                                                         | Low Income            | Moderate Income | All Renters | Low Income           | Moderate Income | All Owners |
| Dallas-Fort Worth Metropolitan AA                                                                                                                                                                                       | 80.5                  | 44.2            | 42.2        | 63.8                 | 35.8            | 20.2       |
| Collin County, TX                                                                                                                                                                                                       | 83.4                  | 65.5            | 40.2        | 69.7                 | 51.4            | 19.3       |
| Dallas County, TX                                                                                                                                                                                                       | 78.9                  | 37.3            | 42.4        | 61.4                 | 30.4            | 22.6       |
| Denton County, TX                                                                                                                                                                                                       | 84.3                  | 52.5            | 41.3        | 71.5                 | 46.9            | 19.2       |
| Ellis County, TX                                                                                                                                                                                                        | 79.2                  | 35.9            | 42.3        | 55.6                 | 25.2            | 15.5       |
| Rockwall County, TX                                                                                                                                                                                                     | 80.8                  | 61.0            | 39.5        | 70.7                 | 44.3            | 18.9       |
| Tarrant County, TX                                                                                                                                                                                                      | 81.5                  | 43.9            | 43.2        | 63.9                 | 34.2            | 19.2       |
| Dallas-Plano-Irving, TX MD                                                                                                                                                                                              | 79.9                  | 43.8            | 41.9        | 63.1                 | 35.9            | 20.7       |
| Fort Worth-Arlington-Grapevine, TX MD                                                                                                                                                                                   | 80.7                  | 42.5            | 42.7        | 62.1                 | 32.3            | 18.9       |
| Texas                                                                                                                                                                                                                   | 77.4                  | 42.4            | 42.4        | 57.5                 | 30.9            | 19.2       |
| <i>Cost burden is housing cost that equals 30 percent or more of household income.</i><br><i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i> |                       |                 |             |                      |                 |            |

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- Overall, the cost burden for homeowners and renters in the AA is greater than the housing cost burden for homeowners and renters statewide.
- The AA median housing value is \$241,896 while the statewide median housing value is \$187,200. Moreover, the AA median age of housing stock is 38 years, with Rockwall County reporting it at 18 years. In comparison, the state of Texas' median age of housing stock is 33 years.
- A community contact reported a shortage of affordable housing in the AA, noting that housing affordability is a significant issue impacting LMI households.

**Table 46**

| <b>Unemployment Rates</b><br><b>Assessment Area: Dallas-Fort Worth Metropolitan</b> |      |      |      |      |      |
|-------------------------------------------------------------------------------------|------|------|------|------|------|
| Region                                                                              | 2018 | 2019 | 2020 | 2021 | 2022 |
| Dallas-Fort Worth Metropolitan AA                                                   | 3.6  | 3.3  | 7.2  | 5.1  | 3.5  |
| Collin County, TX                                                                   | 3.4  | 3.1  | 6.3  | 4.3  | 3.2  |
| Dallas County, TX                                                                   | 3.8  | 3.5  | 7.8  | 5.6  | 3.7  |
| Denton County, TX                                                                   | 3.2  | 3.0  | 6.4  | 4.4  | 3.2  |
| Ellis County, TX                                                                    | 3.3  | 3.1  | 6.0  | 4.5  | 3.5  |
| Rockwall County, TX                                                                 | 3.3  | 3.1  | 5.9  | 4.3  | 3.3  |
| Tarrant County, TX                                                                  | 3.5  | 3.3  | 7.4  | 5.3  | 3.6  |
| Dallas-Plano-Irving, TX MD                                                          | 3.6  | 3.3  | 7.0  | 5.0  | 3.5  |
| Fort Worth-Arlington-Grapevine, TX MD                                               | 3.5  | 3.3  | 7.2  | 5.2  | 3.6  |
| Texas                                                                               | 3.9  | 3.5  | 7.7  | 5.7  | 3.9  |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>       |      |      |      |      |      |

- Unemployment rates for the AA and its counties between 2018 and 2022 are comparable to the statewide rate.
- Unemployment rates almost doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay at home and social distancing

orders. The impact of the COVID-19 pandemic in the Dallas and Tarrant counties' unemployment rate was significant, driving the AA unemployment rate in 2020. In 2022, the AA and statewide unemployment rates stabilized to pre-pandemic levels.

- Major employment industries within the AA include healthcare and social assistance, accommodation and food services, and retail trade.

Table 47 details selected characteristics of the AA.

**Table 47**

| 2022 Combined Demographics                                     |                           |                       |                                    |              |                                           |              |                           |              |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|-------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Dallas-Fort Worth Metropolitan                |                           |                       |                                    |              |                                           |              |                           |              |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families |              | Families by Family Income |              |
|                                                                | #                         | %                     | #                                  | %            | #                                         | %            | #                         | %            |
| Low                                                            | 150                       | 9.5                   | 133,215                            | 8.0          | 34,671                                    | 26.0         | 364,225                   | 22.0         |
| Moderate                                                       | 409                       | 26.0                  | 393,808                            | 23.8         | 54,122                                    | 13.7         | 285,539                   | 17.2         |
| Middle                                                         | 454                       | 28.9                  | 503,984                            | 30.4         | 29,654                                    | 5.9          | 318,348                   | 19.2         |
| Upper                                                          | 535                       | 34.0                  | 618,103                            | 37.3         | 16,723                                    | 2.7          | 689,234                   | 41.6         |
| Unknown                                                        | 24                        | 1.5                   | 8,236                              | 0.5          | 1,272                                     | 15.4         | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>1,572</b>              | <b>100.0</b>          | <b>1,657,346</b>                   | <b>100.0</b> | <b>136,442</b>                            | <b>8.2</b>   | <b>1,657,346</b>          | <b>100.0</b> |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                           |              |                           |              |
|                                                                |                           | Owner-occupied        |                                    |              | Rental                                    |              | Vacant                    |              |
|                                                                |                           | #                     | % by                               | % by         | #                                         | % by unit    | #                         | % by unit    |
| Low                                                            | 249,345                   | 62,642                | 4.4                                | 25.1         | 159,061                                   | 63.8         | 27,642                    | 11.1         |
| Moderate                                                       | 650,771                   | 276,691               | 19.6                               | 42.5         | 320,530                                   | 49.3         | 53,550                    | 8.2          |
| Middle                                                         | 793,625                   | 447,020               | 31.7                               | 56.3         | 295,959                                   | 37.3         | 50,646                    | 6.4          |
| Upper                                                          | 884,505                   | 618,809               | 43.9                               | 70.0         | 215,382                                   | 24.4         | 50,314                    | 5.7          |
| Unknown                                                        | 23,757                    | 5,212                 | 0.4                                | 21.9         | 15,068                                    | 63.4         | 3,477                     | 14.6         |
| <b>Total AA</b>                                                | <b>2,602,003</b>          | <b>1,410,374</b>      | <b>100.0</b>                       | <b>54.2</b>  | <b>1,006,000</b>                          | <b>38.7</b>  | <b>185,629</b>            | <b>7.1</b>   |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                           |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                          |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                         | %            | #                         | %            |
| Low                                                            | 21,228                    | 5.4                   | 19,487                             | 5.3          | 1,588                                     | 6.5          | 153                       | 3.1          |
| Moderate                                                       | 76,498                    | 19.4                  | 70,112                             | 19.2         | 5,717                                     | 23.4         | 669                       | 13.4         |
| Middle                                                         | 120,385                   | 30.5                  | 111,662                            | 30.5         | 7,492                                     | 30.6         | 1,231                     | 24.7         |
| Upper                                                          | 173,412                   | 43.9                  | 161,248                            | 44.1         | 9,275                                     | 37.9         | 2,889                     | 58.1         |
| Unknown                                                        | 3,493                     | 0.9                   | 3,062                              | 0.8          | 397                                       | 1.6          | 34                        | 0.7          |
| <b>Total AA</b>                                                | <b>395,016</b>            | <b>100.0</b>          | <b>365,571</b>                     | <b>100.0</b> | <b>24,469</b>                             | <b>100.0</b> | <b>4,976</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                         |                           |                       |                                    | <b>92.5</b>  |                                           | <b>6.2</b>   |                           | <b>1.3</b>   |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                           |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                          |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                         | %            | #                         | %            |
| Low                                                            | 78                        | 2.5                   | 77                                 | 2.5          | 1                                         | 2.9          | 0                         | 0.0          |
| Moderate                                                       | 385                       | 12.5                  | 379                                | 12.5         | 6                                         | 17.1         | 0                         | 0.0          |
| Middle                                                         | 1,038                     | 33.8                  | 1,029                              | 33.9         | 9                                         | 25.7         | 0                         | 0.0          |
| Upper                                                          | 1,557                     | 50.6                  | 1,536                              | 50.6         | 19                                        | 54.3         | 2                         | 100.0        |
| Unknown                                                        | 17                        | 0.6                   | 17                                 | 0.6          | 0                                         | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>3,075</b>              | <b>100.0</b>          | <b>3,038</b>                       | <b>100.0</b> | <b>35</b>                                 | <b>100.0</b> | <b>2</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                              |                           |                       |                                    | <b>98.8</b>  |                                           | <b>1.1</b>   |                           | <b>0.1</b>   |
| Source: 2022 FFIEC Census Data                                 |                           |                       |                                    |              |                                           |              |                           |              |
| 2022 Dun & Bradstreet Data                                     |                           |                       |                                    |              |                                           |              |                           |              |
| 2016-2020 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |              |                                           |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                           |              |                           |              |



## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Comerica's Lending Test performance in the AA is excellent. The bank's small business lending generally carried more weight as this product comprised the largest volume of lending in the AA. Additionally, a separate evaluation of multifamily loans, other purpose closed/exempt, and loan purpose not applicable was not performed due to insufficient volume of originations during the review period to conduct a meaningful analysis.

Details of the bank's 2020 mortgage and small business lending and corresponding aggregate data can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve AA credit needs, including LMI borrowers. The bank originated 1,808 home mortgage and 3,824 small business loans in the AA between January 1, 2020, and December 31, 2022. Comerica sustained the volume of home mortgage lending between 2020 and 2022; however, the volume of small business lending significantly decreased year after year. The reduction in small business lending is primarily attributed to the cessation of the SBA's PPP in May 2021 and rising interest rates in 2022. It is noteworthy that the level of home mortgage lending has not been adversely impacted by the interest rate hikes. This level of lending reflects favorably on the bank as it aligns with the bank's strategic focus on small business lending.

### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects excellent penetration throughout the AA. Comerica's home mortgage and small business lending reflects excellent penetration among geographies of different income levels, especially LMI geographies. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about Comerica's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects excellent penetration throughout the AA. The bank's 2021 and 2022 distribution of home mortgage loans by number volume among low-income census tracts is comparable to aggregate data and demographic figure. The penetration in moderate-income census tracts exceeds aggregate data in 2021 and is comparable 2022. In 2022, Comerica's home mortgage lending to LMI census tracts by dollar amount is comparable aggregate and slightly below the demographic figure.

The bank's 2020 loan distribution in LMI geographies is comparable with 2021 and 2022.

### *Home Purchase Lending*

The geographic distribution of home purchase lending is excellent. The distribution of 2022 home purchase loans among low-income census tracts doubles the aggregate data and exceeds the demographic figure, which is noteworthy given the decrease of low-income geographies in the AA. While Comerica did not extend any home purchase loans in low-income geographies in 2021, its 2020 and 2021 lending performance is comparable to aggregate data.

The distribution of the bank's home purchase loans among moderate-income census tracts in 2021 and 2022 also exceeds aggregate data, though Comerica's lending is comparable to aggregate lending in 2020. The bank's performance in 2020, 2021, and 2022 is below the demographic figure, which does not adversely impact the bank's overall performance given that aggregate data serves as a better proxy for loan demand.

### *Home Refinance Lending*

The geographic distribution of home refinance lending is excellent. The distribution of 2020 and 2021 home refinance loans among low-income census tracts exceeds aggregate data and the demographic figure, though it is slightly lower in 2022. The bank's lending in moderate-income census tracts significantly exceeds aggregate data and is comparable to the demographic figure.

The bank's lending performance in 2020 reflected penetration levels consistent with 2021 and 2022 performance, with a distribution of loans in LMI census tracts above aggregate data.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is excellent. The bank's 2021 and 2022 distribution of home improvement loans among low-income census tracts exceeds aggregate data and the demographic figure. However, the bank's 2021 and 2022 home improvement lending in moderate-income tracts significantly exceeds aggregate data but is slightly below the demographic figure.

Lending in LMI census tracts increased since the prior evaluation. The bank's 2020 lending performance in LMI geographies is consistent with its 2021 and 2022 loan distribution, with Comerica's performance in LMI census tracts exceeding aggregate data.

### *Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is excellent. The bank's 2020 and 2021 lending performance in low-income census tracts exceeds aggregate lenders and is comparable to the percentage of owner-occupied units in these tracts. The 2022 loan distribution among low-income census tracts is comparable to aggregate data and slightly below the demographic figure. Aggregate data serves as a better proxy for loan demand than the demographic figure.

**Table 48A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Dallas-Fort Worth Metropolitan                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.9   | 0       | 0.0   | 2.5   | 3    | 9.4   | 4.3   | 498     | 3.6   | 2.0   | 4.4                          |
| Moderate                                                                         | 6                                | 16.7  | 13.4  | 1,296   | 11.6  | 9.4   | 6    | 18.8  | 14.0  | 1,038   | 7.4   | 9.2   | 19.6                         |
| Middle                                                                           | 5                                | 13.9  | 33.8  | 1,125   | 10.1  | 28.2  | 6    | 18.8  | 34.9  | 1,573   | 11.3  | 29.3  | 31.7                         |
| Upper                                                                            | 25                               | 69.4  | 48.7  | 8,758   | 78.3  | 59.6  | 17   | 53.1  | 46.3  | 10,854  | 77.7  | 59.0  | 43.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0.4                          |
| Total                                                                            | 36                               | 100.0 | 100.0 | 11,179  | 100.0 | 100.0 | 32   | 100.0 | 100.0 | 13,963  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 15                               | 5.5   | 2.0   | 2,507   | 3.4   | 1.4   | 4    | 1.9   | 2.6   | 528     | 0.9   | 1.5   | 4.4                          |
| Moderate                                                                         | 53                               | 19.4  | 9.7   | 7,966   | 10.7  | 6.5   | 38   | 18.2  | 14.0  | 6,637   | 11.6  | 8.9   | 19.6                         |
| Middle                                                                           | 61                               | 22.3  | 28.0  | 10,655  | 14.4  | 22.1  | 49   | 23.4  | 33.4  | 11,676  | 20.4  | 26.1  | 31.7                         |
| Upper                                                                            | 144                              | 52.7  | 60.3  | 53,112  | 71.5  | 69.6  | 118  | 56.5  | 49.6  | 38,437  | 67.1  | 63.1  | 43.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0.4                          |
| Total                                                                            | 273                              | 100.0 | 100.0 | 74,240  | 100.0 | 100.0 | 209  | 100.0 | 100.0 | 57,278  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 7                                | 4.8   | 2.1   | 731     | 3.1   | 1.3   | 9    | 5.3   | 1.8   | 777     | 3.1   | 1.2   | 4.4                          |
| Moderate                                                                         | 22                               | 15.1  | 8.8   | 2,268   | 9.7   | 6.2   | 28   | 16.6  | 9.2   | 3,176   | 12.7  | 6.7   | 19.6                         |
| Middle                                                                           | 30                               | 20.5  | 22.5  | 3,794   | 16.2  | 17.5  | 38   | 22.5  | 24.2  | 5,285   | 21.1  | 19.1  | 31.7                         |
| Upper                                                                            | 86                               | 58.9  | 66.4  | 16,487  | 70.5  | 74.9  | 92   | 54.4  | 64.4  | 15,110  | 60.3  | 72.6  | 43.9                         |
| Unknown                                                                          | 1                                | 0.7   | 0.1   | 101     | 0.4   | 0.1   | 2    | 1.2   | 0.4   | 690     | 2.8   | 0.4   | 0.4                          |
| Total                                                                            | 146                              | 100.0 | 100.0 | 23,381  | 100.0 | 100.0 | 169  | 100.0 | 100.0 | 25,038  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 23.7  | 0       | 0.0   | 17.8  | 0    | 0.0   | 16.8  | 0       | 0.0   | 9.7   |                              |
| Moderate                                                                         | 0                                | 0.0   | 32.6  | 0       | 0.0   | 24.0  | 0    | 0.0   | 35.3  | 0       | 0.0   | 25.8  |                              |
| Middle                                                                           | 0                                | 0.0   | 26.0  | 0       | 0.0   | 30.5  | 0    | 0.0   | 23.6  | 0       | 0.0   | 33.5  |                              |
| Upper                                                                            | 1                                | 100.0 | 17.3  | 13,839  | 100.0 | 26.9  | 2    | 100.0 | 22.3  | 104,000 | 100.0 | 29.1  |                              |
| Unknown                                                                          | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.8   | 0    | 0.0   | 1.9   | 0       | 0.0   | 1.8   |                              |
| Total                                                                            | 1                                | 100.0 | 100.0 | 13,839  | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 104,000 | 100.0 | 100.0 |                              |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 26                               | 4.5   | 2.9   | 3,690   | 2.4   | 3.0   | 18   | 3.2   | 3.8   | 2,010   | 0.9   | 3.0   |                              |
| Moderate                                                                         | 101                              | 17.6  | 11.5  | 14,105  | 9.3   | 9.0   | 92   | 16.1  | 13.9  | 13,500  | 5.8   | 11.3  |                              |
| Middle                                                                           | 115                              | 20.0  | 30.5  | 17,661  | 11.6  | 25.4  | 136  | 23.8  | 33.8  | 24,747  | 10.6  | 28.9  |                              |
| Upper                                                                            | 332                              | 57.7  | 54.9  | 116,446 | 76.6  | 62.4  | 323  | 56.6  | 48.0  | 192,044 | 82.4  | 56.0  |                              |
| Unknown                                                                          | 1                                | 0.2   | 0.2   | 101     | 0.1   | 0.2   | 2    | 0.4   | 0.5   | 690     | 0.3   | 0.7   |                              |
| Total                                                                            | 575                              | 100.0 | 100.0 | 152,003 | 100.0 | 100.0 | 571  | 100.0 | 100.0 | 232,991 | 100.0 | 100.0 |                              |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

**Table 48B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Dallas-Fort Worth Metropolitan                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 4                                | 3.5   | 1.6   | 452     | 1.9   | 0.9   | 1    | 0.7   | 0.8   | 50      | 0.2   | 0.4   | 4.4                          |
| Moderate                                                                         | 20                               | 17.5  | 8.2   | 2,575   | 10.9  | 5.1   | 17   | 11.5  | 6.5   | 2,180   | 7.7   | 4.1   | 19.6                         |
| Middle                                                                           | 17                               | 14.9  | 17.8  | 1,693   | 7.2   | 10.3  | 40   | 27.0  | 22.6  | 5,728   | 20.1  | 14.8  | 31.7                         |
| Upper                                                                            | 73                               | 64.0  | 72.2  | 18,927  | 80.0  | 83.6  | 90   | 60.8  | 69.6  | 20,515  | 72.1  | 80.3  | 43.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 0.4                          |
| Total                                                                            | 114                              | 100.0 | 100.0 | 23,647  | 100.0 | 100.0 | 148  | 100.0 | 100.0 | 28,473  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.5   | 0       | 0.0   | 1.0   | 1    | 9.1   | 3.0   | 157     | 3.7   | 1.3   | 4.4                          |
| Moderate                                                                         | 0                                | 0.0   | 13.4  | 0       | 0.0   | 6.1   | 3    | 27.3  | 11.3  | 469     | 11.1  | 5.6   | 19.6                         |
| Middle                                                                           | 2                                | 40.0  | 24.4  | 394     | 6.9   | 13.3  | 3    | 27.3  | 28.2  | 485     | 11.4  | 15.3  | 31.7                         |
| Upper                                                                            | 3                                | 60.0  | 59.4  | 5,323   | 93.1  | 79.2  | 4    | 36.4  | 57.0  | 3,128   | 73.8  | 77.0  | 43.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.8   | 0.4                          |
| Total                                                                            | 5                                | 100.0 | 100.0 | 5,717   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 4,239   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 4.9   | 0       | 0.0   | 3.6   | 0    | 0.0   | 11.4  | 0       | 0.0   | 10.2  | 4.4                          |
| Moderate                                                                         | 0                                | 0.0   | 26.0  | 0       | 0.0   | 24.3  | 0    | 0.0   | 30.4  | 0       | 0.0   | 15.5  | 19.6                         |
| Middle                                                                           | 0                                | 0.0   | 39.0  | 0       | 0.0   | 31.7  | 0    | 0.0   | 38.4  | 0       | 0.0   | 46.4  | 31.7                         |
| Upper                                                                            | 0                                | 0.0   | 30.0  | 0       | 0.0   | 40.3  | 0    | 0.0   | 18.8  | 0       | 0.0   | 21.0  | 43.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 1.0   | 0       | 0.0   | 6.9   | 0.4                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. The bank's distribution of small business loans among LMI census tracts during the review period consistently exceeds aggregate data and the demographic figure. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA given the cessation of the SBA's PPP in 2021 and rising interest rates in 2022.

**Table 49**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Dallas-Fort Worth Metropolitan                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income Level                                                                                                                                                                | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 166                              | 14.1  | 7.2   | 37,819  | 15.7  | 8.4   | 70   | 9.5   | 7.3   | 20,105  | 9.9   | 8.7   | 5.4                      |
| Moderate                                                                                                                                                                                  | 315                              | 26.7  | 18.5  | 74,642  | 31.0  | 21.2  | 192  | 25.9  | 18.8  | 52,492  | 25.9  | 21.1  | 19.4                     |
| Middle                                                                                                                                                                                    | 252                              | 21.4  | 25.3  | 45,017  | 18.7  | 23.7  | 224  | 30.3  | 24.9  | 62,671  | 30.9  | 23.8  | 30.5                     |
| Upper                                                                                                                                                                                     | 418                              | 35.5  | 47.8  | 75,563  | 31.3  | 45.2  | 249  | 33.6  | 47.9  | 65,858  | 32.5  | 44.6  | 43.9                     |
| Unknown                                                                                                                                                                                   | 28                               | 2.4   | 0.6   | 8,054   | 3.3   | 1.3   | 5    | 0.7   | 0.7   | 1,715   | 0.8   | 1.5   | 0.9                      |
| Total                                                                                                                                                                                     | 1,179                            | 100.0 | 100.0 | 241,095 | 100.0 | 100.0 | 740  | 100.0 | 100.0 | 202,841 | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to individuals of different income levels and businesses of revenue different sizes is good. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic characteristics and the performance of aggregate HMDA lenders in the AA. The bank's 2021 and 2022 lending to low-income borrowers significantly exceeds the performance of aggregate lenders. In 2022, lending to moderate-income borrowers also exceeds aggregate lending data, though the bank's performance to moderate-income borrowers decreased.

The shift in performance toward higher income borrowers occurred as interest rates began to rise from historic lows in early 2022, making mortgage loans more expensive and pricing some lower-income borrowers out of the market. However, the bank's lending to low-income borrowers for home refinance loans and other purpose lines of credit was noteworthy, as the bank lent these products at levels above aggregate lenders.

The bank's lending performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is comparable to aggregate data but below the demographic figure.

**Table 50A**

| Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Dallas-Fort Worth Metropolitan                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                           | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                       | 1                                | 2.8   | 2.8   | 174     | 1.6   | 1.3   | 2    | 6.3   | 1.9   | 1,114   | 8.0   | 0.8   | 22.0                              |
| Moderate                                                                                  | 3                                | 8.3   | 14.4  | 886     | 7.9   | 9.7   | 5    | 15.6  | 11.4  | 700     | 5.0   | 6.8   | 17.2                              |
| Middle                                                                                    | 6                                | 16.7  | 19.8  | 1,249   | 11.2  | 17.0  | 3    | 9.4   | 20.2  | 605     | 4.3   | 16.1  | 19.2                              |
| Upper                                                                                     | 17                               | 47.2  | 40.7  | 5,154   | 46.1  | 52.2  | 18   | 56.3  | 43.4  | 9,546   | 68.4  | 52.5  | 41.6                              |
| Unknown                                                                                   | 9                                | 25.0  | 22.3  | 3,716   | 33.2  | 19.8  | 4    | 12.5  | 23.0  | 1,998   | 14.3  | 23.9  | 0.0                               |
| Total                                                                                     | 36                               | 100.0 | 100.0 | 11,179  | 100.0 | 100.0 | 32   | 100.0 | 100.0 | 13,963  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                       | 35                               | 12.8  | 3.3   | 6,575   | 8.9   | 1.6   | 19   | 9.1   | 7.7   | 2,062   | 3.6   | 3.8   | 22.0                              |
| Moderate                                                                                  | 41                               | 15.0  | 11.1  | 6,283   | 8.5   | 6.8   | 40   | 19.1  | 16.7  | 6,660   | 11.6  | 10.6  | 17.2                              |
| Middle                                                                                    | 62                               | 22.7  | 17.5  | 12,276  | 16.5  | 13.6  | 33   | 15.8  | 20.9  | 8,502   | 14.8  | 16.6  | 19.2                              |
| Upper                                                                                     | 115                              | 42.1  | 46.2  | 43,757  | 58.9  | 55.8  | 107  | 51.2  | 41.3  | 34,656  | 60.5  | 54.1  | 41.6                              |
| Unknown                                                                                   | 20                               | 7.3   | 22.0  | 5,349   | 7.2   | 22.1  | 10   | 4.8   | 13.5  | 5,398   | 9.4   | 14.9  | 0.0                               |
| Total                                                                                     | 273                              | 100.0 | 100.0 | 74,240  | 100.0 | 100.0 | 209  | 100.0 | 100.0 | 57,278  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                       | 15                               | 10.3  | 3.8   | 1,345   | 5.8   | 2.1   | 22   | 13.0  | 4.5   | 2,120   | 8.5   | 2.8   | 22.0                              |
| Moderate                                                                                  | 23                               | 15.8  | 8.9   | 2,421   | 10.4  | 6.1   | 27   | 16.0  | 8.6   | 2,889   | 11.5  | 5.3   | 17.2                              |
| Middle                                                                                    | 25                               | 17.1  | 14.8  | 3,887   | 16.6  | 11.7  | 33   | 19.5  | 15.9  | 4,086   | 16.3  | 11.0  | 19.2                              |
| Upper                                                                                     | 75                               | 51.4  | 69.7  | 14,509  | 62.1  | 76.4  | 82   | 48.5  | 68.2  | 15,417  | 61.6  | 77.1  | 41.6                              |
| Unknown                                                                                   | 8                                | 5.5   | 2.7   | 1,219   | 5.2   | 3.8   | 5    | 3.0   | 2.8   | 526     | 2.1   | 3.8   | 0.0                               |
| Total                                                                                     | 146                              | 100.0 | 100.0 | 23,381  | 100.0 | 100.0 | 169  | 100.0 | 100.0 | 25,038  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                       | 67                               | 11.7  | 3.1   | 9,424   | 6.8   | 1.5   | 57   | 10.0  | 3.7   | 6,670   | 5.2   | 1.5   | 22.0                              |
| Moderate                                                                                  | 77                               | 13.4  | 12.4  | 10,901  | 7.9   | 8.2   | 92   | 16.2  | 12.5  | 12,718  | 9.9   | 7.5   | 17.2                              |
| Middle                                                                                    | 113                              | 19.7  | 18.3  | 19,214  | 13.9  | 15.2  | 92   | 16.2  | 19.9  | 18,317  | 14.2  | 15.9  | 19.2                              |
| Upper                                                                                     | 277                              | 48.3  | 43.8  | 87,756  | 63.5  | 54.1  | 299  | 52.5  | 43.7  | 82,245  | 63.8  | 53.4  | 41.6                              |
| Unknown                                                                                   | 40                               | 7.0   | 22.4  | 10,869  | 7.9   | 21.1  | 29   | 5.1   | 20.2  | 9,041   | 7.0   | 21.7  | 0.0                               |
| Total                                                                                     | 574                              | 100.0 | 100.0 | 138,164 | 100.0 | 100.0 | 569  | 100.0 | 100.0 | 128,991 | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table 50B**

| Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level<br>Assessment Area: Dallas-Fort Worth Metropolitan                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 16                               | 14.0  | 5.0   | 1,330   | 5.6   | 2.6   | 12   | 8.1   | 3.4   | 1,056   | 3.7   | 2.1   | 22.0                              |
| Moderate                                                                                                                                                    | 8                                | 7.0   | 9.0   | 880     | 3.7   | 4.5   | 18   | 12.2  | 7.5   | 2,211   | 7.8   | 4.1   | 17.2                              |
| Middle                                                                                                                                                      | 20                               | 17.5  | 12.9  | 1,802   | 7.6   | 7.6   | 20   | 13.5  | 16.2  | 2,576   | 9.0   | 9.9   | 19.2                              |
| Upper                                                                                                                                                       | 67                               | 58.8  | 68.9  | 19,050  | 80.6  | 81.0  | 90   | 60.8  | 67.6  | 21,911  | 77.0  | 79.0  | 41.6                              |
| Unknown                                                                                                                                                     | 3                                | 2.6   | 4.3   | 585     | 2.5   | 4.3   | 8    | 5.4   | 5.3   | 719     | 2.5   | 4.9   | 0.0                               |
| Total                                                                                                                                                       | 114                              | 100.0 | 100.0 | 23,647  | 100.0 | 100.0 | 148  | 100.0 | 100.0 | 28,473  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 6.4   | 0       | 0.0   | 2.3   | 2    | 18.2  | 7.7   | 318     | 7.5   | 3.6   | 22.0                              |
| Moderate                                                                                                                                                    | 2                                | 40.0  | 13.0  | 431     | 7.5   | 5.1   | 2    | 18.2  | 13.3  | 258     | 6.1   | 6.3   | 17.2                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 15.4  | 0       | 0.0   | 7.3   | 3    | 27.3  | 18.0  | 2,548   | 60.1  | 8.7   | 19.2                              |
| Upper                                                                                                                                                       | 3                                | 60.0  | 56.3  | 5,286   | 92.5  | 75.0  | 2    | 18.2  | 55.6  | 715     | 16.9  | 70.3  | 41.6                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 8.9   | 0       | 0.0   | 10.3  | 2    | 18.2  | 5.4   | 400     | 9.4   | 11.1  | 0.0                               |
| Total                                                                                                                                                       | 5                                | 100.0 | 100.0 | 5,717   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 4,239   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.9   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.4   | 22.0                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.7   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 17.2                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 19.2                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.7   | 41.6                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 97.6  | 0       | 0.0   | 98.0  | 0    | 0.0   | 98.4  | 0       | 0.0   | 98.4  | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is adequate. The distribution of 2020 loan originations to businesses with revenues of \$1 million or less is slightly above the performance of aggregate lenders. The percentage of the bank's 2021 and 2022 lending originated to businesses with revenues of \$1 million or less is lower than the percentage reflected in aggregate lending data. However, in 2022 the bank lent a larger percentage of the dollar amount of small business loans to businesses with revenues of \$1 million or less than reflected by aggregate data. This is reflective of the bank's willingness to lend larger sums to small businesses.

**Table 51**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Dallas-Fort Worth Metropolitan                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 474                              | 40.2  | 43.0  | 66,430  | 27.6  | 27.1  | 220  | 29.7  | 37.6  | 40,667  | 20.0  | 24.3  | 92.5                     |
| Over \$1 Million                                                                                                        | 446                              | 37.8  |       | 146,792 | 60.9  |       | 440  | 59.5  |       | 145,379 | 71.7  |       | 6.2                      |
| Revenue Unknown                                                                                                         | 259                              | 22.0  |       | 27,873  | 11.6  |       | 80   | 10.8  |       | 16,795  | 8.3   |       | 1.3                      |
| Total                                                                                                                   | 1,179                            | 100.0 |       | 241,095 | 100.0 |       | 740  | 100.0 |       | 202,841 | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 613                              | 52.0  | 92.5  | 25,825  | 10.7  | 37.2  | 281  | 38.0  | 87.9  | 16,888  | 8.3   | 33.2  |                          |
| \$100,001 - \$250,000                                                                                                   | 279                              | 23.7  | 4.1   | 51,268  | 21.3  | 17.3  | 191  | 25.8  | 6.9   | 37,826  | 18.6  | 19.9  |                          |
| \$250,001 - \$1 Million                                                                                                 | 287                              | 24.3  | 3.4   | 164,002 | 68.0  | 45.5  | 268  | 36.2  | 5.2   | 148,127 | 73.0  | 46.9  |                          |
| Total                                                                                                                   | 1,179                            | 100.0 | 100.0 | 241,095 | 100.0 | 100.0 | 740  | 100.0 | 100.0 | 202,841 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 313                              | 66.0  |       | 12,386  | 18.6  |       | 129  | 58.6  |       | 6,946   | 17.1  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 87                               | 18.4  |       | 15,498  | 23.3  |       | 43   | 19.5  |       | 8,606   | 21.2  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 74                               | 15.6  |       | 38,546  | 58.0  |       | 48   | 21.8  |       | 25,115  | 61.8  |       |                          |
| Total                                                                                                                   | 474                              | 100.0 |       | 66,430  | 100.0 |       | 220  | 100.0 |       | 40,667  | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

## Community Development Lending

Comerica is a leader in making CD loans in the AA. During the review period, the bank originated a total of 168 qualifying CD loans, totaling \$685.5 million, which represents an increase of 69.2 percent since the prior evaluation. This increase is reflective of the bank's strategic focus on identifying and responding to CD opportunities and LMI needs. During the earliest portion of the review period, the bank was heavily involved with the SBA's PPP. When the program ended in May 2021, Comerica remained committed to responding to identify credit and community development needs of small business by engaging in activities that promote economic development through the financing of small businesses in the AA. To that end, the bank dramatically increased its lending in this area, originating 116 loans for a total of \$484.2 million, representing a 38.8 percent increase by number volume and a 127.5 percent by dollar amount. Examples of the bank's CD lending activities that were considered responsive to the AA credit needs include:

- Lines of credit to support ongoing operations of small businesses (e.g. wholesale egg company, wholesale boot company, and a textile manufacturer) that provide permanent employment to LMI individuals.
- A \$27.5 million line of credit to a small business that partners with a local municipality in the AA to develop an industrial building park. The development will promote economic development, by stimulating commerce, creating employment opportunities, and generating tax revenue.



**Table 52**

| <b>Community Development Lending</b>                   |            |                |
|--------------------------------------------------------|------------|----------------|
| <b>Assessment Area: Dallas-Fort Worth Metropolitan</b> |            |                |
| <b>Purpose</b>                                         | <b>#</b>   | <b>\$000s</b>  |
| Affordable Housing                                     | 3          | 71,700         |
| Community Services                                     | 8          | 7,801          |
| Economic Development                                   | 116        | 484,242        |
| Revitalization and Stabilization                       | 41         | 121,785        |
| <b>Total</b>                                           | <b>168</b> | <b>685,528</b> |

**INVESTMENT TEST**

Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. Despite the 25.7 percent decrease in the number of CD investments and grants since the previous evaluation, the dollar amount increased by 102.6 percent. The bank makes extensive use of innovative and/or complex investments to support CD initiatives, including significant work with CDFIs and unique and creative affordable housing projects, and exhibits excellent responsiveness to credit and CD needs. Comerica's investments primarily focused on affordable housing, which reflects favorably on the bank since multiple community contacts emphasized the need for affordable housing in the AA. Additionally, housing cost burden data from the U.S. Department of Housing and Urban Development (HUD) demonstrated a significant need for affordable housing.

Table 53 illustrates the breakdown of the bank's CD investments, grants, and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. Examples of notable investment and donation activities made by the bank include:

- Nineteen investments totaling \$18.2 million in LIHTC-eligible funds for the construction or preservation of rent-restricted units for LMI individuals in the AA. This investment is particularly responsive given community contacts indicated a significant shortage of affordable housing in the AA.
- A \$500,000 equity investment to a CDFI that provides access to capital for small businesses located in the AA.

**Table 53**

| <b>Investment, Grants, and Donations</b>               |                                             |                 |                                        |                 |                  |                 |              |                 |
|--------------------------------------------------------|---------------------------------------------|-----------------|----------------------------------------|-----------------|------------------|-----------------|--------------|-----------------|
| <b>Assessment Area: Dallas-Fort Worth Metropolitan</b> |                                             |                 |                                        |                 |                  |                 |              |                 |
| <b>Community Development Purpose</b>                   | <b>Prior Period Investments<sup>1</sup></b> |                 | <b>Current Investments<sup>2</sup></b> |                 | <b>Donations</b> |                 | <b>Total</b> |                 |
|                                                        | <b>#</b>                                    | <b>\$(000s)</b> | <b>#</b>                               | <b>\$(000s)</b> | <b>#</b>         | <b>\$(000s)</b> | <b>#</b>     | <b>\$(000s)</b> |
| Affordable Housing                                     | 15                                          | 18,213          | 5                                      | 38,163          | 9                | 66              | 29           | 56,442          |
| Community Services                                     | 0                                           | 0               | 0                                      | 0               | 137              | 2,640           | 137          | 2,640           |
| Economic Development                                   | 0                                           | 0               | 3                                      | 8,922           | 18               | 467             | 21           | 9,389           |
| Revitalization and Stabilization                       | 0                                           | 0               | 0                                      | 0               | 1                | 20              | 1            | 20              |
| <b>Total</b>                                           | <b>15</b>                                   | <b>18,213</b>   | <b>8</b>                               | <b>47,085</b>   | <b>165</b>       | <b>3,193</b>    | <b>188</b>   | <b>68,491</b>   |

<sup>1</sup> Book value of investment<sup>2</sup> Original market value of investment

## SERVICE TEST

The bank's Service Test performance is excellent.

## Retail Services

Comerica's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's 55 branch offices and 89 ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the AA census tract income categories. Table 54 summarizes the bank's retail locations in the AA.

**Table 54**

| Branch and Full-Service ATM Locations<br>Assessment Area: Dallas-Fort Worth Metropolitan |                     |                    |                    |           |              |                   |              |
|------------------------------------------------------------------------------------------|---------------------|--------------------|--------------------|-----------|--------------|-------------------|--------------|
| Tract<br>Income                                                                          | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches  |              | Full-Service ATMs |              |
|                                                                                          |                     |                    |                    | #         | %            | #                 | %            |
| Low                                                                                      | 9.5                 | 9.2                | 5.4                | 7         | 12.7         | 10                | 11.2         |
| Moderate                                                                                 | 26.0                | 24.7               | 19.3               | 8         | 14.6         | 9                 | 10.1         |
| Middle                                                                                   | 28.9                | 30.7               | 30.5               | 19        | 34.6         | 33                | 37.1         |
| Upper                                                                                    | 34.0                | 34.5               | 44.0               | 21        | 38.2         | 37                | 41.6         |
| Unknown                                                                                  | 1.5                 | 0.8                | 0.9                | 0         | 0.0          | 0                 | 0.0          |
| <b>Total</b>                                                                             | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>55</b> | <b>100.0</b> | <b>89</b>         | <b>100.0</b> |

The bank opened one branch in an upper-income census tract and closed one branch in moderate-income census tract. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

## Community Development Services

Comerica is a leader in providing CD services in the AA. The bank's employees served in 148 organizations offering 1,243 CD services that aid LMI individuals for a total of 3,655 hours. The bank demonstrates significant responsiveness to AA CD needs, by increasing the number of community service hours served since the previous evaluation by 121.4 percent.

Comerica employees devoted over 800 hours serving nonprofit organizations in various capacities, demonstrating the bank's significant commitment to the well-being of LMI individuals and geographies. In addition to the significant community service hours noted, Comerica BusinessHQ opened in early 2023 to support small businesses in the AA. This \$5 million proof-of-concept collaborative space has served more than 400 individuals, providing approximately \$4,500 worth of no-cost coworking and tailored technical assistance by bank employees at the location. In response to the overwhelming success of the location and the development of new avenues to serve the area created through Comerica BusinessHQ, the bank intends to extend the concept to other AAs. This commitment to serving the bank's AA through such a program, despite it not fitting within established definitions of qualified CD activity, reflects very favorably on the bank's responsiveness and innovation to the needs of its communities.

**SAN ANTONIO METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN ANTONIO ASSESSMENT AREA**

- The San Antonio Metropolitan AA is comprised of Bexar and Kendall counties, which represent a portion of the San Antonio-New Braunfels, TX MSA. The AA excludes the following MSA counties: Atascosa, Bandera, Comal, Guadalupe, Medina, and Wilson. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA consists of 384 census tracts, of which 9.1 percent are designated as low-income, 35.7 percent as moderate-income, 26.8 percent as middle-income, 27.3 percent as upper-income, and 1.0 percent as unknown-income.
- The 2020 U.S. Census added 12 new census tracts within the AA, resulting in an increase of 3.2 percent. The number of geographies designated as LMI increased by 4.7 percent.
- The bank operates six full-service branches in the AA: three branches in moderate-income, two branches in middle-income, and one branch in an upper-income census tract.
- According to the June 30, 2022, FDIC Market Share Report, Comerica had a 0.1 percent market share, ranking 19<sup>th</sup> out of 49 of FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 146<sup>th</sup> out of 719 HMDA reporters in the AA with 26 HMDA originations and purchases, and 40<sup>th</sup> out of 189 CRA reporters with 74 CRA small business loans.
- A community contact noted a significant need for affordable housing, mortgage payment assistance, and access to credit for LMI individuals and families as well as small businesses and entrepreneurs. The community contact also noted that financial institutions should continue to invest in CDFIs, as they support small business by providing financing and technical support.

**Table 55**

| <b>Population Change</b>                                                                                    |                        |                        |                          |
|-------------------------------------------------------------------------------------------------------------|------------------------|------------------------|--------------------------|
| <b>Assessment Area: San Antonio Metropolitan</b>                                                            |                        |                        |                          |
| <b>Area</b>                                                                                                 | <b>2015 Population</b> | <b>2020 Population</b> | <b>Percentage Change</b> |
| San Antonio Metropolitan AA                                                                                 | 1,862,863              | 2,053,603              | 10.2                     |
| Bexar County, TX                                                                                            | 1,825,502              | 2,009,324              | 10.1                     |
| Kendall County, TX                                                                                          | 37,361                 | 44,279                 | 18.5                     |
| San Antonio-New Braunfels, TX MSA                                                                           | 2,286,702              | 2,558,143              | 11.9                     |
| Texas                                                                                                       | 26,538,614             | 29,145,505             | 9.8                      |
| Source: 2020 U.S. Census Bureau Decennial Census<br>2011-2015 U.S. Census Bureau: American Community Survey |                        |                        |                          |

- The AA population growth between 2015 and 2020 is comparable to the statewide rate. While population growth in Bexar County mirrors the AA and the statewide rates, Kendall County experienced a significant increase in population, at a 18.5 percent, during the same period.

**Table 56**

| <b>Median Family Income Change</b>                                                                                                 |                                  |                                  |                          |
|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|--------------------------|
| <b>Assessment Area: San Antonio Metropolitan</b>                                                                                   |                                  |                                  |                          |
| <b>Area</b>                                                                                                                        | <b>2015 Median Family Income</b> | <b>2020 Median Family Income</b> | <b>Percentage Change</b> |
| San Antonio Metropolitan AA                                                                                                        | 65,503                           | 70,666                           | 7.9                      |
| Bexar County, TX                                                                                                                   | 64,842                           | 70,280                           | 8.4                      |
| Kendall County, TX                                                                                                                 | 96,812                           | 117,734                          | 21.6                     |
| San Antonio-New Braunfels, TX MSA                                                                                                  | 67,989                           | 74,284                           | 9.3                      |
| Texas                                                                                                                              | 68,523                           | 76,073                           | 11.0                     |
| <i>Source: 2011-2015 U.S. Census Bureau: American Community Survey<br/>2016-2020 U.S. Census Bureau: American Community Survey</i> |                                  |                                  |                          |
| <i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>                                 |                                  |                                  |                          |

- While the AA's MFI increased at a lower rate than the state of Texas' MFI between 2015 and 2020, Bexar County's MFI grew at a comparable rate. Conversely, Kendall County's MFI grew significantly, at a 21.6 percent, almost doubling the statewide percentage change during the same period.
- The 2020 MFI in Kendall County exceeds the MFI for the AA and the state by at least \$40,000. It is noteworthy that only 2.6 percent of the AA families reside in Kendall County, limiting the impact in the AA MFI.
- According to 2020 FFIEC data, 11.6 percent of AA families live below the poverty level. In contrast, only 3.0 percent of Kendall County's families live below the poverty level.

**Table 57**

| <b>Housing Cost Burden</b>                                                                                                    |                              |                        |                    |                             |                        |                   |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------|------------------------|--------------------|-----------------------------|------------------------|-------------------|
| <b>Assessment Area: San Antonio Metropolitan</b>                                                                              |                              |                        |                    |                             |                        |                   |
| <b>Area</b>                                                                                                                   | <b>Cost Burden - Renters</b> |                        |                    | <b>Cost Burden - Owners</b> |                        |                   |
|                                                                                                                               | <b>Low Income</b>            | <b>Moderate Income</b> | <b>All Renters</b> | <b>Low Income</b>           | <b>Moderate Income</b> | <b>All Owners</b> |
| San Antonio Metropolitan AA                                                                                                   | 77.7                         | 46.5                   | 44.2               | 58.3                        | 34.3                   | 20.4              |
| Bexar County, TX                                                                                                              | 77.9                         | 46.9                   | 44.3               | 58.4                        | 34.6                   | 20.4              |
| Kendall County, TX                                                                                                            | 64.1                         | 22.3                   | 35.1               | 55.0                        | 25.1                   | 18.5              |
| San Antonio-New Braunfels, TX MSA                                                                                             | 76.8                         | 46.5                   | 43.0               | 57.2                        | 32.6                   | 19.4              |
| Texas                                                                                                                         | 77.4                         | 42.4                   | 42.4               | 57.5                        | 30.9                   | 19.2              |
| <i>Cost burden is housing cost that equals 30 percent or more of household income.</i>                                        |                              |                        |                    |                             |                        |                   |
| <i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i> |                              |                        |                    |                             |                        |                   |

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- The cost burden for LMI renters is lower in Kendall County, with a median gross rent of \$1,278, than the Bexar County and the statewide cost burden.
- The AA median housing value, at \$173,821, is below the statewide, at \$187,200. Kendall County's median housing value, at \$378,500, significantly exceeds the AA and state of Texas housing values.

**Table 58**

| <b>Unemployment Rates</b>                                                     |             |             |             |             |             |
|-------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Assessment Area: San Antonio Metropolitan</b>                              |             |             |             |             |             |
| <b>Region</b>                                                                 | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| San Antonio Metropolitan AA                                                   | 3.4         | 3.1         | 7.6         | 5.3         | 5.3         |
| Bexar County, TX                                                              | 3.4         | 3.2         | 7.6         | 5.4         | 5.4         |
| Kendall County, TX                                                            | 2.9         | 2.7         | 5.1         | 3.8         | 3.8         |
| San Antonio-New Braunfels, TX MSA                                             | 3.3         | 3.1         | 7.3         | 5.2         | 5.2         |
| Texas                                                                         | 3.9         | 3.5         | 7.7         | 5.7         | 3.9         |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> |             |             |             |             |             |

- Unemployment rates for the AA and Bexar County between 2018 and 2021 are comparable to the statewide rate. However, Kendall County's unemployment rates are consistently below the statewide during the same period.
- Unemployment rates almost doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay at home and social distancing orders. While AA unemployment rates stabilized in 2021 and 2022, they have not reached pre-pandemic rates levels. The statewide unemployment rates reached pre-pandemic levels in 2022.
- Major employment industries within the AA include accommodation and food services, healthcare and social assistance, and retail trade.

Table 59 details selected characteristics of the AA.

**Table 59**

| 2022 Combined Demographics                                                                                              |                           |                       |                                    |       |                                           |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-------|-------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: San Antonio Metropolitan                                                                               |                           |                       |                                    |       |                                           |           |                           |           |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |       | Families < Poverty Level as % of Families |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %     | #                                         | %         | #                         | %         |
| Low                                                                                                                     | 35                        | 9.1                   | 28,772                             | 6.6   | 9,445                                     | 32.8      | 101,893                   | 23.5      |
| Moderate                                                                                                                | 137                       | 35.7                  | 140,036                            | 32.4  | 25,471                                    | 18.2      | 76,516                    | 17.7      |
| Middle                                                                                                                  | 103                       | 26.8                  | 124,152                            | 28.7  | 10,430                                    | 8.4       | 84,401                    | 19.5      |
| Upper                                                                                                                   | 105                       | 27.3                  | 139,762                            | 32.3  | 4,957                                     | 3.5       | 169,912                   | 39.3      |
| Unknown                                                                                                                 | 4                         | 1.0                   | 0                                  | 0.0   | 0                                         | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 384                       | 100.0                 | 432,722                            | 100.0 | 50,303                                    | 11.6      | 432,722                   | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |       |                                           |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |       | Rental                                    |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by                               | % by  | #                                         | % by unit | #                         | % by unit |
| Low                                                                                                                     | 52,666                    | 18,604                | 4.8                                | 35.3  | 28,356                                    | 53.8      | 5,706                     | 10.8      |
| Moderate                                                                                                                | 249,019                   | 112,263               | 28.9                               | 45.1  | 114,098                                   | 45.8      | 22,658                    | 9.1       |
| Middle                                                                                                                  | 200,364                   | 116,544               | 30.0                               | 58.2  | 71,184                                    | 35.5      | 12,636                    | 6.3       |
| Upper                                                                                                                   | 214,085                   | 140,883               | 36.3                               | 65.8  | 57,418                                    | 26.8      | 15,784                    | 7.4       |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0   | 0                                         | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 716,134                   | 388,294               | 100.0                              | 54.2  | 271,056                                   | 37.8      | 56,784                    | 7.9       |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |       |                                           |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |       | Over \$1 Million                          |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %     | #                                         | %         | #                         | %         |
| Low                                                                                                                     | 5,350                     | 6.1                   | 4,736                              | 5.8   | 572                                       | 10.9      | 42                        | 4.6       |
| Moderate                                                                                                                | 23,250                    | 26.4                  | 21,469                             | 26.2  | 1,637                                     | 31.3      | 144                       | 15.9      |
| Middle                                                                                                                  | 22,482                    | 25.6                  | 21,062                             | 25.7  | 1,232                                     | 23.5      | 188                       | 20.8      |
| Upper                                                                                                                   | 36,692                    | 41.7                  | 34,414                             | 42.1  | 1,749                                     | 33.4      | 529                       | 58.4      |
| Unknown                                                                                                                 | 181                       | 0.2                   | 136                                | 0.2   | 42                                        | 0.8       | 3                         | 0.3       |
| Total AA                                                                                                                | 87,955                    | 100.0                 | 81,817                             | 100.0 | 5,232                                     | 100.0     | 906                       | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 93.0  |                                           | 5.9       |                           | 1.0       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |       |                                           |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |       | Over \$1 Million                          |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %     | #                                         | %         | #                         | %         |
| Low                                                                                                                     | 13                        | 1.4                   | 13                                 | 1.4   | 0                                         | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 149                       | 16.2                  | 147                                | 16.1  | 2                                         | 25.0      | 0                         | 0.0       |
| Middle                                                                                                                  | 193                       | 21.0                  | 191                                | 20.9  | 2                                         | 25.0      | 0                         | 0.0       |
| Upper                                                                                                                   | 565                       | 61.4                  | 561                                | 61.5  | 4                                         | 50.0      | 0                         | 0.0       |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0   | 0                                         | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 920                       | 100.0                 | 912                                | 100.0 | 8                                         | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 99.1  |                                           | 0.9       |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |       |                                           |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |       |                                           |           |                           |           |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Comerica's Lending Test performance in the AA is good. The bank's small business lending generally carried more weight, as this product comprised the largest volume of lending in the AA. The bank's home mortgage lending activity was evaluated as a whole given the insufficient volume by sub-products to conduct a meaning analysis.

Details of the bank's 2020 mortgage and small business lending and corresponding aggregate data can be found in Appendix C.

#### **Lending Activity**

The bank's lending activity in the San Antonio Metropolitan AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve AA credit needs, including LMI borrowers. The bank originated 84 home mortgage and 351 small business loans in the AA between January 1, 2020, and December 31, 2022. These volumes represent 2.7 percent of the HMDA-reportable loans and 4.2 percent of the CRA-reportable loans in the state of Texas during the review period. Comerica sustained a constant volume of home mortgage lending between 2020 and 2022; however, the volume of small business lending significantly decreased year after year. The reduction in small business lending is primarily attributed to the cessation of the SBA's PPP in May 2021 and rising interest rates in 2022. It is noteworthy that the level of home mortgage lending has not been adversely impacted by the interest rate hikes. This level of lending reflects favorably on the bank as it aligns with the bank's strategic focus on small business lending.

#### **Geographic Distribution of Loans**

Comerica's geographic distribution of lending reflects excellent penetration throughout the AA. The distribution of home mortgage and small business lending is consistent with the overall conclusion, reflecting excellent penetration among geographies of different income levels, especially LMI census tracts. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### *Residential Real Estate (HMDA) Lending*

The geographic distribution of home mortgage lending reflects excellent penetration throughout the AA. The distribution of 2020 and 2021 home mortgage loans among low-income census tracts exceeds aggregate data and the demographic figure, though the bank did not make any loans in low-income census tracts in 2022. The distribution of the bank's home mortgage lending in moderate-income census tracts is also well above aggregate data and comparable to demographic figures in each year of the review period.

**Table 60A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                               | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                               | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                               | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                                | 0.0   | 1.9   | 0       | 0.0   | 1.3   | 0    | 0.0   | 2.3   | 0       | 0.0   | 1.4   | 4.8                          |
| Moderate                                                                                                                      | 0                                | 0.0   | 15.3  | 0       | 0.0   | 10.6  | 0    | 0.0   | 18.1  | 0       | 0.0   | 12.4  | 28.9                         |
| Middle                                                                                                                        | 0                                | 0.0   | 34.3  | 0       | 0.0   | 28.1  | 0    | 0.0   | 34.1  | 0       | 0.0   | 27.9  | 30.0                         |
| Upper                                                                                                                         | 1                                | 100.0 | 48.5  | 190     | 100.0 | 59.9  | 1    | 100.0 | 45.5  | 100     | 100.0 | 58.3  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                         | 1                                | 100.0 | 100.0 | 190     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 100     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                           | 1                                | 12.5  | 1.1   | 310     | 22.9  | 0.8   | 0    | 0.0   | 2.3   | 0       | 0.0   | 1.3   | 4.8                          |
| Moderate                                                                                                                      | 3                                | 37.5  | 11.7  | 487     | 36.0  | 7.6   | 1    | 12.5  | 19.8  | 121     | 5.8   | 13.3  | 28.9                         |
| Middle                                                                                                                        | 2                                | 25.0  | 28.3  | 126     | 9.3   | 22.5  | 1    | 12.5  | 32.2  | 60      | 2.9   | 25.9  | 30.0                         |
| Upper                                                                                                                         | 2                                | 25.0  | 58.9  | 429     | 31.7  | 69.1  | 6    | 75.0  | 45.7  | 1,893   | 91.3  | 59.5  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                         | 8                                | 100.0 | 100.0 | 1,352   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 2,074   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                           | 2                                | 25.0  | 2.5   | 134     | 16.7  | 1.6   | 0    | 0.0   | 2.4   | 0       | 0.0   | 1.6   | 4.8                          |
| Moderate                                                                                                                      | 2                                | 25.0  | 19.0  | 120     | 15.0  | 14.4  | 4    | 66.7  | 17.6  | 237     | 60.6  | 13.6  | 28.9                         |
| Middle                                                                                                                        | 2                                | 25.0  | 23.1  | 89      | 11.1  | 18.0  | 1    | 16.7  | 24.3  | 80      | 20.5  | 18.6  | 30.0                         |
| Upper                                                                                                                         | 2                                | 25.0  | 55.4  | 459     | 57.2  | 66.1  | 1    | 16.7  | 55.7  | 74      | 18.9  | 66.2  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                         | 8                                | 100.0 | 100.0 | 802     | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 391     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                           | 0                                | 0.0   | 9.4   | 0       | 0.0   | 5.8   | 0    | 0.0   | 7.8   | 0       | 0.0   | 5.4   | 10.0                         |
| Moderate                                                                                                                      | 0                                | 0.0   | 46.3  | 0       | 0.0   | 37.8  | 0    | 0.0   | 45.2  | 0       | 0.0   | 37.5  | 40.7                         |
| Middle                                                                                                                        | 0                                | 0.0   | 23.1  | 0       | 0.0   | 25.7  | 0    | 0.0   | 28.9  | 0       | 0.0   | 32.9  | 24.1                         |
| Upper                                                                                                                         | 0                                | 0.0   | 21.3  | 0       | 0.0   | 30.6  | 2    | 100.0 | 18.1  | 79,670  | 100.0 | 24.2  | 25.2                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                         | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 2    | 100.0 | 100.0 | 79,670  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                           | 4                                | 14.3  | 1.6   | 484     | 12.4  | 1.4   | 0    | 0.0   | 2.3   | 0       | 0.0   | 1.9   | 4.8                          |
| Moderate                                                                                                                      | 9                                | 32.1  | 14.0  | 1,060   | 27.2  | 11.6  | 8    | 30.8  | 18.7  | 565     | 0.7   | 15.6  | 28.9                         |
| Middle                                                                                                                        | 5                                | 17.9  | 31.5  | 350     | 9.0   | 25.7  | 3    | 11.5  | 33.3  | 258     | 0.3   | 28.0  | 30.0                         |
| Upper                                                                                                                         | 10                               | 35.7  | 52.8  | 2,008   | 51.5  | 61.2  | 15   | 57.7  | 45.7  | 82,643  | 99.0  | 54.5  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                         | 28                               | 100.0 | 100.0 | 3,902   | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 83,466  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |



**Table 60B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                               | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                               | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                               | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                           | 1                                | 9.1   | 2.1   | 40      | 2.6   | 1.6   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.5   | 4.8                          |
| Moderate                                                                                                                      | 4                                | 36.4  | 13.9  | 453     | 29.1  | 7.7   | 2    | 25.0  | 10.6  | 140     | 12.0  | 8.3   | 28.9                         |
| Middle                                                                                                                        | 1                                | 9.1   | 20.6  | 135     | 8.7   | 14.3  | 1    | 12.5  | 22.2  | 118     | 10.1  | 16.1  | 30.0                         |
| Upper                                                                                                                         | 5                                | 45.5  | 63.4  | 930     | 59.7  | 76.4  | 5    | 62.5  | 66.2  | 906     | 77.8  | 75.0  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                         | 11                               | 100.0 | 100.0 | 1,558   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 1,164   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                                | 0.0   | 3.6   | 0       | 0.0   | 1.9   | 0    | 0.0   | 2.4   | 0       | 0.0   | 1.5   | 4.8                          |
| Moderate                                                                                                                      | 0                                | 0.0   | 23.6  | 0       | 0.0   | 13.1  | 1    | 100.0 | 21.9  | 67      | 100.0 | 14.1  | 28.9                         |
| Middle                                                                                                                        | 0                                | 0.0   | 27.8  | 0       | 0.0   | 16.7  | 0    | 0.0   | 26.5  | 0       | 0.0   | 19.4  | 30.0                         |
| Upper                                                                                                                         | 0                                | 0.0   | 45.0  | 0       | 0.0   | 68.3  | 0    | 0.0   | 49.2  | 0       | 0.0   | 65.0  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                         | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 67      | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                                | 0.0   | 3.5   | 0       | 0.0   | 2.1   | 0    | 0.0   | 3.5   | 0       | 0.0   | 3.8   | 4.8                          |
| Moderate                                                                                                                      | 0                                | 0.0   | 27.1  | 0       | 0.0   | 19.7  | 0    | 0.0   | 30.8  | 0       | 0.0   | 23.4  | 28.9                         |
| Middle                                                                                                                        | 0                                | 0.0   | 41.0  | 0       | 0.0   | 38.9  | 0    | 0.0   | 45.8  | 0       | 0.0   | 39.7  | 30.0                         |
| Upper                                                                                                                         | 0                                | 0.0   | 28.4  | 0       | 0.0   | 39.3  | 0    | 0.0   | 19.9  | 0       | 0.0   | 33.1  | 36.3                         |
| Unknown                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                         | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. While the volume of small business lending decreased year after year during the review period, the distribution of small business loans among low-income census tracts consistently exceeds aggregate data and the demographic figure. Additionally, the bank's small business lending in moderate-income census tracts generally exceeds aggregate data and the demographic figure. Comerica's 2021 performance in moderate-income tracts declined slightly but remained comparable to both figures. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA.

**Table 61**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                            | 17                               | 14.8  | 4.3   | 3,912   | 15.4  | 5.7   | 8    | 10.8  | 5.6   | 1,628   | 7.8   | 8.1   | 6.1                      |
| Moderate                                                                                                                       | 26                               | 22.6  | 21.8  | 5,365   | 21.1  | 21.5  | 24   | 32.4  | 23.4  | 7,281   | 34.9  | 24.0  | 26.4                     |
| Middle                                                                                                                         | 26                               | 22.6  | 26.5  | 4,218   | 16.6  | 27.4  | 16   | 21.6  | 23.8  | 5,189   | 24.9  | 20.5  | 25.6                     |
| Upper                                                                                                                          | 46                               | 40.0  | 46.8  | 11,955  | 47.0  | 44.9  | 26   | 35.1  | 46.6  | 6,756   | 32.4  | 46.7  | 41.7                     |
| Unknown                                                                                                                        | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.5   | 0.2                      |
| Total                                                                                                                          | 115                              | 100.0 | 100.0 | 25,450  | 100.0 | 100.0 | 74   | 100.0 | 100.0 | 20,854  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic characteristics and the performance of aggregate lenders. The bank's 2021 and 2022 lending to low-income borrowers significantly exceeds aggregate data and is comparable to the demographic figure, reflecting improvement from its 2020 performance.

The bank's lending to moderate-income borrowers improved year after year. In 2020, the bank's performance is below aggregate and demographic data. While Comerica's 2021 performance is comparable to aggregate and demographic data, it significantly exceeds both figures in 2022. The shift in performance is especially notable given the rising interest rate environment in 2022.

The bank's 2020 lending performance exceeds aggregate data and is significantly below the demographic figure. However, this has limited impact in rating the bank's performance, as aggregate data serves as a better proxy for loan demand.

**Table 62A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Antonio Metropolitan                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                                                                                              | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                                                                                                          | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                                | 0.0   | 2.5   | 0       | 0.0   | 1.3   | 0    | 0.0   | 2.1   | 0       | 0.0   | 1.0   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 0                                | 0.0   | 14.8  | 0       | 0.0   | 10.5  | 0    | 0.0   | 14.1  | 0       | 0.0   | 9.9   | 17.7                              |
| Middle                                                                                                                                                                                                                                   | 0                                | 0.0   | 21.8  | 0       | 0.0   | 19.3  | 0    | 0.0   | 21.4  | 0       | 0.0   | 19.0  | 19.5                              |
| Upper                                                                                                                                                                                                                                    | 1                                | 100.0 | 33.4  | 190     | 100.0 | 43.3  | 1    | 100.0 | 35.3  | 100     | 100.0 | 44.9  | 39.3                              |
| Unknown                                                                                                                                                                                                                                  | 0                                | 0.0   | 27.5  | 0       | 0.0   | 25.6  | 0    | 0.0   | 27.0  | 0       | 0.0   | 25.2  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 1                                | 100.0 | 100.0 | 190     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 100     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 2                                | 25.0  | 2.7   | 126     | 9.3   | 1.2   | 0    | 0.0   | 6.5   | 0       | 0.0   | 3.4   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 1                                | 12.5  | 9.2   | 161     | 11.9  | 5.7   | 2    | 25.0  | 18.3  | 226     | 10.9  | 12.5  | 17.7                              |
| Middle                                                                                                                                                                                                                                   | 2                                | 25.0  | 15.3  | 189     | 14.0  | 11.5  | 0    | 0.0   | 20.6  | 0       | 0.0   | 17.4  | 19.5                              |
| Upper                                                                                                                                                                                                                                    | 3                                | 37.5  | 34.7  | 876     | 64.8  | 40.7  | 6    | 75.0  | 37.1  | 1,848   | 89.1  | 48.4  | 39.3                              |
| Unknown                                                                                                                                                                                                                                  | 0                                | 0.0   | 38.2  | 0       | 0.0   | 40.9  | 0    | 0.0   | 17.4  | 0       | 0.0   | 18.2  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 8                                | 100.0 | 100.0 | 1,352   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 2,074   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 3                                | 37.5  | 6.1   | 113     | 14.1  | 3.3   | 2    | 33.3  | 6.3   | 32      | 8.2   | 3.4   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 1                                | 12.5  | 13.0  | 30      | 3.7   | 8.1   | 4    | 66.7  | 15.3  | 359     | 91.8  | 10.1  | 17.7                              |
| Middle                                                                                                                                                                                                                                   | 1                                | 12.5  | 19.0  | 100     | 12.5  | 15.1  | 0    | 0.0   | 19.8  | 0       | 0.0   | 15.4  | 19.5                              |
| Upper                                                                                                                                                                                                                                    | 2                                | 25.0  | 59.7  | 459     | 57.2  | 69.7  | 0    | 0.0   | 55.4  | 0       | 0.0   | 68.0  | 39.3                              |
| Unknown                                                                                                                                                                                                                                  | 1                                | 12.5  | 2.3   | 100     | 12.5  | 3.8   | 0    | 0.0   | 3.3   | 0       | 0.0   | 3.1   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 8                                | 100.0 | 100.0 | 802     | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 391     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 7                                | 25.0  | 2.6   | 403     | 10.3  | 1.3   | 5    | 20.8  | 3.4   | 202     | 5.3   | 1.5   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 4                                | 14.3  | 12.1  | 471     | 12.1  | 8.4   | 7    | 29.2  | 15.0  | 675     | 17.8  | 10.3  | 17.7                              |
| Middle                                                                                                                                                                                                                                   | 5                                | 17.9  | 18.6  | 528     | 13.5  | 15.9  | 2    | 8.3   | 20.8  | 318     | 8.4   | 18.5  | 19.5                              |
| Upper                                                                                                                                                                                                                                    | 11                               | 39.3  | 34.0  | 2,400   | 61.5  | 42.2  | 10   | 41.7  | 36.3  | 2,601   | 68.5  | 45.8  | 39.3                              |
| Unknown                                                                                                                                                                                                                                  | 1                                | 3.6   | 32.7  | 100     | 2.6   | 32.1  | 0    | 0.0   | 24.5  | 0       | 0.0   | 23.8  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 28                               | 100.0 | 100.0 | 3,902   | 100.0 | 100.0 | 24   | 100.0 | 100.0 | 3,796   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table 62B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: San Antonio Metropolitan                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 18.2  | 6.2   | 164     | 10.5  | 4.3   | 2    | 25.0  | 6.1   | 103     | 8.8   | 4.4   | 23.5                              |
| Moderate                                                                     | 2                                | 18.2  | 14.9  | 280     | 18.0  | 8.8   | 1    | 12.5  | 13.8  | 90      | 7.7   | 10.7  | 17.7                              |
| Middle                                                                       | 2                                | 18.2  | 18.0  | 239     | 15.3  | 12.6  | 2    | 25.0  | 17.6  | 318     | 27.3  | 11.8  | 19.5                              |
| Upper                                                                        | 5                                | 45.5  | 57.2  | 875     | 56.2  | 70.8  | 3    | 37.5  | 57.6  | 653     | 56.1  | 68.1  | 39.3                              |
| Unknown                                                                      | 0                                | 0.0   | 3.6   | 0       | 0.0   | 3.5   | 0    | 0.0   | 4.9   | 0       | 0.0   | 5.0   | 0.0                               |
| Total                                                                        | 11                               | 100.0 | 100.0 | 1,558   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 1,164   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 9.1   | 0       | 0.0   | 4.2   | 1    | 100.0 | 9.5   | 67      | 100.0 | 5.1   | 23.5                              |
| Moderate                                                                     | 0                                | 0.0   | 18.4  | 0       | 0.0   | 9.0   | 0    | 0.0   | 18.0  | 0       | 0.0   | 11.6  | 17.7                              |
| Middle                                                                       | 0                                | 0.0   | 21.0  | 0       | 0.0   | 12.0  | 0    | 0.0   | 19.5  | 0       | 0.0   | 13.9  | 19.5                              |
| Upper                                                                        | 0                                | 0.0   | 45.9  | 0       | 0.0   | 65.9  | 0    | 0.0   | 49.2  | 0       | 0.0   | 63.1  | 39.3                              |
| Unknown                                                                      | 0                                | 0.0   | 5.5   | 0       | 0.0   | 8.9   | 0    | 0.0   | 3.7   | 0       | 0.0   | 6.3   | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 67      | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.2   | 0    | 0.0   | 2.1   | 0       | 0.0   | 1.2   | 23.5                              |
| Moderate                                                                     | 0                                | 0.0   | 0.9   | 0       | 0.0   | 0.7   | 0    | 0.0   | 1.2   | 0       | 0.0   | 1.1   | 17.7                              |
| Middle                                                                       | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.5   | 19.5                              |
| Upper                                                                        | 0                                | 0.0   | 0.6   | 0       | 0.0   | 1.4   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 39.3                              |
| Unknown                                                                      | 0                                | 0.0   | 97.6  | 0       | 0.0   | 97.1  | 0    | 0.0   | 96.4  | 0       | 0.0   | 97.0  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

The borrower distribution of small business loans by revenue size of businesses is good. The 2022 loan distribution to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA and aggregate data by number of originations; however, Comerica's performance by dollar amount is comparable to aggregate data. This is reflective of the bank's willingness to lend larger sums to small businesses. Moreover, aggregate data serves as a better indicator for loan demand than the demographic figure.

In 2021, the bank's lending to businesses with annual revenues of \$1 million or less is comparable to aggregate lending performance, but well below the demographic figure. Conversely, Comerica's lending performance in 2020 reflected penetration levels greater than 2021 and 2022, originating a significantly larger portion of small business loans to businesses with revenues of \$1 million or less than aggregate lenders. It is noteworthy that Comerica's number volume of small business loans has decreased by 69.1 percent between 2020 and 2022, but only 23.8 percent by dollar amount. This declining performance is primarily attributed to the cessation of the SBA's PPP in May 2021 and rising interest rates in 2022.

**Table 63**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Antonio Metropolitan                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 47                               | 40.9  | 43.8  | 7,498   | 29.5  | 27.5  | 25   | 33.8  | 46.4  | 6,871   | 32.9  | 29.4  | 93.0                     |
| Over \$1 Million                                                                   | 48                               | 41.7  |       | 15,281  | 60.0  |       | 43   | 58.1  |       | 12,469  | 59.8  |       | 5.9                      |
| Revenue Unknown                                                                    | 20                               | 17.4  |       | 2,671   | 10.5  |       | 6    | 8.1   |       | 1,514   | 7.3   |       | 1.0                      |
| Total                                                                              | 115                              | 100.0 |       | 25,450  | 100.0 |       | 74   | 100.0 |       | 20,854  | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 58                               | 50.4  | 91.0  | 2,713   | 10.7  | 33.8  | 29   | 39.2  | 93.2  | 1,575   | 7.6   | 35.1  |                          |
| \$100,001 - \$250,000                                                              | 23                               | 20.0  | 5.0   | 3,872   | 15.2  | 18.7  | 18   | 24.3  | 3.5   | 3,583   | 17.2  | 16.0  |                          |
| \$250,001 - \$1 Million                                                            | 34                               | 29.6  | 4.0   | 18,865  | 74.1  | 47.5  | 27   | 36.5  | 3.3   | 15,696  | 75.3  | 48.9  |                          |
| Total                                                                              | 115                              | 100.0 | 100.0 | 25,450  | 100.0 | 100.0 | 74   | 100.0 | 100.0 | 20,854  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 31                               | 66.0  |       | 1,322   | 17.6  |       | 12   | 48.0  |       | 589     | 8.6   |       |                          |
| \$100,001 - \$250,000                                                              | 8                                | 17.0  |       | 1,339   | 17.9  |       | 5    | 20.0  |       | 1,100   | 16.0  |       |                          |
| \$250,001 - \$1 Million                                                            | 8                                | 17.0  |       | 4,837   | 64.5  |       | 8    | 32.0  |       | 5,182   | 75.4  |       |                          |
| Total                                                                              | 47                               | 100.0 |       | 7,498   | 100.0 |       | 25   | 100.0 |       | 6,871   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

## Community Development Lending

The bank makes a relatively high level of CD loans in the AA, originating a total of 14 qualifying CD loans, totaling \$47.5 million. Since the previous evaluation, the bank substantially increased the dollar amount of CD loans by 90.9 percent. The majority of the CD loans were extended for the purpose of economic development, focusing on financing small businesses and supporting permanent job creation or retention or improvement for LMI persons or in LMI geographies. Examples of the bank's CD lending activities that were considered responsive to the credit needs in the AA include:

- A \$15 million line of credit extended to a small business that processes and distributes nuts, seeds, dried fruit, and snack mixes. Funds expected to support ongoing business operations and permanent jobs for LMI employees.
- A \$638,000 line of credit extended to a small business to expand its car wash operations and support permanent jobs for LMI employees.

**Table 64**

| Community Development Lending<br>Assessment Area: San Antonio Metropolitan |           |               |
|----------------------------------------------------------------------------|-----------|---------------|
| Purpose                                                                    | #         | \$000s        |
| Affordable Housing                                                         | 0         | 0             |
| Community Services                                                         | 2         | 1,000         |
| Economic Development                                                       | 8         | 43,065        |
| Revitalization and Stabilization                                           | 4         | 3,392         |
| <b>Total</b>                                                               | <b>14</b> | <b>47,457</b> |

**INVESTMENT TEST**

The bank's performance under the Investment Test in the AA is good. Comerica is occasionally in a leadership position given its significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank makes significant use of innovative or complex investments to support CD initiatives and exhibits good responsiveness to AA needs. The bank's overall dollar amount of CD investments and grants significantly increased by 28.7 percent since the previous evaluation while the number volume decreased by 31.0 percent. Comerica's investments primarily focused on affordable housing, which reflects good responsiveness as community contacts emphasized the need for affordable housing in the AA.

Table 65 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. Examples of notable investment and donation activities that reflect Comerica's efforts to meet the CD and credit needs of the AA include:

- A \$250,000 equity investment to a CDFI that provides access to capital for small businesses in the AA.
- A \$5.9 million investment in LIHTC-eligible funds for the construction or preservation of rent-restricted units for LMI individuals.

**Table 65**

| Investment, Grants, and Donations<br>Assessment Area: San Antonio Metropolitan |                                       |              |                                  |               |           |           |           |               |
|--------------------------------------------------------------------------------|---------------------------------------|--------------|----------------------------------|---------------|-----------|-----------|-----------|---------------|
| Community Development Purpose                                                  | Prior Period Investments <sup>1</sup> |              | Current Investments <sup>2</sup> |               | Donations |           | Total     |               |
|                                                                                | #                                     | \$(000s)     | #                                | \$(000s)      | #         | \$(000s)  | #         | \$(000s)      |
| Affordable Housing                                                             | 8                                     | 8,578        | 3                                | 9,185         | 0         | 0         | 11        | 17,763        |
| Community Services                                                             | 0                                     | 0            | 0                                | 0             | 3         | 15        | 3         | 15            |
| Economic Development                                                           | 1                                     | 665          | 2                                | 4,282         | 3         | 30        | 6         | 4,977         |
| Revitalization and Stabilization                                               | 0                                     | 0            | 0                                | 0             | 0         | 0         | 0         | 0             |
| <b>Total</b>                                                                   | <b>9</b>                              | <b>9,243</b> | <b>5</b>                         | <b>13,467</b> | <b>6</b>  | <b>45</b> | <b>20</b> | <b>22,755</b> |
| <sup>1</sup> Book value of investment                                          |                                       |              |                                  |               |           |           |           |               |
| <sup>2</sup> Original market value of investment                               |                                       |              |                                  |               |           |           |           |               |

**SERVICE TEST**

The bank's Service Test performance is good.

**Retail Services**

Comerica's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's six branch offices and six ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the income tract categories within the AA. Table 66 summarizes the bank's retail locations in the AA.

**Table 66**

| Branch and Full-Service ATM Locations<br>Assessment Area: San Antonio Metropolitan |                     |                    |                    |          |              |                   |              |
|------------------------------------------------------------------------------------|---------------------|--------------------|--------------------|----------|--------------|-------------------|--------------|
| Tract<br>Income                                                                    | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches |              | Full-Service ATMs |              |
|                                                                                    |                     |                    |                    | #        | %            | #                 | %            |
| Low                                                                                | 9.1                 | 7.1                | 6.0                | 0        | 0.0          | 0                 | 0.0          |
| Moderate                                                                           | 35.7                | 34.3               | 26.3               | 3        | 50.0         | 3                 | 50.0         |
| Middle                                                                             | 26.8                | 28.5               | 25.5               | 2        | 33.3         | 2                 | 33.3         |
| Upper                                                                              | 27.3                | 30.1               | 41.9               | 1        | 16.7         | 1                 | 16.7         |
| Unknown                                                                            | 1.0                 | 0.0                | 0.2                | 0        | 0.0          | 0                 | 0.0          |
| <b>Total</b>                                                                       | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>6</b> | <b>100.0</b> | <b>6</b>          | <b>100.0</b> |

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations do not vary the AA, particularly in LMI geographies or to LMI individuals.

### Community Development Services

The bank provides an adequate level of CD services in the AA. Comerica's employees served six organizations, offering 22 community services that aided LMI individuals for a total of 67 hours. This level of CD services represents an improvement from the previous evaluation, with an 146.3 percent increase in the number of hours rendered. Examples of services performed by bank employees include:

- Serving on the board of directors of a nonprofit that unites communities to identify and solve relevant CD issues, such as financial education and affordable housing.
- Providing over 17 hours of financial education to LMI youth.

## METROPOLITAN ASSESSMENT AREAS (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE TEXAS METROPOLITAN ASSESSMENT AREAS

The bank's branch operations and deposit market share for each metropolitan AA receiving a limited-scope review were determined as of April 1, 2023, and June 30, 2022, respectively.

- **Austin Metropolitan AA**

- The Austin Metropolitan AA is comprised of the entirety of Travis and Williamson counties which, along with Bastrop, Caldwell, and Hays counties (excluded from the AA) make up the Austin-Round Rock-Georgetown, TX MSA.
- The AA is comprised of 425 census tracts, including 27 low-, 100 moderate-, 142 middle-, 140 upper-, and 16 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 1,899,205, which reflects a 19.1 percent increase from the 2015 ACS data.
- The AA includes 416,236 families, 20.4 percent are low-, 16.8 percent moderate-, 20.8 percent middle-, and 42.0 percent are upper-income.
- The bank operated ten branches, representing 2.5 percent of its branches.
- Comerica held \$1.5 billion in deposits, representing a market share of 2.2 percent and 1.9 percent of the bank's total deposits.

- **Houston Metropolitan AA**

- The Houston Metropolitan AA is comprised of the entirety of Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties which, along with Austin, Chambers, Liberty, and Waller counties (excluded from the AA) make up the Houston-The Woodlands-Sugarland, TX MSA.
- The AA is comprised of 1,562 census tracts, including 215 low-, 385 moderate-, 408 middle-, 505 upper-, and 49 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 6,897,080, which reflects a 12.0 percent increase from the 2015 ACS data.
- The AA includes 1,650,859 families, 23.6 percent of which are low-, 16.6 percent moderate-, 17.8 percent middle-, and 42.0 percent are upper-income.
- The bank operated 41 branches, representing 10.0 percent of its branches.
- Comerica held \$3.9 billion in deposits, representing a market share of 1.0 percent and 5.3 percent of the bank's total deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix D contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 67 discusses conclusions regarding the bank's performance.

**Table 67**

| Assessment Area         | Lending Test | Investment Test | Service Test |
|-------------------------|--------------|-----------------|--------------|
| Austin Metropolitan AA  | Consistent   | Below           | Consistent   |
| Houston Metropolitan AA | Consistent   | Consistent      | Consistent   |

The institution's lending, investment, and service performance in the areas is generally consistent with Comerica's lending, investment, and service performance in the state.



## NONMETROPOLITAN ASSESSMENT AREA (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF OPERATIONS

- **Bank of the Hills Nonmetropolitan AA**
  - The Bank of the Hills Nonmetropolitan AA is comprised of the entirety of Kerr County.
  - The AA is comprised of 14 census tracts, including two moderate-, six middle-, and six upper-income tracts.
  - Based upon 2020 ACS data, the AA population was 52,598, which reflects a 4.9 percent increase from the 2015 ACS data.
  - The AA includes 14,712 families, 17.6 percent are low-, 17.8 percent moderate-, 19.0 percent middle-, and 45.6 percent are upper-income.
  - As of April 1, 2023, the bank operated three branches, representing 0.7 percent of its branches.
  - As of June 30, 2022, Comerica held \$193.2 million in deposits, representing a market share of 10.7 percent and 0.3 percent of the bank's total deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix E contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 68 summarized the conclusions regarding the bank's performance.

**Table 68**

| Assessment Area                      | Lending Test | Investment Test | Service Test |
|--------------------------------------|--------------|-----------------|--------------|
| Bank of the Hills Nonmetropolitan AA | Below        | Below           | Below        |

The institution's lending, investment, and service performance in the AA is below Comerica's performance in the state; however, it does not affect the rating for the state.

## STATE OF CALIFORNIA

|                                   |                     |
|-----------------------------------|---------------------|
| <b>CRA RATING FOR CALIFORNIA:</b> | <b>Satisfactory</b> |
| The Lending Test is Rated:        | High Satisfactory   |
| The Investment Test is Rated:     | Outstanding         |
| The Service Test is Rated:        | High Satisfactory   |

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to the AAs credit needs.
- The geographic distribution of loans reflects good penetration throughout the AAs.
- The distribution of loans among individuals of different income levels and businesses of different revenue sizes is adequate.
- Comerica is a leader in making CD loans.
- The bank has a good record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants.
- The bank makes occasional use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.
- Delivery systems are reasonably accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

## SCOPE OF THE EVALUATION

The scope of the review for the state of California is consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Three of the eight AAs in the state of California were reviewed using full-scope procedures.

- Greater Los Angeles AA
- Salinas MSA AA
- San Jose Metropolitan AA

The remaining five AAs received limited-scope reviews.

- Inland Empire MSA AA
- San Diego MSA AA
- San Francisco Bay Metropolitan AA
- Santa Cruz MSA AA
- Ventura MSA AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA last received a full-scope review. Overall, approximately 58.8 percent of the bank's lending activity by number of loans, 62.5 percent of the total deposits, and 56.5 percent of total branches within the state of California were evaluated through the full-scope reviews. The bank's performance in the Greater Los Angeles AA was given greater consideration as it is a strategic focus of the institution and represents the majority of the bank's activity in the state. The Salinas MSA AA was given the least consideration based upon the AA's size and the bank's limited presence and activity in the AA relative to other full-scope AAs.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CALIFORNIA**

The bank delineates eight of its 27 AAs and operates 92 of its 409 branches in the state of California. As of June 30, 2022, the bank had approximately \$25.2 billion in deposits in the state, representing 32.8 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 1.2 percent and ranked 13<sup>th</sup> out of 183 FDIC-insured financial institutions across the state.

Of the 20,205 HMDA-reportable loans and 35,231 small business loans originated and purchased by Comerica during the review period, 7,520 HMDA-reportable loans (37.2 percent) and 7,193 small business loans (20.4 percent) were extended in the California AAs.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's lending test performance in the state of California is High Satisfactory. The lending test conclusions in the Greater Los Angeles MSA and San Jose Metropolitan AAs are considered good, which is consistent with the overall state rating, while the Lending Test conclusion in the Salinas Metropolitan AA is adequate. Overall, Comerica's performance in the AAs receiving limited-scope reviews support the state rating.

### **Lending Activity**

The bank's lending activities in the state of California reflect good responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 5,026 SBA loans and 1,266 small business micro loans within the state of California.

As outlined in Table 69, this evaluation considered 14,887 loans totaling \$4.4 billion. The loan products and origination volumes appear consistent with the credit needs of the bank's California AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders in the area during the review period. The bank ranked 38<sup>th</sup> out of 353 CRA reporters in its California AAs and 53<sup>rd</sup> of 1,035 HMDA reporters.

**Table 69**

| <b>Summary of Lending Activity – January 1, 2020 through December 31, 2022<br/>California Assessment Areas</b> |               |              |                  |              |
|----------------------------------------------------------------------------------------------------------------|---------------|--------------|------------------|--------------|
| <b>Loan Type</b>                                                                                               | <b>#</b>      | <b>%</b>     | <b>\$000s</b>    | <b>%</b>     |
| Home Purchase                                                                                                  | 304           | 2.0          | 211,861          | 4.8          |
| Refinancing                                                                                                    | 1,535         | 10.3         | 848,692          | 19.3         |
| Home Improvement                                                                                               | 3,675         | 24.7         | 833,452          | 18.9         |
| Multifamily                                                                                                    | 29            | 0.2          | 404,131          | 9.2          |
| Other Purpose Lines of Credit                                                                                  | 1,932         | 13.0         | 514,044          | 11.7         |
| Other Purpose Closed-End/Exempt                                                                                | 45            | 0.3          | 122,896          | 2.8          |
| <b>Total HMDA-Related</b>                                                                                      | <b>7,520</b>  | <b>50.5</b>  | <b>2,935,076</b> | <b>66.7</b>  |
| <b>Total Small Business</b>                                                                                    | <b>7,193</b>  | <b>48.3</b>  | <b>1,451,923</b> | <b>33.0</b>  |
| <b>Total Small Farm</b>                                                                                        | <b>174</b>    | <b>1.2</b>   | <b>14,796</b>    | <b>0.3</b>   |
| <b>TOTAL LOANS</b>                                                                                             | <b>14,887</b> | <b>100.0</b> | <b>4,401,795</b> | <b>100.0</b> |

### ***Geographic Distribution of Loans***

The overall geographic distribution of lending within the state of California reflects good penetration throughout the bank's AAs. This performance is consistent across the bank's Greater Los Angeles and San Jose Metropolitan AAs, while the geographic distribution of lending in the Salinas Metropolitan AA is adequate.

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's overall lending reflects adequate penetration among individuals of different income levels and businesses of different sizes. This performance is consistent across the bank's Greater Los Angeles, Salinas Metropolitan, and San Jose Metropolitan AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### ***Community Development Lending***

The bank is a leader in making CD loans in the state of California. As reflected in Table 70, the bank originated 361 CD loans totaling approximately \$1.9 billion within the state, which comprises 26.8 percent of overall bank-wide CD loan volume by number and 35.0 percent by dollar amount. The level of CD lending was excellent in the Greater Los Angeles MSA AA, adequate in the Salinas MSA AA, and good in the San Jose Metropolitan AA. Additionally, it is noted that approximately 30 percent of the bank's CD lending occurred in the California AAs that received a limited-scope review at this evaluation.

The bank's total California CD loans increased notably since the previous evaluation. Overall, the number of qualified loans grew by 36.7 percent since the previous evaluation, while the dollar amount of CD lending grew by more than 233.3 percent. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which made up approximately half of the bank's CD loans during the previous evaluation period.

CD loans originated by the bank during the evaluation period were extended for a variety of purposes, as noted in the table below. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 70**

| <b>Community Development Lending<br/>California Assessment Areas</b> |            |                  |
|----------------------------------------------------------------------|------------|------------------|
| <b>Purpose</b>                                                       | <b>#</b>   | <b>\$(000s)</b>  |
| Affordable Housing                                                   | 57         | 215,347          |
| Community Services                                                   | 36         | 97,208           |
| Economic Development                                                 | 223        | 1,521,675        |
| Revitalization and Stabilization                                     | 45         | 36,061           |
| <b>Total</b>                                                         | <b>361</b> | <b>1,870,291</b> |

## INVESTMENT TEST

The bank's performance under the Investment Test in the state of California is Outstanding. The investment test conclusions in the bank's Greater Los Angeles MSA AA are considered excellent, which is consistent with the overall state rating. In the bank's San Jose Metropolitan AA, the bank's performance is good, and in the Salinas MSA AA, the bank's investment test performance is adequate. Generally, the bank's performance in its AAs that received limited-scope reviews is consistent with the overall performance in the state of California.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. While Comerica makes occasional use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs. As illustrated in Table 71, the bank maintains an increased balance of prior period investments, the substantial majority of which are comprised of Low-Income Housing Tax Credit funds, compared to current period investments. While the level of the bank's CD investments and donations to area organizations that support community services for LMI individuals represent a smaller dollar amount, the breadth of impact reflects favorably on the bank's responsiveness to this category of CD needs. In the state of California, the bank made qualifying CD donations to more than 140 distinct community organizations across its delineated AAs, each of which serves a unique subset of individuals and extending the reach of the bank's CD funds.

Details regarding investments and donations in each of the bank's California AAs can be found in the Conclusions with Respect to Performance Tests section for each AA. In addition to the investments made within the bank's delineated AAs, the bank also made several investments in the broader statewide or regional area. These investments included, notably, more than \$5 million worth of deposits in minority-owned financial institutions serving the region.

**Table 71**

| <b>Investments, Grants, and Donations<br/>California Assessment Areas</b> |                                             |                 |                                        |                 |                  |                 |              |                 |
|---------------------------------------------------------------------------|---------------------------------------------|-----------------|----------------------------------------|-----------------|------------------|-----------------|--------------|-----------------|
| <b>Community Development Purpose</b>                                      | <b>Prior Period Investments<sup>1</sup></b> |                 | <b>Current Investments<sup>2</sup></b> |                 | <b>Donations</b> |                 | <b>Total</b> |                 |
|                                                                           | <b>#</b>                                    | <b>\$(000s)</b> | <b>#</b>                               | <b>\$(000s)</b> | <b>#</b>         | <b>\$(000s)</b> | <b>#</b>     | <b>\$(000s)</b> |
| Affordable Housing                                                        | 157                                         | 114,910         | 27                                     | 101,200         | 20               | 265             | 204          | 216,375         |
| Community Services                                                        | 0                                           | 0               | 0                                      | 0               | 200              | 2,629           | 200          | 2,629           |
| Economic Development                                                      | 1                                           | 19              | 13                                     | 16,748          | 52               | 1,327           | 66           | 18,094          |
| Revitalization and Stabilization                                          | 0                                           | 0               | 0                                      | 0               | 0                | 0               | 0            | 0               |
| <b>Total</b>                                                              | <b>158</b>                                  | <b>114,929</b>  | <b>40</b>                              | <b>117,948</b>  | <b>272</b>       | <b>4,221</b>    | <b>470</b>   | <b>237,098</b>  |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

**SERVICE TEST**

The bank's performance under the Service Test in the state of California is High Satisfactory. While the Service Test conclusion in the Greater Los Angeles MSA is excellent, Comerica's performance in the Salinas MSA and the San Jose Metropolitan AAs are good, which is consistent with the overall state rating. Generally, the bank's performance in its AAs that received limited-scope reviews is consistent with the performance in the full-scope review areas and the state.

**Retail Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the bank's 92 full-service offices in the state of California, 17 are located in LMI tracts. Additionally, the bank operates 22 of its 108 full-service ATMs in LMI tracts. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals.

Refer to Table 72 below for the distribution of California banking offices and full-service ATMs by income level of geographies.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. The bank's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

**Table 72**

| <b>Branch and Full-Service ATM Locations<br/>California Assessment Areas</b> |                             |                            |                            |                 |              |                          |              |
|------------------------------------------------------------------------------|-----------------------------|----------------------------|----------------------------|-----------------|--------------|--------------------------|--------------|
| <b>Tract<br/>Income</b>                                                      | <b>% of<br/>Geographies</b> | <b>% of<br/>Households</b> | <b>% of<br/>Businesses</b> | <b>Branches</b> |              | <b>Full-Service ATMs</b> |              |
|                                                                              |                             |                            |                            | <b>#</b>        | <b>%</b>     | <b>#</b>                 | <b>%</b>     |
| Low                                                                          | 6.2                         | 5.3                        | 4.0                        | 2               | 2.2          | 2                        | 1.9          |
| Moderate                                                                     | 25.9                        | 24.4                       | 19.2                       | 15              | 16.3         | 20                       | 18.5         |
| Middle                                                                       | 32.9                        | 33.9                       | 31.7                       | 32              | 34.8         | 39                       | 36.1         |
| Upper                                                                        | 32.7                        | 35.3                       | 42.9                       | 41              | 44.6         | 45                       | 41.7         |
| Unknown                                                                      | 2.3                         | 1.1                        | 2.2                        | 2               | 2.1          | 2                        | 1.8          |
| <b>Total</b>                                                                 | <b>100.0</b>                | <b>100.0</b>               | <b>100.0</b>               | <b>92</b>       | <b>100.0</b> | <b>108</b>               | <b>100.0</b> |

**Community Development Services**

The bank provides a relatively high level of CD services in its California AAs. This conclusion is consistent across all California AAs. Bank representatives provided 1,199 CD services, totaling 3,880 hours, to 122 unique organizations within the state of California. This represents approximately 17.1 percent of the bank's total CD services, while 14.6 percent of the bank's 7,382 employees are located in California. Details regarding CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.

**GREATER LOS ANGELES MSA ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE GREATER LOS ANGELES MSA ASSESSMENT AREA**

- The bank's Greater Los Angeles MSA AA consists of the entirety of the Los Angeles-Long Beach-Anaheim, CA MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is made up of 3,112 census tracts, of which 5.7 percent are designated as low-income, 27.5 percent are moderate-income, 29.8 percent are middle-income, 34.4 percent are upper-income, and 2.6 percent are designated as unknown-income.
- Following the 2020 U.S. Census, 183 new census tracts were drawn within the AA, representing a 6.2 percent increase. Additionally, the income level designations of many existing census tracts changed, resulting in a reduction of LMI geographies of 5.1 percent between 2021 and 2022. It is noteworthy that the number of low-income geographies decreased by 33.1 percent.
- The bank operates 36 full-service branches in the AA, including six branches in moderate-income, ten in middle-income, 19 in upper-income census tracts, and one branch in an unknown-income tract.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 1.3 percent market share, ranking 15<sup>th</sup> out of 109 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 46<sup>th</sup> out of 881 HMDA reporters in the AA with 1,217 HMDA originations and purchases, and 42<sup>nd</sup> out of 286 CRA reporters with 549 CRA small business loans.
- Community contacts identified affordable housing, homelessness, small business lending, and small business financial literacy as credit and CD needs in the AA.

**Table 73**

| <b>Population Change</b>                                                                                            |                            |                            |                              |
|---------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|------------------------------|
| <b>Assessment Area: Greater Los Angeles MSA</b>                                                                     |                            |                            |                              |
| <b>Area</b>                                                                                                         | <b>2015<br/>Population</b> | <b>2020<br/>Population</b> | <b>Percentage<br/>Change</b> |
| Greater Los Angeles MSA AA                                                                                          | 13,154,457                 | 13,200,998                 | 0.4                          |
| Los Angeles-Long Beach-Glendale, CA MD<br><i>Los Angeles County</i>                                                 | 10,038,388                 | 10,014,009                 | -0.2                         |
| Anaheim-Santa Ana-Irvine, CA MD<br><i>Orange County</i>                                                             | 3,116,069                  | 3,186,989                  | 2.3                          |
| California                                                                                                          | 38,421,464                 | 39,538,223                 | 2.9                          |
| <i>Source: 2020 U.S. Census Bureau Decennial Census<br/>2011-2015 U.S. Census Bureau: American Community Survey</i> |                            |                            |                              |

- The AA population between 2015 and 2020 remain similar despite the overall growth noted in the state, at 2.9 percent.
- These population trends have continued, with the U.S. Census Bureau estimating a decline exceeding 3.0 percent in the city of Los Angeles of between 2020 and 2023.

**Table 74**

| <b>Median Family Income Change</b>                                                                                         |                                  |                                  |                          |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|--------------------------|
| <b>Assessment Area: Greater Los Angeles MSA</b>                                                                            |                                  |                                  |                          |
| <b>Area</b>                                                                                                                | <b>2015 Median Family Income</b> | <b>2020 Median Family Income</b> | <b>Percentage Change</b> |
| Greater Los Angeles MSA AA                                                                                                 | 74,040                           | 85,544                           | 15.5                     |
| Los Angeles-Long Beach-Glendale, CA MD<br><i>Los Angeles County</i>                                                        | 68,508                           | 80,317                           | 17.2                     |
| Anaheim-Santa Ana-Irvine, CA MD<br><i>Orange County</i>                                                                    | 93,965                           | 106,451                          | 13.3                     |
| California                                                                                                                 | 77,267                           | 89,798                           | 16.2                     |
| Source: 2011-2015 U.S. Census Bureau: American Community Survey<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |                                  |                          |
| Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.                                |                                  |                                  |                          |

- The AA MFI grew at a rate comparable to the state, with Orange County reflecting an MFI greater than \$100,000 in 2020.
- Los Angeles County has the lowest MFI between 2015 and 2020; however, it reported the largest growth at 17.2 percent.

**Table 75**

| <b>Housing Cost Burden</b>                                                                                             |                              |                        |                    |                             |                        |                   |
|------------------------------------------------------------------------------------------------------------------------|------------------------------|------------------------|--------------------|-----------------------------|------------------------|-------------------|
| <b>Assessment Area: Greater Los Angeles MSA</b>                                                                        |                              |                        |                    |                             |                        |                   |
| <b>Area</b>                                                                                                            | <b>Cost Burden – Renters</b> |                        |                    | <b>Cost Burden – Owners</b> |                        |                   |
|                                                                                                                        | <b>Low Income</b>            | <b>Moderate Income</b> | <b>All Renters</b> | <b>Low Income</b>           | <b>Moderate Income</b> | <b>All Owners</b> |
| Greater Los Angeles MSA AA                                                                                             | 81.1                         | 47.1                   | 52.7               | 66.7                        | 47.5                   | 32.7              |
| Los Angeles-Long Beach-Glendale, CA MD<br><i>Los Angeles County</i>                                                    | 80.9                         | 45.4                   | 52.8               | 68.0                        | 48.0                   | 33.7              |
| Anaheim-Santa Ana-Irvine, CA MD<br><i>Orange County</i>                                                                | 82.4                         | 53.3                   | 51.9               | 63.3                        | 46.1                   | 30.0              |
| California                                                                                                             | 80.6                         | 50.9                   | 50.0               | 65.9                        | 46.8                   | 29.5              |
| Cost burden is housing cost that equals 30 percent or more of household income.                                        |                              |                        |                    |                             |                        |                   |
| Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy |                              |                        |                    |                             |                        |                   |

- Overall, the cost burden for homeowners and renters in the AA is higher than the statewide rates for all LMI segments other than moderate-income renters, which is comparable. While housing affordability within the AA is a noted problem, this is especially true for low-income renters who face substantially greater burden than homeowners at any other level.
- The AA median housing value is \$641,000 and the median rent is \$1,625. Moreover, 45.7 percent of the housing units in the AA are owner-occupied and 48.1 percent are rental. Conversely, the state of California has more owner-occupied units, at 51.0 percent, and less rental units, at 41.3 percent.
- A community contact indicated that the AA is significantly impacted by homelessness and housing-overcrowding, which occurs when the number of occupants exceeds the capacity of the dwelling. The overcrowding issue, which is attributed to a unique combination of low-wage jobs and high-cost housing, has impacted the AA for over three decades.



**Table 76**

| <b>Unemployment Rates</b><br><b>Assessment Area: Greater Los Angeles MSA</b>  |             |             |             |             |             |
|-------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Region</b>                                                                 | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| Greater Los Angeles AA                                                        | 4.2         | 4.0         | 11.5        | 8.2         | 4.5         |
| Los Angeles-Long Beach-Glendale, CA MD<br><i>Los Angeles County</i>           | 4.6         | 4.4         | 12.3        | 8.9         | 4.9         |
| Anaheim-Santa Ana-Irvine, CA MD<br><i>Orange County</i>                       | 3.0         | 2.8         | 9.0         | 6.0         | 3.2         |
| California                                                                    | 4.3         | 4.1         | 10.2        | 7.3         | 4.2         |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> |             |             |             |             |             |

- Unemployment rates almost tripled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- A community contact noted that a substantial number of small businesses within the AA with less than 20 employees were adversely impacted by the COVID-19 pandemic.
- Major employment industries within the AA include healthcare and social assistance, professional and technical services, and retail trade.

Table 77 details selected characteristics of the AA.

Table 77

| 2022 Combined Demographics                                     |                           |                       |                                    |           |                                                    |           |                           |           |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Greater Los Angeles MSA                       |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 178                       | 5.7                   | 142,545                            | 4.8       | 39,818                                             | 27.9      | 699,400                   | 23.7      |
| Moderate                                                       | 856                       | 27.5                  | 792,186                            | 26.8      | 125,169                                            | 15.8      | 486,097                   | 16.5      |
| Middle                                                         | 926                       | 29.8                  | 905,587                            | 30.7      | 73,556                                             | 8.1       | 529,772                   | 17.9      |
| Upper                                                          | 1,071                     | 34.4                  | 1,098,658                          | 37.2      | 43,367                                             | 3.9       | 1,238,213                 | 41.9      |
| Unknown                                                        | 81                        | 2.6                   | 14,506                             | 0.5       | 1,991                                              | 13.7      | 0                         | 0.0       |
| Total AA                                                       | 3,112                     | 100.0                 | 2,953,482                          | 100.0     | 283,901                                            | 9.6       | 2,953,482                 | 100.0     |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                            | 225,201                   | 29,216                | 1.4                                | 13.0      | 183,218                                            | 81.4      | 12,767                    | 5.7       |
| Moderate                                                       | 1,184,434                 | 364,211               | 17.1                               | 30.7      | 758,418                                            | 64.0      | 61,805                    | 5.2       |
| Middle                                                         | 1,388,988                 | 672,356               | 31.6                               | 48.4      | 643,632                                            | 46.3      | 73,000                    | 5.3       |
| Upper                                                          | 1,803,716                 | 1,056,633             | 49.6                               | 58.6      | 613,113                                            | 34.0      | 133,970                   | 7.4       |
| Unknown                                                        | 58,695                    | 7,284                 | 0.3                                | 12.4      | 44,424                                             | 75.7      | 6,987                     | 11.9      |
| Total AA                                                       | 4,661,034                 | 2,129,700             | 100.0                              | 45.7      | 2,242,805                                          | 48.1      | 288,529                   | 6.2       |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 24,565                    | 3.5                   | 22,190                             | 3.4       | 2,244                                              | 4.2       | 131                       | 2.9       |
| Moderate                                                       | 137,050                   | 19.3                  | 124,054                            | 19.1      | 12,320                                             | 23.0      | 676                       | 15.1      |
| Middle                                                         | 198,587                   | 28.0                  | 181,575                            | 27.9      | 15,911                                             | 29.7      | 1,101                     | 24.6      |
| Upper                                                          | 331,000                   | 46.7                  | 308,033                            | 47.3      | 20,530                                             | 38.3      | 2,437                     | 54.4      |
| Unknown                                                        | 17,876                    | 2.5                   | 15,185                             | 2.3       | 2,560                                              | 4.8       | 131                       | 2.9       |
| Total AA                                                       | 709,078                   | 100.0                 | 651,037                            | 100.0     | 53,565                                             | 100.0     | 4,476                     | 100.0     |
| Percentage of Total Businesses:                                |                           |                       |                                    | 91.8      |                                                    | 7.6       |                           | 0.6       |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 43                        | 1.8                   | 43                                 | 1.9       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                       | 368                       | 15.4                  | 345                                | 14.9      | 23                                                 | 27.7      | 0                         | 0.0       |
| Middle                                                         | 573                       | 24.0                  | 552                                | 23.9      | 21                                                 | 25.3      | 0                         | 0.0       |
| Upper                                                          | 1,365                     | 57.1                  | 1,326                              | 57.4      | 39                                                 | 47.0      | 0                         | 0.0       |
| Unknown                                                        | 43                        | 1.8                   | 43                                 | 1.9       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                       | 2,392                     | 100.0                 | 2,309                              | 100.0     | 83                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                     |                           |                       |                                    | 96.5      |                                                    | 3.5       |                           | 0.0       |
| Source: 2022 FFIEC Census Data                                 |                           |                       |                                    |           |                                                    |           |                           |           |
| 2022 Dun & Bradstreet Data                                     |                           |                       |                                    |           |                                                    |           |                           |           |
| 2016-2020 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the Greater Los Angeles MSA AA is good. For this evaluation, the bank's home mortgage and small business lending carried equal weight, as Comerica extended a similar volume of these products during the review period. Additionally, multifamily, other purpose closed/exempt, and loan purpose not applicable lending products were not evaluated separately from the evaluation of the bank's home mortgage lending.

Details of the bank's 2020 mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the Greater Los Angeles MSA AA reflects good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending practices to serve AA credit needs, including LMI borrowers. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs. It is noteworthy that Comerica extended \$767 million through 2,252 SBA loans and 588 small business micro loans.

During the review period, the bank originated 3,357 home mortgage and 3,072 small business loans. While the number of home mortgage loans increased year after year between 2020 and 2022, the volume of small business loans decreased by 64.1 percent during the same period of time. The significant reduction in small business lending is primarily due to the conclusion of the SBA's PPP in May 2021 and rising interest rate environment. Loan products and origination volumes are consistent with the credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared to available demographic and aggregate data. Aggregate lending serves as a better proxy for loan demand than the demographic figure when evaluating the bank's geographic distribution. The bank's geographic distribution of loans reflects good penetration throughout the AA. There were no significant gaps or lapses in contiguous geographies noted.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage loans in the AA is adequate. The distribution of 2021 and 2022 home mortgage loans among low-income census tracts is comparable to aggregate data and the percentage of owner-occupied units in these tracts. The penetration of the bank's HMDA lending in moderate-income census tracts is below aggregate data and the demographic figure.

The bank's lending performance for 2020 reflected penetration levels consistent with those of 2021 and 2022, with a distribution of loans to LMI tracts that was comparable to aggregate data but below the demographic figure.

### *Home Purchase Lending*

The geographic distribution of home purchase lending is excellent. The distribution of these loans by number among low-income census tracts was above aggregate data and the demographic figure in 2021 and comparable to both data points in 2022. Distribution of home purchase loans among moderate-income census tracts was significantly above the aggregate data and the demographic figure in 2021 and 2022. The bank originated almost double the percentage of home purchase loans in moderate-income census tracts compared to the performance of aggregate data.

The bank's lending performance by number volume in 2020 reflected penetration levels consistent with 2021 and 2022 performance in LMI census tracts, though performance in 2020 by dollar amount was below the aggregate.

### *Home Refinance Lending*

The geographic distribution of home refinance lending is good. The distribution of 2021 and 2022 home refinance loans among low-income census tracts is comparable to aggregate data and the demographic figure. The penetration level of the bank's 2022 home refinance lending among moderate-income census tracts is comparable to the aggregate data and the demographic figure, while in 2021, the bank performed well above aggregate data. Opportunities for home refinance lending, particularly in low-income census tracts, were limited due to the substantial increase in interest rates in 2022.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is adequate. The distribution of home improvement loans among low-income census tracts is comparable to aggregate data and the demographic figure. The bank's performance improved between 2021 and 2022 but remained close to aggregate performance.

In moderate-income census tracts, the distribution of the bank's 2021 home improvement lending is comparable to aggregate lending performance, but below the demographic figure. The bank's performance declined slightly between 2021 and 2022, with the distribution level of 2022 home improvement loans below both the aggregate data and the demographic figure.

The bank's lending performance for 2020 reflected penetration levels consistent with 2022, with a distribution of loans to low-income tracts that was comparable to aggregate data and a distribution of loans to moderate-income tracts that was below the aggregate.

### *Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is adequate. The 2021 loan distribution among low-income census tracts is comparable to aggregate data but below the percentage of owner-occupied units in these tracts, while the 2022 loan distribution in these tracts is above aggregate data and comparable to the demographic figure. The bank's 2020 performance in low-income tracts is comparable to both aggregate and demographic data.

In moderate-income census tracts, the loan distribution is slightly below the aggregate data, with the bank's performance decreasing in 2022 after being comparable in 2020 and 2021. However, the bank's performance in the three years is below the demographic figure. Greater weight was placed on the bank's performance in comparison to aggregate lenders', as aggregate data is a better indicator of loan demand.

**Table 78A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|-------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Greater Los Angeles MSA                                         |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |       |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022  |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank  |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #     | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Low                                                                              | 2                                | 4.9   | 2.8   | 915     | 2.1   | 1.9   | 1     | 1.4   | 1.8   | 300     | 0.7   | 1.3   | 1.4                          |
| Moderate                                                                         | 11                               | 26.8  | 16.6  | 3,858   | 9.1   | 11.4  | 26    | 37.7  | 17.2  | 11,589  | 26.1  | 11.5  | 17.1                         |
| Middle                                                                           | 7                                | 17.1  | 26.4  | 4,640   | 10.9  | 20.8  | 12    | 17.4  | 30.7  | 5,890   | 13.3  | 24.1  | 31.6                         |
| Upper                                                                            | 21                               | 51.2  | 53.1  | 33,154  | 77.9  | 64.8  | 29    | 42.0  | 49.7  | 25,125  | 56.6  | 62.4  | 49.6                         |
| Unknown                                                                          | 0                                | 0.0   | 1.1   | 0       | 0.0   | 1.1   | 1     | 1.4   | 0.6   | 1,500   | 3.4   | 0.7   | 0.3                          |
| Total                                                                            | 41                               | 100.0 | 100.0 | 42,567  | 100.0 | 100.0 | 69    | 100.0 | 100.0 | 44,404  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Low                                                                              | 4                                | 2.2   | 2.4   | 949     | 1.2   | 1.8   | 0     | 0.0   | 1.7   | 0       | 0.0   | 1.3   | 1.4                          |
| Moderate                                                                         | 38                               | 20.7  | 15.9  | 11,289  | 14.1  | 11.8  | 31    | 13.1  | 17.7  | 8,661   | 8.5   | 12.0  | 17.1                         |
| Middle                                                                           | 34                               | 18.5  | 27.1  | 10,900  | 13.6  | 22.1  | 56    | 23.6  | 31.2  | 15,393  | 15.2  | 23.2  | 31.6                         |
| Upper                                                                            | 107                              | 58.2  | 54.3  | 56,505  | 70.5  | 63.8  | 149   | 62.9  | 49.0  | 74,871  | 73.8  | 63.2  | 49.6                         |
| Unknown                                                                          | 1                                | 0.5   | 0.3   | 462     | 0.6   | 0.4   | 1     | 0.4   | 0.4   | 2,516   | 2.5   | 0.4   | 0.3                          |
| Total                                                                            | 184                              | 100.0 | 100.0 | 80,105  | 100.0 | 100.0 | 237   | 100.0 | 100.0 | 101,441 | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Low                                                                              | 3                                | 0.5   | 1.4   | 250     | 0.2   | 1.3   | 8     | 1.3   | 0.7   | 1,912   | 1.4   | 0.7   | 1.4                          |
| Moderate                                                                         | 58                               | 9.7   | 11.7  | 9,559   | 7.1   | 10.0  | 46    | 7.6   | 11.1  | 7,783   | 5.5   | 8.2   | 17.1                         |
| Middle                                                                           | 126                              | 21.2  | 24.8  | 24,401  | 18.2  | 20.7  | 153   | 25.2  | 29.9  | 32,456  | 22.9  | 23.0  | 31.6                         |
| Upper                                                                            | 406                              | 68.2  | 61.8  | 98,846  | 73.8  | 67.6  | 397   | 65.5  | 58.0  | 98,967  | 70.0  | 67.8  | 49.6                         |
| Unknown                                                                          | 2                                | 0.3   | 0.3   | 800     | 0.6   | 0.4   | 2     | 0.3   | 0.3   | 332     | 0.2   | 0.4   | 0.3                          |
| Total                                                                            | 595                              | 100.0 | 100.0 | 133,856 | 100.0 | 100.0 | 606   | 100.0 | 100.0 | 141,450 | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |       |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 15.0  | 0       | 0.0   | 12.7  | 0     | 0.0   | 11.1  | 0       | 0.0   | 8.0   | 8.8                          |
| Moderate                                                                         | 1                                | 25.0  | 37.2  | 1,625   | 29.2  | 30.1  | 2     | 20.0  | 37.9  | 26,883  | 13.8  | 30.0  | 30.7                         |
| Middle                                                                           | 1                                | 25.0  | 22.1  | 1,838   | 33.0  | 27.0  | 4     | 40.0  | 24.8  | 79,014  | 40.4  | 27.7  | 27.1                         |
| Upper                                                                            | 2                                | 50.0  | 25.0  | 2,110   | 37.9  | 29.2  | 2     | 20.0  | 24.0  | 76,580  | 39.2  | 32.0  | 30.5                         |
| Unknown                                                                          | 0                                | 0.0   | 0.6   | 0       | 0.0   | 1.1   | 2     | 20.0  | 2.1   | 13,016  | 6.7   | 2.3   | 2.9                          |
| Total                                                                            | 4                                | 100.0 | 100.0 | 5,573   | 100.0 | 100.0 | 10    | 100.0 | 100.0 | 195,493 | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |       |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 12                               | 1.0   | 2.6   | 2,720   | 0.7   | 2.5   | 13    | 1.1   | 1.8   | 3,102   | 0.5   | 2.0   | 1.4                          |
| Moderate                                                                         | 133                              | 11.5  | 16.1  | 30,044  | 8.2   | 12.7  | 121   | 9.9   | 16.9  | 59,896  | 10.2  | 13.7  | 17.1                         |
| Middle                                                                           | 238                              | 20.6  | 26.7  | 57,103  | 15.6  | 21.9  | 288   | 23.7  | 30.5  | 149,399 | 25.4  | 23.7  | 31.6                         |
| Upper                                                                            | 770                              | 66.6  | 54.1  | 273,964 | 75.0  | 62.4  | 788   | 64.7  | 50.3  | 357,813 | 60.8  | 59.7  | 49.6                         |
| Unknown                                                                          | 3                                | 0.3   | 0.5   | 1,262   | 0.3   | 0.6   | 7     | 0.6   | 0.5   | 17,864  | 3.0   | 0.8   | 0.3                          |
| Total                                                                            | 1,156                            | 100.0 | 100.0 | 365,093 | 100.0 | 100.0 | 1,217 | 100.0 | 100.0 | 588,074 | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |       |       |       |         |       |       |                              |

**Table 78B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Greater Los Angeles MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                          | 3                                | 0.9   | 1.0   | 606     | 0.8   | 0.6   | 4    | 1.4   | 0.7   | 890     | 0.9   | 0.4   | 1.4                          |
| Moderate                                                                                                                     | 25                               | 7.9   | 8.5   | 3,713   | 4.8   | 5.5   | 15   | 5.2   | 9.9   | 4,333   | 4.6   | 5.9   | 17.1                         |
| Middle                                                                                                                       | 69                               | 21.7  | 21.3  | 14,324  | 18.6  | 15.0  | 63   | 21.7  | 27.5  | 16,646  | 17.6  | 19.3  | 31.6                         |
| Upper                                                                                                                        | 221                              | 69.5  | 68.9  | 58,284  | 75.8  | 78.4  | 207  | 71.4  | 61.8  | 72,115  | 76.3  | 74.1  | 49.6                         |
| Unknown                                                                                                                      | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.4   | 1    | 0.3   | 0.2   | 500     | 0.5   | 0.2   | 0.3                          |
| Total                                                                                                                        | 318                              | 100.0 | 100.0 | 76,927  | 100.0 | 100.0 | 290  | 100.0 | 100.0 | 94,484  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                          | 0                                | 0.0   | 1.7   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.3   | 1.4                          |
| Moderate                                                                                                                     | 0                                | 0.0   | 12.3  | 0       | 0.0   | 4.3   | 1    | 20.0  | 12.4  | 647     | 6.0   | 3.9   | 17.1                         |
| Middle                                                                                                                       | 1                                | 7.1   | 21.8  | 1,000   | 3.8   | 9.0   | 0    | 0.0   | 25.1  | 0       | 0.0   | 9.4   | 31.6                         |
| Upper                                                                                                                        | 13                               | 92.9  | 63.8  | 25,065  | 96.2  | 85.7  | 4    | 80.0  | 61.3  | 10,155  | 94.0  | 85.9  | 49.6                         |
| Unknown                                                                                                                      | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0.3                          |
| Total                                                                                                                        | 14                               | 100.0 | 100.0 | 26,065  | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 10,802  | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                          | 0                                | 0.0   | 5.7   | 0       | 0.0   | 4.2   | 0    | 0.0   | 2.9   | 0       | 0.0   | 1.8   | 1.4                          |
| Moderate                                                                                                                     | 0                                | 0.0   | 29.3  | 0       | 0.0   | 20.7  | 0    | 0.0   | 31.0  | 0       | 0.0   | 41.6  | 17.1                         |
| Middle                                                                                                                       | 0                                | 0.0   | 31.6  | 0       | 0.0   | 35.1  | 0    | 0.0   | 36.3  | 0       | 0.0   | 27.4  | 31.6                         |
| Upper                                                                                                                        | 0                                | 0.0   | 33.3  | 0       | 0.0   | 39.8  | 0    | 0.0   | 29.6  | 0       | 0.0   | 29.1  | 49.6                         |
| Unknown                                                                                                                      | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0.3                          |
| Total                                                                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the Greater Los Angeles MSA AA. The distribution of 2022 small business loans among LMI census tracts are above aggregate data and the percentage of businesses located in these tracts. While the 2021 lending in low-income census tracts mirrors the 2022 performance, the lending in moderate-income census tracts is comparable to aggregate data and the demographic figure.

The bank's lending performance for 2020 reflected penetration levels that were below 2021 and 2022 performance, with distribution among low-income census tracts comparable to aggregate data and the demographic figure, and distribution among moderate-income census tracts below both metrics. The improvement in the bank's performance in LMI geographies in 2021 and 2022 is attributed to Comerica's strategic focus on leveraging its commercial lending expertise to meet the needs of small businesses in the AA even through interest rates hikes.

**Table 79**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Greater Los Angeles MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                               | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                               | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                               | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                           | 70                               | 7.1   | 4.8   | 15,050  | 7.2   | 5.4   | 27   | 4.9   | 3.3   | 5,527   | 3.9   | 3.9   | 3.5                      |
| Moderate                                                                                                                      | 163                              | 16.4  | 19.9  | 36,739  | 17.7  | 20.6  | 134  | 24.4  | 19.9  | 31,190  | 22.0  | 21.1  | 19.3                     |
| Middle                                                                                                                        | 248                              | 25.0  | 25.4  | 60,353  | 29.0  | 27.0  | 186  | 33.9  | 28.5  | 47,400  | 33.4  | 28.2  | 28.0                     |
| Upper                                                                                                                         | 482                              | 48.6  | 48.1  | 88,950  | 42.8  | 44.2  | 181  | 33.0  | 45.9  | 51,018  | 36.0  | 43.3  | 46.7                     |
| Unknown                                                                                                                       | 29                               | 2.9   | 1.5   | 6,836   | 3.3   | 2.7   | 21   | 3.8   | 2.2   | 6,610   | 4.7   | 3.4   | 2.5                      |
| Total                                                                                                                         | 992                              | 100.0 | 100.0 | 207,928 | 100.0 | 100.0 | 549  | 100.0 | 100.0 | 141,745 | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels and businesses of different sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the Greater Los Angeles MSA AA is adequate. The bank's 2021 and 2022 lending to LMI borrowers is slightly below aggregate data and well below the demographic figure. The bank's lending performance in 2020 is consistent with that of 2021 and 2022.

The bank's performance decreased slightly in 2022, coinciding with hikes in interest rates which made mortgage loans more expensive. Additionally, 2022 median housing values were substantially higher than the national median values, further exacerbating difficulties faced by lower-income borrowers in qualifying for mortgage loans. As a result, neither then bank's performance nor aggregate data aligns with the demographic figures.



**Table 80A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Greater Los Angeles MSA |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|-------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                              | Bank and Aggregate Loans by Year |       |       |         |       |       |       |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                          | 2021                             |       |       |         |       |       | 2022  |       |       |         |       |       |                                   |
|                                                                                                                          | Bank                             |       | Agg   | Bank    |       | Agg   | Bank  |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                          | #                                | %     | %     | \$(000) | %     | %     | #     | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                      |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                      | 0                                | 0.0   | 1.9   | 0       | 0.0   | 1.2   | 1     | 1.4   | 1.4   | 772     | 1.7   | 1.0   | 23.7                              |
| Moderate                                                                                                                 | 3                                | 7.3   | 4.3   | 627     | 1.5   | 1.9   | 2     | 2.9   | 3.6   | 1,128   | 2.5   | 1.4   | 16.5                              |
| Middle                                                                                                                   | 5                                | 12.2  | 13.6  | 1,826   | 4.3   | 8.3   | 12    | 17.4  | 12.0  | 4,483   | 10.1  | 6.8   | 17.9                              |
| Upper                                                                                                                    | 28                               | 68.3  | 63.5  | 21,432  | 50.3  | 72.0  | 53    | 76.8  | 63.4  | 36,521  | 82.2  | 71.0  | 41.9                              |
| Unknown                                                                                                                  | 5                                | 12.2  | 16.8  | 18,682  | 43.9  | 16.7  | 1     | 1.4   | 19.6  | 1,500   | 3.4   | 19.8  | 0.0                               |
| Total                                                                                                                    | 41                               | 100.0 | 100.0 | 42,567  | 100.0 | 100.0 | 69    | 100.0 | 100.0 | 44,404  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                          |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                      | 6                                | 3.3   | 3.4   | 1,282   | 1.6   | 2.1   | 3     | 1.3   | 7.6   | 451     | 0.4   | 5.2   | 23.7                              |
| Moderate                                                                                                                 | 20                               | 10.9  | 9.0   | 4,192   | 5.2   | 5.3   | 15    | 6.3   | 11.4  | 4,124   | 4.1   | 6.1   | 16.5                              |
| Middle                                                                                                                   | 22                               | 12.0  | 17.8  | 6,256   | 7.8   | 13.2  | 29    | 12.2  | 18.3  | 6,766   | 6.7   | 12.2  | 17.9                              |
| Upper                                                                                                                    | 130                              | 70.7  | 53.2  | 55,971  | 69.9  | 62.7  | 181   | 76.4  | 47.0  | 69,716  | 68.7  | 57.6  | 41.9                              |
| Unknown                                                                                                                  | 6                                | 3.3   | 16.5  | 12,404  | 15.5  | 16.8  | 9     | 3.8   | 15.7  | 20,384  | 20.1  | 18.9  | 0.0                               |
| Total                                                                                                                    | 184                              | 100.0 | 100.0 | 80,105  | 100.0 | 100.0 | 237   | 100.0 | 100.0 | 101,441 | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                   |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                      | 3                                | 0.5   | 4.5   | 301     | 0.2   | 3.8   | 5     | 0.8   | 2.5   | 375     | 0.3   | 2.6   | 23.7                              |
| Moderate                                                                                                                 | 13                               | 2.2   | 5.9   | 1,196   | 0.9   | 4.2   | 17    | 2.8   | 6.6   | 2,219   | 1.6   | 3.7   | 16.5                              |
| Middle                                                                                                                   | 58                               | 9.7   | 14.2  | 7,790   | 5.8   | 10.7  | 65    | 10.7  | 16.7  | 9,642   | 6.8   | 10.8  | 17.9                              |
| Upper                                                                                                                    | 513                              | 86.2  | 69.0  | 119,649 | 89.4  | 69.5  | 511   | 84.3  | 68.4  | 126,954 | 89.8  | 74.0  | 41.9                              |
| Unknown                                                                                                                  | 8                                | 1.3   | 6.5   | 4,920   | 3.7   | 11.9  | 8     | 1.3   | 5.8   | 2,260   | 1.6   | 8.9   | 0.0                               |
| Total                                                                                                                    | 595                              | 100.0 | 100.0 | 133,856 | 100.0 | 100.0 | 606   | 100.0 | 100.0 | 141,450 | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Low                                                                                                                      | 13                               | 1.1   | 3.1   | 4,949   | 1.4   | 1.9   | 12    | 1.0   | 4.4   | 1,962   | 0.5   | 2.8   | 23.7                              |
| Moderate                                                                                                                 | 44                               | 3.8   | 7.8   | 7,790   | 2.2   | 4.2   | 40    | 3.3   | 7.4   | 8,408   | 2.1   | 3.4   | 16.5                              |
| Middle                                                                                                                   | 121                              | 10.5  | 16.6  | 20,990  | 5.8   | 11.5  | 123   | 10.2  | 15.3  | 23,983  | 6.1   | 9.0   | 17.9                              |
| Upper                                                                                                                    | 952                              | 82.6  | 55.9  | 286,085 | 79.6  | 65.4  | 1,006 | 83.3  | 56.6  | 307,994 | 78.5  | 65.5  | 41.9                              |
| Unknown                                                                                                                  | 22                               | 1.9   | 16.4  | 39,706  | 11.0  | 16.9  | 26    | 2.2   | 16.3  | 50,234  | 12.8  | 19.2  | 0.0                               |
| Total                                                                                                                    | 1,152                            | 100.0 | 100.0 | 359,520 | 100.0 | 100.0 | 1,207 | 100.0 | 100.0 | 392,581 | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                           |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                  |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                           |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                |                                  |       |       |         |       |       |       |       |       |         |       |       |                                   |

**Table 80B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Greater Los Angeles MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                              | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                          | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                          | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                          | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                      | 3                                | 0.9   | 4.0   | 566     | 0.7   | 4.7   | 3    | 1.0   | 2.4   | 364     | 0.4   | 2.7   | 23.7                              |
| Moderate                                                                                                                 | 7                                | 2.2   | 4.1   | 775     | 1.0   | 2.3   | 6    | 2.1   | 5.1   | 937     | 1.0   | 2.4   | 16.5                              |
| Middle                                                                                                                   | 36                               | 11.3  | 11.3  | 5,118   | 6.7   | 5.9   | 17   | 5.9   | 14.7  | 3,092   | 3.3   | 7.6   | 17.9                              |
| Upper                                                                                                                    | 270                              | 84.9  | 73.7  | 68,343  | 88.8  | 76.5  | 258  | 89.0  | 68.2  | 72,076  | 76.3  | 75.5  | 41.9                              |
| Unknown                                                                                                                  | 2                                | 0.6   | 7.0   | 2,125   | 2.8   | 10.6  | 6    | 2.1   | 9.5   | 18,015  | 19.1  | 11.9  | 0.0                               |
| Total                                                                                                                    | 318                              | 100.0 | 100.0 | 76,927  | 100.0 | 100.0 | 290  | 100.0 | 100.0 | 94,484  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                      | 1                                | 7.1   | 5.4   | 2,800   | 10.7  | 2.5   | 0    | 0.0   | 6.5   | 0       | 0.0   | 3.3   | 23.7                              |
| Moderate                                                                                                                 | 1                                | 7.1   | 7.8   | 1,000   | 3.8   | 2.3   | 0    | 0.0   | 7.4   | 0       | 0.0   | 2.3   | 16.5                              |
| Middle                                                                                                                   | 0                                | 0.0   | 12.5  | 0       | 0.0   | 5.7   | 0    | 0.0   | 13.2  | 0       | 0.0   | 3.4   | 17.9                              |
| Upper                                                                                                                    | 11                               | 78.6  | 62.2  | 20,690  | 79.4  | 67.5  | 3    | 60.0  | 58.9  | 2,727   | 25.2  | 67.0  | 41.9                              |
| Unknown                                                                                                                  | 1                                | 7.1   | 12.1  | 1,575   | 6.0   | 22.0  | 2    | 40.0  | 13.9  | 8,075   | 74.8  | 24.1  | 0.0                               |
| Total                                                                                                                    | 14                               | 100.0 | 100.0 | 26,065  | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 10,802  | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                      | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 23.7                              |
| Moderate                                                                                                                 | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.2   | 16.5                              |
| Middle                                                                                                                   | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 17.9                              |
| Upper                                                                                                                    | 0                                | 0.0   | 0.7   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 41.9                              |
| Unknown                                                                                                                  | 0                                | 0.0   | 98.3  | 0       | 0.0   | 99.4  | 0    | 0.0   | 99.2  | 0       | 0.0   | 99.8  | 0.0                               |
| Total                                                                                                                    | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's borrower distribution of small business loans to businesses of different revenue size is adequate. The 2021 and 2022 loan distribution to businesses with annual revenues of \$1 million or less by volume of originations is below the aggregate data and significantly below the percentage of small businesses in the AA. Though the percentage of originations to small businesses in 2021 was below aggregate, the dollar amount of loans was comparable to aggregate data, which is reflective of Comerica's willingness to lend larger sums to small businesses.

The bank's lending performance in 2020 reflected penetrations levels greater than 2021 and 2022, originating a larger portion to businesses with revenues of \$1 million or less than aggregate lenders. Comerica's originations of small business loans decline year after year between 2020 and 2022, as well as the volume of originations to borrowers with unknown revenue. The decline in small business loan originations is partly attributed to the rise of interest rates.

**Table 81**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Greater Los Angeles MSA                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 368                              | 37.1  | 45.3  | 51,015  | 24.5  | 23.6  | 168  | 30.6  | 51.9  | 24,722  | 17.4  | 32.6  | 91.8                     |
| Over \$1 Million                                                                   | 361                              | 36.4  |       | 125,437 | 60.3  |       | 288  | 52.5  |       | 101,296 | 71.5  |       | 7.6                      |
| Revenue Unknown                                                                    | 263                              | 26.5  |       | 31,476  | 15.1  |       | 93   | 16.9  |       | 15,727  | 11.1  |       | 0.6                      |
| Total                                                                              | 992                              | 100.0 |       | 207,928 | 100.0 |       | 549  | 100.0 |       | 141,745 | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 520                              | 52.4  | 93.8  | 22,432  | 10.8  | 41.5  | 236  | 43.0  | 96.2  | 12,508  | 8.8   | 51.1  |                          |
| \$100,001 - \$250,000                                                              | 225                              | 22.7  | 3.6   | 40,441  | 19.4  | 17.2  | 140  | 25.5  | 2.2   | 28,167  | 19.9  | 14.0  |                          |
| \$250,001 - \$1 Million                                                            | 247                              | 24.9  | 2.6   | 145,055 | 69.8  | 41.3  | 173  | 31.5  | 1.6   | 101,070 | 71.3  | 34.9  |                          |
| Total                                                                              | 992                              | 100.0 | 100.0 | 207,928 | 100.0 | 100.0 | 549  | 100.0 | 100.0 | 141,745 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 238                              | 64.7  |       | 9,689   | 19.0  |       | 105  | 62.5  |       | 4,764   | 19.3  |       |                          |
| \$100,001 - \$250,000                                                              | 83                               | 22.6  |       | 14,328  | 28.1  |       | 36   | 21.4  |       | 7,240   | 29.3  |       |                          |
| \$250,001 - \$1 Million                                                            | 47                               | 12.8  |       | 26,998  | 52.9  |       | 27   | 16.1  |       | 12,718  | 51.4  |       |                          |
| Total                                                                              | 368                              | 100.0 |       | 51,015  | 100.0 |       | 168  | 100.0 |       | 24,722  | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

## Community Development Lending

The bank is a leader in making CD loans in the AA. During the review period, Comerica originated 166 CD loans totaling \$1.1 billion in the Greater Los Angeles MSA AA, making up 12.3 percent of bank-wide CD loan volume by number and 19.9 percent by dollar amount. The number and dollar amount of CD loans originated in the AA increased significantly by 45.6 percent and 330.0 percent, respectively, since the previous evaluation. Despite the substantial decrease in loans originated through the SBA's PPP since the prior evaluation, this substantive increase in number and dollar amount is reflective of the bank's focus on identifying CD opportunities and being responsive through qualified activities.

The largest portion of the bank's CD lending in the AA is comprised of loans that promote economic development by financing small businesses and supporting permanent job creation, retention, or improvement for LMI persons or in LMI geographies. Examples of the bank's CD lending activities that are responsive to the AA credit needs include:

- A \$60 million line of credit to an apparel manufacturer, providing for the retention and improvement of more than 300 LMI jobs.
- A \$25 million line of credit to the largest after-school program in southern California, which delivers nationally recognized expanded learning and school improvement programs through more than 400 schools to over 200,000 students, 80 percent of which are LMI.
- A \$17 million loan for the construction of 53 studio apartments serving special needs, homeless veterans, and chronically homeless individuals. The program serves low-income individuals, earning less than 30 percent of the area median income, providing a full range of supportive services including employment training, educational services, and

transportation. This loan was originated in conjunction with a LIHTC investment provided by the bank, increasing the overall financial commitment. This loan particularly reflects favorably on the bank, as community contacts noted housing over-crowding and housing affordability as a significant need in the AA.

- Twenty-five loans totaling \$20.9 million originated through the SBA's PPP in response to the ongoing effects of the COVID-19 pandemic, which continued to impact the nation during the early portion of the review period for this evaluation.

**Table 82**

| <b>Community Development Lending</b>            |            |                  |
|-------------------------------------------------|------------|------------------|
| <b>Assessment Area: Greater Los Angeles MSA</b> |            |                  |
| <b>Purpose</b>                                  | <b>#</b>   | <b>\$000s</b>    |
| Affordable Housing                              | 34         | 115,123          |
| Community Services                              | 3          | 27,768           |
| Economic Development                            | 104        | 898,231          |
| Revitalization and Stabilization                | 25         | 20,914           |
| <b>Total</b>                                    | <b>166</b> | <b>1,062,036</b> |

## INVESTMENT TEST

Comerica's performance under the Investment Test in the Greater Los Angeles MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, which often positions it as a leader in the AA. Since the prior evaluation, the dollar amount of CD investments and grants made in the AA has increased by 30.4 percent despite the number of individual investments and grants decreasing by 43.4 percent. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the AA credit and CD needs.

Table 83 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. Examples of CD investment and donation activities include:

- A \$2 million investment in a small business investment company, with funds targeted to serve low-income communities within the bank's Greater Los Angeles MSA AA, as well as women- and minority-owned small businesses. This investment reflects favorably on the bank, as a community contact noted a need for financial institutions to invest in intermediaries who extend loans to eligible small businesses.
- A \$500,000 investment in a business development center serving the AA through flexible business solutions including targeted education and small business loan programs.
- A \$7.5 million LIHTC investment in the construction of 53 studio apartments serving special needs, homeless veterans and chronically homeless individuals, a project for which the bank also provided a \$17 million loan.
- Three recurring donations totaling \$300,000 to a local organization's Emergency Economic Fund and Workforce Emergency Response Fund. The economic fund provides food vouchers, housing support, and technology to the most vulnerable AA families, while the workforce fund provides direct training to low-income workers who were negatively impacted by the COVID-19 pandemic.

**Table 83**

| Investment, Grants, and Donations<br>Assessment Area: Greater Los Angeles MSA |                                       |               |                                  |               |            |              |            |               |
|-------------------------------------------------------------------------------|---------------------------------------|---------------|----------------------------------|---------------|------------|--------------|------------|---------------|
| Community Development Purpose                                                 | Prior Period Investments <sup>1</sup> |               | Current Investments <sup>2</sup> |               | Donations  |              | Total      |               |
|                                                                               | #                                     | \$(000s)      | #                                | \$(000s)      | #          | \$(000s)     | #          | \$(000s)      |
| Affordable Housing                                                            | 38                                    | 33,017        | 8                                | 35,210        | 9          | 90           | 55         | 68,317        |
| Community Services                                                            | 0                                     | 0             | 0                                | 0             | 104        | 1,431        | 104        | 1,431         |
| Economic Development                                                          | 1                                     | 19            | 6                                | 8,829         | 27         | 766          | 34         | 9,614         |
| Revitalization and Stabilization                                              | 0                                     | 0             | 0                                | 0             | 0          | 0            | 0          | 0             |
| <b>Total</b>                                                                  | <b>39</b>                             | <b>33,036</b> | <b>14</b>                        | <b>44,039</b> | <b>140</b> | <b>2,287</b> | <b>193</b> | <b>79,362</b> |
| <sup>1</sup> Book value of investment                                         |                                       |               |                                  |               |            |              |            |               |
| <sup>2</sup> Original market value of investment                              |                                       |               |                                  |               |            |              |            |               |

## SERVICE TEST

The bank's Service Test performance is excellent.

### Retail Services

Comerica's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's 36 branch offices and 41 ATMs as of April 1, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 84 summarizes the bank's retail locations in Greater Los Angeles MSA AA.

**Table 84**

| Branch and Full-Service ATM Locations<br>Assessment Area: Greater Los Angeles MSA |                  |                 |                 |           |              |                   |              |
|-----------------------------------------------------------------------------------|------------------|-----------------|-----------------|-----------|--------------|-------------------|--------------|
| Tract Income                                                                      | % of Geographies | % of Households | % of Businesses | Branches  |              | Full-Service ATMs |              |
|                                                                                   |                  |                 |                 | #         | %            | #                 | %            |
| Low                                                                               | 5.7              | 4.9             | 3.5             | 0         | 0.0          | 0                 | 0.0          |
| Moderate                                                                          | 27.5             | 25.7            | 19.3            | 6         | 16.7         | 8                 | 19.5         |
| Middle                                                                            | 29.8             | 30.1            | 28.0            | 10        | 27.8         | 13                | 31.7         |
| Upper                                                                             | 34.4             | 38.2            | 46.7            | 19        | 52.8         | 19                | 46.3         |
| Unknown                                                                           | 2.6              | 1.2             | 2.5             | 1         | 2.8          | 1                 | 2.4          |
| <b>Total</b>                                                                      | <b>100.0</b>     | <b>100.0</b>    | <b>100.0</b>    | <b>36</b> | <b>100.0</b> | <b>41</b>         | <b>100.0</b> |

The bank closed two branches in the AA: one in a middle-income census tract and one in an unknown-income geography. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations are tailored to the convenience and needs of the AA, particularly in LMI geographies or to LMI individuals.

Products and services are uniformly offered in all branches within the AA. Hours of operation for AA branches vary slightly, based upon transaction volume and demographic needs. Of the six branches located in moderate income census tracts, four offer extended and/or weekend hours of operation to better serve the community. Branches in middle- and upper-income census tracts

follow a similar pattern, with the majority offering extended hours and approximately half offering weekend hours.

### ***Community Development Services***

The bank is a leader in providing CD services in the Greater Los Angeles MSA AA. The bank's employees served in various capacities, including boards of directors and as trustees, for 64 organizations offering CD services targeted toward LMI individuals. This represents a broadening of the bank's approach to providing CD services in the AA, as the bank provided services to more than twice as many community organizations than during the previous evaluation. During the review period, bank employees provided 723 CD services totaling 2,179 hours. Examples of services performed by bank employees include:

- Several bank representatives provided services to an organization which provides life skills training to LMI individuals with developmental disabilities. The organization provides job development and college preparation programs as well as providing access to affordable housing.
- Bank employees provided a significant volume of financial education to LMI individuals through partnerships with several organizations, including a local community health network serving underrepresented individuals, and an organization focused on serving women who grew up in foster care, have been homeless, or escaped from domestic violence or trafficking.
- A bank employee served on the board of directors of an organization with an express mission of improving California's economic future by teaching economics and financial literacy to Title 1 students. The Every Student Succeeds Act defines Title 1 schools, as those that provide financial assistance to children who are from low-income families to help ensure that all children meet academic standards.

**SALINAS MSA ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SALINAS MSA ASSESSMENT AREA**

The bank's Salinas MSA AA consists of the entirety of Monterey County, which is coterminous with the Salinas, CA MSA. See Appendix A for an AA map and Appendix B for additional demographic data.

- The AA is made up of 104 census tracts, of which 3.9 percent are designated as low-income, 25.0 percent are moderate-income, 32.7 percent are middle-income, 34.6 percent are upper-income, and 3.8 percent are designated as unknown-income.
- Following the 2020 U.S. Census, ten new census tracts were drawn within the AA, representing a 10.6 percent increase. In addition, the number of geographies designated as LMI increased by 20.0 percent.
- The bank operates three full-service branches in the AA, including one branch in a moderate-income census tract and two in upper-income tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 2.7 percent market share, ranking 8<sup>th</sup> out of 14 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 32<sup>nd</sup> out of 388 HMDA reporters in the AA with 51 HMDA originations and purchases, and 31<sup>st</sup> out of 88 CRA reporters with 18 CRA small business and small farm loans.
- Community contacts identified the following as credit and CD needs in the AA: financial literacy and resources for the underbanked and unbanked communities (particularly in rural areas); capital for small businesses; affordable housing for low-income individuals and families; financial institutions' participation in loan guarantee programs that benefit small businesses; and volunteering on the loan committees of CD organizations. A community contact indicated that the AA has a significant shortage of affordable housing for low-income individuals and families due to population growth. Additionally, the contact stated that low paying wages hinder homeownership. Lastly, the community noted that financial institutions have limited opportunities to participate in CD programs and financing of housing projects given the county's concerns with steering.

**Table 85**

| <b>Population Change<br/>Assessment Area: Salinas MSA</b>                                                           |                            |                            |                              |
|---------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|------------------------------|
| <b>Area</b>                                                                                                         | <b>2015<br/>Population</b> | <b>2020<br/>Population</b> | <b>Percentage<br/>Change</b> |
| Salinas MSA AA                                                                                                      | 428,441                    | 439,035                    | 2.5                          |
| California                                                                                                          | 38,421,464                 | 39,538,223                 | 2.9                          |
| <i>Source: 2020 U.S. Census Bureau Decennial Census<br/>2011-2015 U.S. Census Bureau: American Community Survey</i> |                            |                            |                              |

- Population between 2015 and 2020 grew 2.5 percent in the AA, which is comparable to the state population growth rate.
- The Salinas MSA AA consists of a small population compared to larger cities within the state of California.

**Table 86**

| <b>Median Family Income Change<br/>Assessment Area: Salinas MSA</b>                                                                                                                                                                |                                      |                                      |                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------------------|------------------------------|
| <b>Area</b>                                                                                                                                                                                                                        | <b>2015 Median<br/>Family Income</b> | <b>2020 Median<br/>Family Income</b> | <b>Percentage<br/>Change</b> |
| Salinas MSA AA                                                                                                                                                                                                                     | 68,222                               | 83,052                               | 21.7                         |
| California                                                                                                                                                                                                                         | 77,267                               | 89,798                               | 16.2                         |
| <i>Source: 2011-2015 U.S. Census Bureau: American Community Survey<br/>2016-2020 U.S. Census Bureau: American Community Survey<br/>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i> |                                      |                                      |                              |

- The AA's MFI grew significantly, at 21.7 percent, which is higher than the 16.2 percent state level change.
- According to the 2022 FFIEC Census data, 13,242 households out of the 128,003 total households in the AA live below the poverty level. Additionally, 28.8 percent of households within the AA are LMI.
- A community contact characterized the families in the local community as either very wealthy or very poor.

**Table 87**

| <b>Housing Cost Burden<br/>Assessment Area: Salinas MSA</b>                                                                                                                                                       |                              |                            |                        |                             |                            |                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------|------------------------|-----------------------------|----------------------------|-------------------|
| <b>Area</b>                                                                                                                                                                                                       | <b>Cost Burden - Renters</b> |                            |                        | <b>Cost Burden - Owners</b> |                            |                   |
|                                                                                                                                                                                                                   | <b>Low<br/>Income</b>        | <b>Moderate<br/>Income</b> | <b>All<br/>Renters</b> | <b>Low<br/>Income</b>       | <b>Moderate<br/>Income</b> | <b>All Owners</b> |
| Salinas MSA AA                                                                                                                                                                                                    | 82.6                         | 55.2                       | 50.7                   | 67.3                        | 48.0                       | 30.3              |
| California                                                                                                                                                                                                        | 80.6                         | 50.9                       | 50.0                   | 65.9                        | 46.8                       | 29.5              |
| <i>Cost burden is housing cost that equals 30 percent or more of household income.<br/>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i> |                              |                            |                        |                             |                            |                   |

- The AA housing cost burden is comparable to the state of California. The housing cost burden has a greater impact on renters than homeowners.
- The AA lacks affordable housing, as noted by the community contact, with the median housing value being \$559,000. The median housing value for the state of California, at \$539,000, is slightly more affordable but still challenging for LMI families.
- The AA's median age of housing stock is 53 years, which is slightly older than the median age of housing stock for state of California, at 45 years.
- A community contact noted a significant shortage of affordable housing for LMI due to population growth in the AA. Additionally, housing affordability is difficult for LMI to achieve due to low wage paying jobs and high housing costs.

**Table 88**

| <b>Unemployment Rates<br/>Assessment Area: Salinas MSA</b>                    |             |             |             |             |             |
|-------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Region</b>                                                                 | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| Salinas MSA AA                                                                | 6.4         | 6.4         | 11.2        | 8.3         | 6.0         |
| California                                                                    | 4.3         | 4.1         | 10.2        | 7.3         | 4.2         |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> |             |             |             |             |             |



- During each of the most recent five years, the AA unemployment rate has been consistently higher than that of the state of California.
- Unemployment rates almost doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- Employment within the AA is dominated by agriculture. Other major employment industries within the AA include accommodation and food services and healthcare and social assistance. A community contact noted that tourism also drives the local AA economy.
- A community contact indicated that the Salinas MSA AA economy was impacted by the COVID-19 pandemic and storms that occurred in late 2022. The storms caused flooding, mud slides, and widespread power outages that adversely impacted crops and employment.

Table 89 details selected characteristics of the AA.

**Table 89**

| 2022 Combined Demographics<br>Assessment Area: Salinas MSA                                                                                                                                |                           |                                    |                          |                  |                                           |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|-------------------------------------------|----------------------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                         | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 4                         | 3.8                                | 4,381                    | 4.7              | 880                                       | 20.1                 | 20,244                    | 21.8      |
| Moderate                                                                                                                                                                                  | 26                        | 25.0                               | 24,191                   | 26.0             | 3,520                                     | 14.6                 | 16,285                    | 17.5      |
| Middle                                                                                                                                                                                    | 34                        | 32.7                               | 34,272                   | 36.9             | 2,669                                     | 7.8                  | 19,082                    | 20.5      |
| Upper                                                                                                                                                                                     | 36                        | 34.6                               | 30,100                   | 32.4             | 1,127                                     | 3.7                  | 37,337                    | 40.2      |
| Unknown                                                                                                                                                                                   | 4                         | 3.8                                | 4                        | 0.0              | 0                                         | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 104                       | 100.0                              | 92,948                   | 100.0            | 8,196                                     | 8.8                  | 92,948                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                           |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                    |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                         | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 5,375                     | 1,109                              | 1.7                      | 20.6             | 3,962                                     | 73.7                 | 304                       | 5.7       |
| Moderate                                                                                                                                                                                  | 33,035                    | 12,410                             | 18.7                     | 37.6             | 18,714                                    | 56.6                 | 1,911                     | 5.8       |
| Middle                                                                                                                                                                                    | 48,998                    | 22,718                             | 34.2                     | 46.4             | 23,138                                    | 47.2                 | 3,142                     | 6.4       |
| Upper                                                                                                                                                                                     | 54,498                    | 30,105                             | 45.4                     | 55.2             | 15,843                                    | 29.1                 | 8,550                     | 15.7      |
| Unknown                                                                                                                                                                                   | 4                         | 4                                  | 0.0                      | 100.0            | 0                                         | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 141,910                   | 66,346                             | 100.0                    | 46.8             | 61,657                                    | 43.4                 | 13,907                    | 9.8       |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                           |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                           | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                         | #                    | %                         | #         |
| Low                                                                                                                                                                                       | 399                       | 2.4                                | 383                      | 2.5              | 15                                        | 1.3                  | 1                         | 1.1       |
| Moderate                                                                                                                                                                                  | 2,915                     | 17.6                               | 2,695                    | 17.6             | 205                                       | 18.1                 | 15                        | 15.8      |
| Middle                                                                                                                                                                                    | 5,168                     | 31.2                               | 4,737                    | 30.9             | 395                                       | 34.8                 | 36                        | 37.9      |
| Upper                                                                                                                                                                                     | 8,026                     | 48.4                               | 7,482                    | 48.8             | 503                                       | 44.3                 | 41                        | 43.2      |
| Unknown                                                                                                                                                                                   | 69                        | 0.4                                | 50                       | 0.3              | 17                                        | 1.5                  | 2                         | 2.1       |
| Total AA                                                                                                                                                                                  | 16,577                    | 100.0                              | 15,347                   | 100.0            | 1,135                                     | 100.0                | 95                        | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    |                          | 92.6             |                                           | 6.8                  |                           | 0.6       |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                           |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                           | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                         | #                    | %                         | #         |
| Low                                                                                                                                                                                       | 14                        | 2.4                                | 8                        | 1.7              | 6                                         | 4.9                  | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 119                       | 20.5                               | 85                       | 18.6             | 34                                        | 27.9                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 270                       | 46.6                               | 213                      | 46.5             | 57                                        | 46.7                 | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 173                       | 29.8                               | 151                      | 33.0             | 22                                        | 18.0                 | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 4                         | 0.7                                | 1                        | 0.2              | 3                                         | 2.5                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 580                       | 100.0                              | 458                      | 100.0            | 122                                       | 100.0                | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    |                          | 79.0             |                                           | 21.0                 |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                           |                      |                           |           |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Comerica's Lending Test performance in the Salinas MSA AA is adequate. For this evaluation, the bank's home mortgage and small business lending carried comparable weight, as they represented similar lending volume in the AA. Additionally, the volume of home mortgage sub products was insufficient to allow for a separate analysis.

Details of the bank's 2020 mortgage and small business lending and information regarding aggregate lenders' performance can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the Salinas MSA AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to meet such needs. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs, including 117 SBA loan originations and 15 small business micro loans.

Comerica originated 137 home mortgage and 139 small business loans in the AA between January 1, 2020, and December 31, 2022. The number of home mortgage loans slightly increased by 13.3 percent between 2020 and 2022, while the number small business loans decreased by 77.3 percent during the same period of time. The significant decrease in small business lending is primarily due to the conclusion of the SBA's PPP in May 2021 and rising interest rates. Loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects adequate penetration throughout the Salinas MSA AA. The bank's small business and home mortgage lending reflect adequate penetration among geographies of different income levels, especially LMI geographies. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about Comerica's performance in LMI census tracts. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects adequate penetration throughout the Salinas MSA AA. While the bank did not make any home mortgage loans in the AA's low-income census tracts, this is comparable to aggregate data as well as the demographic figure. Distribution of the bank's home mortgage lending among moderate-income census tracts in 2021 is comparable to aggregate data and below the demographic figure. Conversely, Comerica's 2022 lending is below aggregate lending but comparable to the demographic figure.

The bank's 2020 lending performance reflected penetration levels that exceeded Comerica's 2021 performance but was below the one in 2022. Nevertheless, the bank's overall performance was not adversely impacted.

**Table 90A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Salinas MSA                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.5   | 0    | 0.0   | 1.8   | 0       | 0.0   | 1.2   | 1.7                          |
| Moderate                                                                         | 1                                | 50.0  | 17.5  | 81      | 6.2   | 12.2  | 0    | 0.0   | 28.1  | 0       | 0.0   | 22.6  | 18.7                         |
| Middle                                                                           | 0                                | 0.0   | 34.0  | 0       | 0.0   | 26.9  | 0    | 0.0   | 30.4  | 0       | 0.0   | 25.4  | 34.2                         |
| Upper                                                                            | 1                                | 50.0  | 47.7  | 1,225   | 93.8  | 60.3  | 3    | 100.0 | 39.0  | 1,059   | 100.0 | 50.2  | 45.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 0.0                          |
| Total                                                                            | 2                                | 100.0 | 100.0 | 1,306   | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 1,059   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.7   | 0       | 0.0   | 0.4   | 0    | 0.0   | 2.2   | 0       | 0.0   | 1.2   | 1.7                          |
| Moderate                                                                         | 3                                | 15.8  | 14.1  | 808     | 11.2  | 10.2  | 3    | 37.5  | 18.6  | 626     | 26.0  | 12.2  | 18.7                         |
| Middle                                                                           | 6                                | 31.6  | 35.9  | 1,683   | 23.4  | 29.3  | 2    | 25.0  | 33.9  | 1,180   | 49.1  | 26.8  | 34.2                         |
| Upper                                                                            | 10                               | 52.6  | 49.3  | 4,704   | 65.4  | 60.0  | 3    | 37.5  | 45.2  | 598     | 24.9  | 59.8  | 45.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 19                               | 100.0 | 100.0 | 7,195   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 2,404   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0    | 0.0   | 1.3   | 0       | 0.0   | 0.5   | 1.7                          |
| Moderate                                                                         | 0                                | 0.0   | 11.0  | 0       | 0.0   | 7.5   | 2    | 9.1   | 12.6  | 114     | 2.8   | 12.0  | 18.7                         |
| Middle                                                                           | 2                                | 16.7  | 23.3  | 206     | 7.6   | 15.3  | 6    | 27.3  | 31.9  | 903     | 22.2  | 21.6  | 34.2                         |
| Upper                                                                            | 10                               | 83.3  | 65.4  | 2,489   | 92.4  | 76.9  | 14   | 63.6  | 54.1  | 3,047   | 75.0  | 65.9  | 45.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 12                               | 100.0 | 100.0 | 2,695   | 100.0 | 100.0 | 22   | 100.0 | 100.0 | 4,064   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 1.6   | 0       | 0.0   | 1.0   | 0    | 0.0   | 14.8  | 0       | 0.0   | 4.5   | 7.3                          |
| Moderate                                                                         | 0                                | 0.0   | 31.1  | 0       | 0.0   | 32.7  | 0    | 0.0   | 35.2  | 0       | 0.0   | 30.3  | 31.3                         |
| Middle                                                                           | 0                                | 0.0   | 26.2  | 0       | 0.0   | 15.5  | 0    | 0.0   | 24.1  | 0       | 0.0   | 35.5  | 32.5                         |
| Upper                                                                            | 0                                | 0.0   | 41.0  | 0       | 0.0   | 50.9  | 1    | 100.0 | 25.9  | 4,560   | 100.0 | 29.6  | 28.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 4,560   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 0                                | 0.0   | 0.7   | 0       | 0.0   | 0.5   | 0    | 0.0   | 2.0   | 0       | 0.0   | 1.3   | 1.7                          |
| Moderate                                                                         | 5                                | 12.2  | 14.7  | 977     | 7.5   | 11.0  | 8    | 15.7  | 21.6  | 1,100   | 7.1   | 17.8  | 18.7                         |
| Middle                                                                           | 9                                | 22.0  | 35.0  | 2,237   | 17.3  | 27.6  | 13   | 25.5  | 31.8  | 3,295   | 21.3  | 25.3  | 34.2                         |
| Upper                                                                            | 27                               | 65.9  | 49.6  | 9,752   | 75.2  | 60.9  | 30   | 58.8  | 44.3  | 11,064  | 71.6  | 55.2  | 45.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0.0                          |
| Total                                                                            | 41                               | 100.0 | 100.0 | 12,966  | 100.0 | 100.0 | 51   | 100.0 | 100.0 | 15,459  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

**Table 90B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Salinas MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.3   | 1.7                          |
| Moderate                                                                                                         | 1                                | 12.5  | 4.0   | 88      | 5.0   | 1.5   | 3    | 17.6  | 8.6   | 360     | 10.7  | 4.9   | 18.7                         |
| Middle                                                                                                           | 1                                | 12.5  | 21.3  | 348     | 19.7  | 10.2  | 5    | 29.4  | 32.2  | 1,212   | 35.9  | 17.2  | 34.2                         |
| Upper                                                                                                            | 6                                | 75.0  | 74.1  | 1,334   | 75.4  | 88.1  | 9    | 52.9  | 58.4  | 1,800   | 53.4  | 77.6  | 45.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                            | 8                                | 100.0 | 100.0 | 1,770   | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 3,372   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.7                          |
| Moderate                                                                                                         | 0                                | 0.0   | 10.7  | 0       | 0.0   | 2.5   | 0    | 0.0   | 10.1  | 0       | 0.0   | 4.4   | 18.7                         |
| Middle                                                                                                           | 0                                | 0.0   | 18.6  | 0       | 0.0   | 5.7   | 0    | 0.0   | 20.2  | 0       | 0.0   | 6.3   | 34.2                         |
| Upper                                                                                                            | 0                                | 0.0   | 70.6  | 0       | 0.0   | 91.8  | 0    | 0.0   | 69.7  | 0       | 0.0   | 89.3  | 45.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 0                                | 0.0   | 3.8   | 0       | 0.0   | 2.7   | 0    | 0.0   | 9.4   | 0       | 0.0   | 5.0   | 1.7                          |
| Moderate                                                                                                         | 0                                | 0.0   | 20.8  | 0       | 0.0   | 17.8  | 0    | 0.0   | 15.6  | 0       | 0.0   | 11.5  | 18.7                         |
| Middle                                                                                                           | 0                                | 0.0   | 41.5  | 0       | 0.0   | 44.0  | 0    | 0.0   | 37.5  | 0       | 0.0   | 38.0  | 34.2                         |
| Upper                                                                                                            | 0                                | 0.0   | 34.0  | 0       | 0.0   | 35.5  | 0    | 0.0   | 37.5  | 0       | 0.0   | 45.5  | 45.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The total number of small business loans in LMI census tracts between 2020 and 2022 decreased due to the conclusion of the SBA's PPP and increasing interest rates. Comerica did not extend any small business loans within the AA low-income census tracts in 2022; however, the distribution among moderate-income census tracts is comparable to aggregate and demographic data. In 2021, small business lending in low-income tracts is comparable to aggregate while the distribution of loans among moderate-income tracts is below aggregate data and the demographic figure.

The bank's 2020 lending performance is consistent with 2021. A community contact identified small businesses loans and access to capital as credit and CD needs in the AA. The bank's participation in the SBA's PPP in 2020 and 2021 demonstrates its efforts in meeting the needs of small businesses in the AA.

**Table 91**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Salinas MSA                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 1                                | 2.1   | 2.7   | 55      | 0.7   | 2.3   | 0    | 0.0   | 2.1   | 0       | 0.0   | 1.8   | 2.4                      |
| Moderate                                                                                                                                                                                  | 2                                | 4.3   | 12.9  | 1,058   | 13.9  | 10.6  | 3    | 17.6  | 18.5  | 1,110   | 23.3  | 16.4  | 17.6                     |
| Middle                                                                                                                                                                                    | 12                               | 25.5  | 31.7  | 2,499   | 32.8  | 35.0  | 6    | 35.3  | 34.1  | 2,249   | 47.2  | 37.1  | 31.2                     |
| Upper                                                                                                                                                                                     | 32                               | 68.1  | 49.1  | 4,006   | 52.6  | 50.7  | 8    | 47.1  | 42.6  | 1,410   | 29.6  | 42.6  | 48.4                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.9   | 0.4                      |
| Total                                                                                                                                                                                     | 47                               | 100.0 | 100.0 | 7,618   | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 4,769   | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels***

The bank's borrower distribution of lending reflects an excellent penetration among individuals of different income levels. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### ***Residential Real Estate (HMDA) Lending***

Comerica's borrower distribution of home mortgage lending in the AA is excellent when compared to the performance of aggregate HMDA lenders. The bank's 2021 and 2022 home mortgage lending among LMI borrowers is greater than the level of penetration reflected by aggregate data though below the demographic figure.

The bank's lending performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is materially greater than aggregate.

**Table 92A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Salinas MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 21.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 3.6   | 0       | 0.0   | 1.7   | 0    | 0.0   | 2.5   | 0       | 0.0   | 1.1   | 17.5                              |
| Middle                                                                                                       | 0                                | 0.0   | 14.7  | 0       | 0.0   | 9.2   | 0    | 0.0   | 13.1  | 0       | 0.0   | 8.2   | 20.5                              |
| Upper                                                                                                        | 2                                | 100.0 | 66.3  | 1,306   | 100.0 | 74.5  | 3    | 100.0 | 66.8  | 1,059   | 100.0 | 73.1  | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 14.9  | 0       | 0.0   | 14.2  | 0    | 0.0   | 17.1  | 0       | 0.0   | 17.3  | 0.0                               |
| Total                                                                                                        | 2                                | 100.0 | 100.0 | 1,306   | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 1,059   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 2                                | 10.5  | 2.8   | 293     | 4.1   | 1.6   | 0    | 0.0   | 7.5   | 0       | 0.0   | 5.6   | 21.8                              |
| Moderate                                                                                                     | 3                                | 15.8  | 9.6   | 570     | 7.9   | 5.7   | 2    | 25.0  | 12.1  | 376     | 15.6  | 7.1   | 17.5                              |
| Middle                                                                                                       | 5                                | 26.3  | 20.2  | 1,819   | 25.3  | 15.3  | 1    | 12.5  | 21.2  | 200     | 8.3   | 14.4  | 20.5                              |
| Upper                                                                                                        | 9                                | 47.4  | 52.2  | 4,513   | 62.7  | 60.6  | 5    | 62.5  | 45.7  | 1,828   | 76.0  | 54.3  | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 15.2  | 0       | 0.0   | 16.8  | 0    | 0.0   | 13.5  | 0       | 0.0   | 18.6  | 0.0                               |
| Total                                                                                                        | 19                               | 100.0 | 100.0 | 7,195   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 2,404   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 1.8   | 0       | 0.0   | 1.6   | 2    | 9.1   | 2.1   | 117     | 2.9   | 1.1   | 21.8                              |
| Moderate                                                                                                     | 1                                | 8.3   | 5.4   | 136     | 5.0   | 3.2   | 1    | 4.5   | 7.6   | 31      | 0.8   | 4.7   | 17.5                              |
| Middle                                                                                                       | 0                                | 0.0   | 14.9  | 0       | 0.0   | 10.2  | 1    | 4.5   | 18.5  | 158     | 3.9   | 12.8  | 20.5                              |
| Upper                                                                                                        | 11                               | 91.7  | 75.2  | 2,559   | 95.0  | 81.7  | 18   | 81.8  | 66.5  | 3,758   | 92.5  | 75.2  | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 2.7   | 0       | 0.0   | 3.3   | 0    | 0.0   | 5.2   | 0       | 0.0   | 6.2   | 0.0                               |
| Total                                                                                                        | 12                               | 100.0 | 100.0 | 2,695   | 100.0 | 100.0 | 22   | 100.0 | 100.0 | 4,064   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 3                                | 7.3   | 2.3   | 381     | 2.9   | 1.3   | 3    | 6.0   | 3.8   | 228     | 2.1   | 2.5   | 21.8                              |
| Moderate                                                                                                     | 4                                | 9.8   | 8.1   | 706     | 5.4   | 4.3   | 4    | 8.0   | 7.3   | 495     | 4.5   | 3.6   | 17.5                              |
| Middle                                                                                                       | 10                               | 24.4  | 18.7  | 2,851   | 22.0  | 13.1  | 4    | 8.0   | 16.9  | 627     | 5.8   | 10.4  | 20.5                              |
| Upper                                                                                                        | 24                               | 58.5  | 55.9  | 9,028   | 69.6  | 65.1  | 39   | 78.0  | 57.6  | 9,549   | 87.6  | 66.0  | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 15.0  | 0       | 0.0   | 16.2  | 0    | 0.0   | 14.4  | 0       | 0.0   | 17.5  | 0.0                               |
| Total                                                                                                        | 41                               | 100.0 | 100.0 | 12,966  | 100.0 | 100.0 | 50   | 100.0 | 100.0 | 10,899  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table 92B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Salinas MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 1                                | 12.5  | 1.7   | 88      | 5.0   | 5.9   | 1    | 5.9   | 1.6   | 111     | 3.3   | 2.6   | 21.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 4.0   | 0       | 0.0   | 1.1   | 1    | 5.9   | 3.3   | 88      | 2.6   | 3.0   | 17.5                              |
| Middle                                                                                                       | 5                                | 62.5  | 10.9  | 1,032   | 58.3  | 5.2   | 2    | 11.8  | 11.4  | 269     | 8.0   | 5.6   | 20.5                              |
| Upper                                                                                                        | 2                                | 25.0  | 79.9  | 650     | 36.7  | 86.4  | 13   | 76.5  | 75.5  | 2,904   | 86.1  | 84.4  | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 3.4   | 0       | 0.0   | 1.3   | 0    | 0.0   | 8.2   | 0       | 0.0   | 4.4   | 0.0                               |
| Total                                                                                                        | 8                                | 100.0 | 100.0 | 1,770   | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 3,372   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 4.0   | 0       | 0.0   | 0.9   | 0    | 0.0   | 4.3   | 0       | 0.0   | 2.3   | 21.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 2.8   | 0       | 0.0   | 0.6   | 0    | 0.0   | 7.2   | 0       | 0.0   | 2.5   | 17.5                              |
| Middle                                                                                                       | 0                                | 0.0   | 9.6   | 0       | 0.0   | 1.3   | 0    | 0.0   | 11.5  | 0       | 0.0   | 3.6   | 20.5                              |
| Upper                                                                                                        | 0                                | 0.0   | 71.8  | 0       | 0.0   | 70.8  | 0    | 0.0   | 66.8  | 0       | 0.0   | 73.6  | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 11.9  | 0       | 0.0   | 26.4  | 0    | 0.0   | 10.1  | 0       | 0.0   | 18.1  | 0.0                               |
| Total                                                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 1.9   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.5                              |
| Middle                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.5                              |
| Upper                                                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.2                              |
| Unknown                                                                                                      | 0                                | 0.0   | 98.1  | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is adequate. Aggregate lending serves as a better proxy for loan demand than the total business figure when evaluating the borrower distribution of loans; as such, it carried more weight when rating the bank's performance.

The bank's 2022 small business lending distribution among businesses with annual revenues of \$1 million or less is below aggregate data by number volume and dollar amount. In 2021, the number volume of loans to businesses with revenues of \$1 million or less is comparable while exceeding it by dollar amount. The bank's lending performance in 2020 is consistent with its performance in 2021. Comerica's originations of small business loans decline year after year between 2020 and 2022, as well as the volume of originations to borrowers with unknown revenue, which primarily attributed to the end of the SBA's PPP in May 2021.



**Table 93**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Salinas MSA                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 23                               | 48.9  | 46.9  | 2,978   | 39.1  | 23.4  | 8    | 47.1  | 54.6  | 1,529   | 32.1  | 36.0  | 92.6                     |
| Over \$1 Million                                                                   | 15                               | 31.9  |       | 4,467   | 58.6  |       | 7    | 41.2  |       | 2,710   | 56.8  |       | 6.8                      |
| Revenue Unknown                                                                    | 9                                | 19.1  |       | 173     | 2.3   |       | 2    | 11.8  |       | 530     | 11.1  |       | 0.6                      |
| Total                                                                              | 47                               | 100.0 |       | 7,618   | 100.0 |       | 17   | 100.0 |       | 4,769   | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 32                               | 68.1  | 94.6  | 1,109   | 14.6  | 47.2  | 8    | 47.1  | 96.9  | 436     | 9.1   | 57.4  |                          |
| \$100,001 - \$250,000                                                              | 7                                | 14.9  | 3.5   | 1,421   | 18.7  | 19.6  | 2    | 11.8  | 1.9   | 450     | 9.4   | 13.1  |                          |
| \$250,001 - \$1 Million                                                            | 8                                | 17.0  | 1.8   | 5,088   | 66.8  | 33.2  | 7    | 41.2  | 1.2   | 3,883   | 81.4  | 29.5  |                          |
| Total                                                                              | 47                               | 100.0 | 100.0 | 7,618   | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 4,769   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 18                               | 78.3  |       | 606     | 20.3  |       | 5    | 62.5  |       | 346     | 22.6  |       |                          |
| \$100,001 - \$250,000                                                              | 3                                | 13.0  |       | 634     | 21.3  |       | 1    | 12.5  |       | 200     | 13.1  |       |                          |
| \$250,001 - \$1 Million                                                            | 2                                | 8.7   |       | 1,738   | 58.4  |       | 2    | 25.0  |       | 983     | 64.3  |       |                          |
| Total                                                                              | 23                               | 100.0 |       | 2,978   | 100.0 |       | 8    | 100.0 |       | 1,529   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### Community Development Lending

Comerica makes an adequate level of CD loans in the Salinas MSA AA, with the bank originating three CD loans totaling \$26 million. The number of CD loan originations in the Salinas MSA AA decreased by 70.0 percent since the previous evaluation, which is partially attributable to the cessation of the SBA's PPP in May 2021. Despite this decrease in the number volume, the dollar amount of CD loans in the AA increased by 214.3 percent since from the previous evaluation, highlighting the bank's willingness to make sizable CD loans when the opportunity arises. Comerica's CD lending activities considered responsive to credit needs in the AA include:

- A \$25 million line of credit promoting economic development by financing a small business and supporting permanent retention of 126 LMI jobs.
- A \$500,000 line of credit to a local organization providing drug prevention education, residential housing assistance, and outpatient counseling services targeted at LMI individuals and families in the AA.

**Table 94**

| Community Development Lending<br>Assessment Area: Salinas MSA |          |               |
|---------------------------------------------------------------|----------|---------------|
| Purpose                                                       | #        | \$000s        |
| Affordable Housing                                            | 0        | 0             |
| Community Services                                            | 2        | 1,000         |
| Economic Development                                          | 1        | 25,000        |
| Revitalization and Stabilization                              | 0        | 0             |
| <b>Total</b>                                                  | <b>3</b> | <b>26,000</b> |

## INVESTMENT TEST

Comerica's performance under the Investment Test in the Salinas MSA AA is good. The bank has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank's overall number of CD investments and grants decreased since the previous evaluation, though the dollar amount increased substantially. While Comerica makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of the AA, it is rarely in a leadership position.

Table 95 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. The bank's qualified CD investments consist entirely of LIHTC investments, aiming for increasing affordable housing in the AA. On the other hand, the bank's CD donations were granted to organizations that provide community services targeted to LMI individuals and geographies.

**Table 95**

| Investment, Grants, and Donations<br>Assessment Area: Salinas MSA |                                       |            |                                  |               |           |           |           |               |
|-------------------------------------------------------------------|---------------------------------------|------------|----------------------------------|---------------|-----------|-----------|-----------|---------------|
| Community Development Purpose                                     | Prior Period Investments <sup>1</sup> |            | Current Investments <sup>2</sup> |               | Donations |           | Total     |               |
|                                                                   | #                                     | \$(000s)   | #                                | \$(000s)      | #         | \$(000s)  | #         | \$(000s)      |
| Affordable Housing                                                | 3                                     | 855        | 2                                | 22,840        | 0         | 0         | 5         | 23,695        |
| Community Services                                                | 0                                     | 0          | 0                                | 0             | 5         | 28        | 5         | 28            |
| Economic Development                                              | 0                                     | 0          | 0                                | 0             | 0         | 0         | 0         | 0             |
| Revitalization and Stabilization                                  | 0                                     | 0          | 0                                | 0             | 0         | 0         | 0         | 0             |
| <b>Total</b>                                                      | <b>3</b>                              | <b>855</b> | <b>2</b>                         | <b>22,840</b> | <b>5</b>  | <b>28</b> | <b>10</b> | <b>23,723</b> |
| <sup>1</sup> Book value of investment                             |                                       |            |                                  |               |           |           |           |               |
| <sup>2</sup> Original market value of investment                  |                                       |            |                                  |               |           |           |           |               |

## SERVICE TEST

The bank's Service Test performance is good.

### **Retail Services**

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's three branch offices and three ATMs as of April 1, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 96 summarizes the bank's retail locations in the Salinas MSA AA.

**Table 96**

| Branch and Full-Service ATM Locations<br>Assessment Area: Salinas MSA |                     |                    |                    |          |              |                   |              |
|-----------------------------------------------------------------------|---------------------|--------------------|--------------------|----------|--------------|-------------------|--------------|
| Tract<br>Income                                                       | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches |              | Full-Service ATMs |              |
|                                                                       |                     |                    |                    | #        | %            | #                 | %            |
| Low                                                                   | 3.8                 | 4.0                | 2.4                | 0        | 0.0          | 0                 | 0.0          |
| Moderate                                                              | 25.0                | 24.3               | 17.7               | 1        | 33.3         | 1                 | 33.3         |
| Middle                                                                | 32.7                | 35.8               | 31.7               | 0        | 0.0          | 0                 | 0.0          |
| Upper                                                                 | 34.6                | 35.9               | 47.8               | 2        | 66.7         | 2                 | 66.7         |
| Unknown                                                               | 3.8                 | 0.0                | 0.4                | 0        | 0.0          | 0                 | 0.0          |
| <b>Total</b>                                                          | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>3</b> | <b>100.0</b> | <b>3</b>          | <b>100.0</b> |

The bank's branches are located in the northern portion of the AA and are distributed among the cities of Salinas, Monterey, and Prunedale. The largest concentration of LMI census tracts in the AA are in the central and southern portions of Monterey County, where population groups are relatively distant from each other, and a large portion of the geography is a designated state park.

The bank closed one branch in the AA during the review period in an upper-income census tract. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are materially the same throughout the AA.

### ***Community Development Services***

The bank provides a relatively high level of CD services in the Salinas MSA AA. The bank's employees served in various capacities for three organizations offering CD services targeted toward LMI individuals. Overall, bank representatives provided nine CD services totaling 37 hours. Examples of services performed by bank employees include:

- Four bank employees provided financial education to LMI students and their families through two different organizations. In each instance, the education focused on saving, budgeting, and other tools vital for a student to build financial security as they approach graduation and beyond.
- A bank employee serves on the board of director for an organization that provides a wide array of services including alcohol and drug prevention, legal, financial, and clinical counseling, as well as temporary housing for low-income individuals and families.

**SAN JOSE METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN JOSE METROPOLITAN ASSESSMENT AREA**

- The San Jose Metropolitan AA consists of the entirety of Santa Clara County, which along with San Benito County (excluded from the AA) comprises the San Jose-Sunnyvale-Santa Clara, CA MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 408 census tracts, of which 7.1 percent are designated as low-income, 21.8 percent are moderate-income, 40.4 percent are middle-income, 30.4 percent are upper-income, and 0.2 percent are designated as unknown-income.
- Following the 2020 U.S. Census, 36 new census tracts were drawn within the AA, representing a 9.7 percent increase. Geographies designated as LMI increased by 5.9 percent.
- The bank operates 13 full-service branches in the AA, including one branch in a moderate-income census tract, six in middle-income tracts, and six in upper-income tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 3.3 percent market share, ranking 7<sup>th</sup> out of 42 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 30<sup>th</sup> out of 508 HMDA reporters in the AA with 246 HMDA originations and purchases, and 21<sup>st</sup> out of 149 CRA reporters with 217 CRA small business loans.
- A community contact indicated there is a shortage of affordable housing in the AA, and that there are many opportunities for financial institutions to participate in CD and other financing projects.

**Table 97**

| <b>Population Change</b>                                                                                    |                        |                        |                          |
|-------------------------------------------------------------------------------------------------------------|------------------------|------------------------|--------------------------|
| <b>Assessment Area: San Jose Metropolitan</b>                                                               |                        |                        |                          |
| <b>Area</b>                                                                                                 | <b>2015 Population</b> | <b>2020 Population</b> | <b>Percentage Change</b> |
| San Jose Metropolitan AA                                                                                    | 1,868,149              | 1,936,259              | 3.6                      |
| San Jose-Sunnyvale-Santa Clara, CA MSA                                                                      | 1,925,706              | 2,000,468              | 3.9                      |
| California                                                                                                  | 38,421,464             | 39,538,223             | 2.9                      |
| Source: 2020 U.S. Census Bureau Decennial Census<br>2011-2015 U.S. Census Bureau: American Community Survey |                        |                        |                          |

- Population trends during the review period reflect moderate growth throughout the AA, with a 3.6 percent increase. The AA population grew at a faster rate than that of the state of California, at 2.9 percent.

**Table 98**

| <b>Median Family Income Change</b>                                                                                                 |                                  |                                  |                          |
|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|--------------------------|
| <b>Assessment Area: San Jose Metropolitan</b>                                                                                      |                                  |                                  |                          |
| <b>Area</b>                                                                                                                        | <b>2015 Median Family Income</b> | <b>2020 Median Family Income</b> | <b>Percentage Change</b> |
| San Jose Metropolitan AA                                                                                                           | 118,694                          | 148,065                          | 24.7                     |
| San Jose-Sunnyvale-Santa Clara, CA MSA                                                                                             | 117,043                          | 145,548                          | 24.4                     |
| California                                                                                                                         | 77,267                           | 89,798                           | 16.2                     |
| <i>Source: 2011-2015 U.S. Census Bureau: American Community Survey<br/>2016-2020 U.S. Census Bureau: American Community Survey</i> |                                  |                                  |                          |
| <i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>                                 |                                  |                                  |                          |

- MFI reported throughout the AA exceeded the state MFI growth rate by 8.5 percent. It is noteworthy that the AA MFI between 2015 and 2020 is significantly higher than that of the state.
- The AA population is mostly affluent, with 42.4 percent of AA households considered as upper-income as well as 70.8 percent of the AA census tracts designated as middle- and upper-income geographies. Only 7.0 percent of households in the AA live below the poverty level.

**Table 99**

| <b>Housing Cost Burden</b>                                                                                                    |                              |                        |                    |                             |                        |                   |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------|------------------------|--------------------|-----------------------------|------------------------|-------------------|
| <b>Assessment Area: San Jose Metropolitan</b>                                                                                 |                              |                        |                    |                             |                        |                   |
| <b>Area</b>                                                                                                                   | <b>Cost Burden - Renters</b> |                        |                    | <b>Cost Burden – Owners</b> |                        |                   |
|                                                                                                                               | <b>Low Income</b>            | <b>Moderate Income</b> | <b>All Renters</b> | <b>Low Income</b>           | <b>Moderate Income</b> | <b>All Owners</b> |
| San Jose Metropolitan AA                                                                                                      | 80.0                         | 52.3                   | 42.7               | 61.8                        | 44.0                   | 26.4              |
| San Jose-Sunnyvale-Santa Clara, CA MSA                                                                                        | 79.9                         | 52.3                   | 42.7               | 62.0                        | 44.5                   | 26.6              |
| California                                                                                                                    | 80.6                         | 50.9                   | 50.0               | 65.9                        | 46.8                   | 29.5              |
| <i>Cost burden is housing cost that equals 30 percent or more of household income.</i>                                        |                              |                        |                    |                             |                        |                   |
| <i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i> |                              |                        |                    |                             |                        |                   |

- The AA housing cost burden for low-income renters is a substantially greater than the burden on homeowners at any other level. However, the overall the cost burden for homeowners and renters in the AA is comparable to the statewide figures.
- The AA median housing value is \$1.0 million, with a median age of 52 years. The AA median housing value almost doubles the median housing value for the state of California is, at \$539,000.
- A community contact indicated that there is a shortage of affordable housing in the AA; thus, there are significant needs and opportunities for the development of affordable housing.

**Table 100**

| <b>Unemployment Rates</b>                                                     |             |             |             |             |             |
|-------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Assessment Area: San Jose Metropolitan</b>                                 |             |             |             |             |             |
| <b>Region</b>                                                                 | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| San Jose Metropolitan AA                                                      | 2.7         | 2.5         | 7.2         | 4.7         | 2.7         |
| San Jose-Sunnyvale-Santa Clara, CA MSA                                        | 2.7         | 2.6         | 7.3         | 4.8         | 2.7         |
| California                                                                    | 4.3         | 4.1         | 10.2        | 7.3         | 4.2         |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> |             |             |             |             |             |

- In 2020, the unemployment rates almost tripled due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the unemployment rates stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include professional and technical services, manufacturing, and healthcare and social assistance. The AA serves as a hub for many Fortune 500 technology companies, such as Adobe, PayPal, eBay, and Cisco, which provide significant employment opportunities.
- A community contact noted construction labor shortages in the AA.

Table 101 details selected characteristics of the AA.

Table 101

| 2022 Combined Demographics                                     |                           |                       |                                    |              |                                                    |              |                           |              |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: San Jose Metropolitan                         |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 29                        | 7.1                   | 23,164                             | 5.1          | 2,811                                              | 12.1         | 104,187                   | 22.9         |
| Moderate                                                       | 89                        | 21.8                  | 86,385                             | 19.0         | 6,015                                              | 7.0          | 73,264                    | 16.1         |
| Middle                                                         | 165                       | 40.4                  | 192,933                            | 42.5         | 6,893                                              | 3.6          | 84,970                    | 18.7         |
| Upper                                                          | 124                       | 30.4                  | 151,198                            | 33.3         | 3,914                                              | 2.6          | 191,728                   | 42.2         |
| Unknown                                                        | 1                         | 0.2                   | 469                                | 0.1          | 35                                                 | 7.5          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>408</b>                | <b>100.0</b>          | <b>454,149</b>                     | <b>100.0</b> | <b>19,668</b>                                      | <b>4.3</b>   | <b>454,149</b>            | <b>100.0</b> |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                            | 36,159                    | 10,896                | 3.0                                | 30.1         | 23,941                                             | 66.2         | 1,322                     | 3.7          |
| Moderate                                                       | 126,678                   | 56,817                | 15.9                               | 44.9         | 64,237                                             | 50.7         | 5,624                     | 4.4          |
| Middle                                                         | 290,650                   | 149,262               | 41.7                               | 51.4         | 126,184                                            | 43.4         | 15,204                    | 5.2          |
| Upper                                                          | 214,379                   | 140,898               | 39.3                               | 65.7         | 62,130                                             | 29.0         | 11,351                    | 5.3          |
| Unknown                                                        | 1,030                     | 355                   | 0.1                                | 34.5         | 594                                                | 57.7         | 81                        | 7.9          |
| <b>Total AA</b>                                                | <b>668,896</b>            | <b>358,228</b>        | <b>100.0</b>                       | <b>53.6</b>  | <b>277,086</b>                                     | <b>41.4</b>  | <b>33,582</b>             | <b>5.0</b>   |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 4,602                     | 4.9                   | 4,187                              | 4.8          | 398                                                | 5.3          | 17                        | 3.6          |
| Moderate                                                       | 17,040                    | 18.0                  | 15,071                             | 17.4         | 1,908                                              | 25.4         | 61                        | 13.1         |
| Middle                                                         | 36,852                    | 39.0                  | 33,926                             | 39.2         | 2,745                                              | 36.5         | 181                       | 38.8         |
| Upper                                                          | 35,816                    | 37.9                  | 33,154                             | 38.3         | 2,457                                              | 32.7         | 205                       | 44.0         |
| Unknown                                                        | 196                       | 0.2                   | 178                                | 0.2          | 16                                                 | 0.2          | 2                         | 0.4          |
| <b>Total AA</b>                                                | <b>94,506</b>             | <b>100.0</b>          | <b>86,516</b>                      | <b>100.0</b> | <b>7,524</b>                                       | <b>100.0</b> | <b>466</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                         |                           |                       |                                    | <b>91.5</b>  |                                                    | <b>8.0</b>   |                           | <b>0.5</b>   |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 16                        | 3.1                   | 12                                 | 2.4          | 4                                                  | 16.7         | 0                         | 0.0          |
| Moderate                                                       | 98                        | 18.7                  | 90                                 | 18.0         | 8                                                  | 33.3         | 0                         | 0.0          |
| Middle                                                         | 230                       | 43.9                  | 224                                | 44.8         | 6                                                  | 25.0         | 0                         | 0.0          |
| Upper                                                          | 180                       | 34.4                  | 174                                | 34.8         | 6                                                  | 25.0         | 0                         | 0.0          |
| Unknown                                                        | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>524</b>                | <b>100.0</b>          | <b>500</b>                         | <b>100.0</b> | <b>24</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                              |                           |                       |                                    | <b>95.4</b>  |                                                    | <b>4.6</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data                                 |                           |                       |                                    |              |                                                    |              |                           |              |
| 2022 Dun & Bradstreet Data                                     |                           |                       |                                    |              |                                                    |              |                           |              |
| 2016-2020 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the San Jose Metropolitan AA is good. For this evaluation, the bank's small business lending carried more weight, as it is a strategic focus for the bank in the AA and represents the largest volume of lending. Home refinance and home improvement lending, as well as other purpose lines of credit, received individual evaluation, as the other HMDA lending products did not have sufficient volume for a meaningful analysis.

Appendix C provides details of the bank's 2020 mortgage and small business lending, as well as corresponding aggregate data.

#### **Lending Activity**

Comerica's lending activity reflects good responsiveness to AA credit needs, as the bank makes use of innovative and/or flexible lending practices. The bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs, including, 773 SBA loans and 157 small business micro loans in the AA during the review period.

For this evaluation, the total volume of loans in the AA included 751 home mortgage and 1,187 small business loans originated between January 1, 2020, and December 31, 2022. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

#### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects good penetration throughout the AA. The bank's small business lending reflects excellent penetration among geographies of different income levels, especially LMI geographies, while home mortgage lending reflects adequate penetration. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects adequate penetration throughout the AA. The distribution of 2021 and 2022 home mortgage lending among low-income census tracts is comparable to aggregate data and the demographic figure. Comerica's home mortgage lending in low-income census tracts declined in 2022, which aligns with the performance of aggregate lenders. This drop in performance correlates to lower demand due to the rising interest rate environment, which makes borrowing more expensive.

Lending in moderate-income census tracts is below aggregate lending data in 2021 and 2022. The bank's performance in 2022 is improved but remains slightly below the level of aggregate lending in these tracts as well as the demographic figure.



The bank's 2020 lending performance reflects penetration levels consistent with 2021 and 2022 performance, with penetration levels comparable to aggregate data and the demographic figure.

#### *Home Refinance Lending*

The geographic distribution of home refinance lending is poor. The distribution of 2022 home refinance loans among low-income census tracts is below aggregate data and the demographic figure. The bank's lending in moderate-income census tracts is well below that of aggregate lenders and the demographic figure.

The bank's lending performance for 2021 reflects penetration levels that were greater than that of 2022. Distribution of 2021 home refinance loans among low-income census tracts in the AA is below aggregate lending performance and the demographic figure, while lending in moderate-income census tracts is comparable to aggregate lending but below the demographic figure.

The bank's lending performance in 2020 reflected penetration levels consistent with 2021 and 2022 performance, with a distribution of loans in LMI census tracts below aggregate data.

#### *Home Improvement Lending*

The geographic distribution of home improvement lending is adequate. The distribution of 2021 home improvement loans among low-income census tracts is above aggregate data and the demographic figure. Distribution of 2022 home improvement loans is comparable to aggregate data and the demographic figure, declining slightly from the previous year's performance. In moderate-income census tracts, the bank's 2021 and 2022 home improvement lending performance is comparable to aggregate data and below the demographic figure. Additionally, greater weight was assigned to the bank's performance compared to aggregate lenders', as aggregate data is a better indicator of loan demand.

The bank's 2020 lending performance reflects penetration levels greater than that of 2021 and 2022, with a distribution of loans in LMI census tracts above aggregate data and comparable to the demographic figure.

#### *Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is good. The 2021 distribution of other purpose lines of credit among LMI census tracts is comparable to aggregate data and below the percentage of owner-occupied units in these geographies. Among low-income census tracts, the bank's 2022 distribution matches aggregate data. The bank's performance in moderate-income census tracts is substantially exceeded the performance reflected by aggregate lenders and almost doubled the demographic figure.

The bank's 2020 lending performance reflects penetration levels comparable to that of 2021, with a distribution of lending in LMI census tracts similar to aggregate data and the demographic figure.

**Table 102A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Jose Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                              | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                            | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                            | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                            | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                        | 1                                | 9.1   | 4.3   | 500     | 6.1   | 2.6   | 0    | 0.0   | 3.4   | 0       | 0.0   | 1.8   | 3.0                          |
| Moderate                                                                                                                   | 2                                | 18.2  | 17.2  | 375     | 4.6   | 11.5  | 1    | 14.3  | 17.0  | 270     | 10.2  | 11.8  | 15.9                         |
| Middle                                                                                                                     | 4                                | 36.4  | 42.6  | 1,298   | 15.9  | 36.0  | 3    | 42.9  | 46.1  | 998     | 37.8  | 39.9  | 41.7                         |
| Upper                                                                                                                      | 4                                | 36.4  | 35.8  | 5,996   | 73.4  | 50.0  | 3    | 42.9  | 33.5  | 1,375   | 52.0  | 46.4  | 39.3                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                      | 11                               | 100.0 | 100.0 | 8,169   | 100.0 | 100.0 | 7    | 100.0 | 100.0 | 2,643   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                                | 0.0   | 4.1   | 0       | 0.0   | 2.9   | 1    | 1.7   | 2.7   | 200     | 0.6   | 1.7   | 3.0                          |
| Moderate                                                                                                                   | 4                                | 8.0   | 14.9  | 1,274   | 4.2   | 11.2  | 1    | 1.7   | 15.8  | 500     | 1.5   | 10.9  | 15.9                         |
| Middle                                                                                                                     | 18                               | 36.0  | 37.8  | 7,116   | 23.3  | 33.8  | 31   | 51.7  | 40.6  | 10,626  | 32.7  | 34.5  | 41.7                         |
| Upper                                                                                                                      | 28                               | 56.0  | 43.1  | 22,109  | 72.5  | 52.1  | 27   | 45.0  | 40.7  | 21,161  | 65.1  | 52.9  | 39.3                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                      | 50                               | 100.0 | 100.0 | 30,499  | 100.0 | 100.0 | 60   | 100.0 | 100.0 | 32,487  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                        | 7                                | 5.2   | 3.1   | 1,164   | 3.2   | 2.4   | 1    | 0.8   | 1.6   | 328     | 0.8   | 1.0   | 3.0                          |
| Moderate                                                                                                                   | 11                               | 8.1   | 11.6  | 1,561   | 4.2   | 8.2   | 9    | 7.4   | 11.8  | 2,313   | 5.7   | 8.5   | 15.9                         |
| Middle                                                                                                                     | 50                               | 37.0  | 37.7  | 13,555  | 36.7  | 33.9  | 58   | 47.9  | 43.5  | 16,881  | 41.8  | 36.9  | 41.7                         |
| Upper                                                                                                                      | 67                               | 49.6  | 47.5  | 20,614  | 55.9  | 55.4  | 53   | 43.8  | 43.0  | 20,847  | 51.6  | 53.5  | 39.3                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                      | 135                              | 100.0 | 100.0 | 36,894  | 100.0 | 100.0 | 121  | 100.0 | 100.0 | 40,369  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                        | 0                                | 0.0   | 21.6  | 0       | 0.0   | 9.8   | 0    | 0.0   | 15.3  | 0       | 0.0   | 10.3  | 8.7                          |
| Moderate                                                                                                                   | 0                                | 0.0   | 25.4  | 0       | 0.0   | 38.6  | 0    | 0.0   | 26.7  | 0       | 0.0   | 16.1  | 20.9                         |
| Middle                                                                                                                     | 0                                | 0.0   | 34.6  | 0       | 0.0   | 30.0  | 1    | 100.0 | 39.1  | 31,800  | 100.0 | 48.4  | 48.1                         |
| Upper                                                                                                                      | 0                                | 0.0   | 18.4  | 0       | 0.0   | 21.6  | 0    | 0.0   | 17.9  | 0       | 0.0   | 25.1  | 22.0                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.2   | 0.3                          |
| Total                                                                                                                      | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 31,800  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                        | 10                               | 3.6   | 4.1   | 2,094   | 2.1   | 2.9   | 3    | 1.2   | 2.9   | 772     | 0.6   | 2.3   | 3.0                          |
| Moderate                                                                                                                   | 23                               | 8.3   | 15.2  | 4,538   | 4.5   | 11.6  | 27   | 11.0  | 15.7  | 6,589   | 5.2   | 11.5  | 15.9                         |
| Middle                                                                                                                     | 103                              | 37.3  | 38.6  | 30,301  | 30.1  | 34.1  | 112  | 45.5  | 43.3  | 66,349  | 52.2  | 38.1  | 41.7                         |
| Upper                                                                                                                      | 140                              | 50.7  | 42.0  | 63,715  | 63.3  | 51.4  | 104  | 42.3  | 37.9  | 53,364  | 42.0  | 48.1  | 39.3                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                      | 276                              | 100.0 | 100.0 | 100,648 | 100.0 | 100.0 | 246  | 100.0 | 100.0 | 127,074 | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

**Table 102B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Jose Metropolitan                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 2                                | 2.5   | 2.4   | 430     | 1.7   | 1.7   | 1    | 1.8   | 1.8   | 244     | 1.3   | 1.1   | 3.0                          |
| Moderate                                                                         | 6                                | 7.5   | 10.3  | 1,328   | 5.3   | 6.4   | 16   | 28.6  | 12.8  | 3,506   | 18.9  | 8.1   | 15.9                         |
| Middle                                                                           | 31                               | 38.8  | 36.7  | 8,332   | 33.2  | 29.5  | 19   | 33.9  | 41.9  | 6,044   | 32.6  | 33.8  | 41.7                         |
| Upper                                                                            | 41                               | 51.3  | 50.5  | 14,996  | 59.8  | 62.4  | 20   | 35.7  | 43.6  | 8,738   | 47.2  | 57.0  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                            | 80                               | 100.0 | 100.0 | 25,086  | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 18,532  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.1   | 0       | 0.0   | 1.6   | 0    | 0.0   | 2.6   | 0       | 0.0   | 0.9   | 3.0                          |
| Moderate                                                                         | 0                                | 0.0   | 12.1  | 0       | 0.0   | 5.3   | 0    | 0.0   | 14.1  | 0       | 0.0   | 4.8   | 15.9                         |
| Middle                                                                           | 0                                | 0.0   | 33.3  | 0       | 0.0   | 18.8  | 0    | 0.0   | 40.6  | 0       | 0.0   | 22.6  | 41.7                         |
| Upper                                                                            | 0                                | 0.0   | 51.6  | 0       | 0.0   | 74.3  | 1    | 100.0 | 42.7  | 1,243   | 100.0 | 71.7  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 1,243   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 8.4   | 0       | 0.0   | 6.3   | 0    | 0.0   | 6.3   | 0       | 0.0   | 0.0   | 3.0                          |
| Moderate                                                                         | 0                                | 0.0   | 26.1  | 0       | 0.0   | 28.5  | 0    | 0.0   | 21.9  | 0       | 0.0   | 28.8  | 15.9                         |
| Middle                                                                           | 0                                | 0.0   | 28.6  | 0       | 0.0   | 22.8  | 0    | 0.0   | 56.3  | 0       | 0.0   | 45.8  | 41.7                         |
| Upper                                                                            | 0                                | 0.0   | 37.0  | 0       | 0.0   | 42.4  | 0    | 0.0   | 15.6  | 0       | 0.0   | 25.4  | 39.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. The distribution of 2021 and 2022 small business loans among low-income census tracts is greater than aggregate data as well as the percentage of businesses in these tracts (the demographic figure). The bank's small business lending in moderate-income census tracts is also above aggregate lending and the demographic figure in both years. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA.

The bank's 2020 lending performance reflects penetration levels consistent with 2021 and 2022 performance, with the lending levels comparable to aggregate data in low-income census tracts and above aggregate lenders in moderate-income tracts.

**Table 103**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: San Jose Metropolitan                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 36                               | 9.6   | 6.4   | 7,445   | 8.9   | 6.3   | 14   | 6.5   | 5.8   | 2,106   | 3.6   | 6.5   | 4.9                      |
| Moderate                                                                                                                                                                                  | 73                               | 19.5  | 19.4  | 17,388  | 20.8  | 21.3  | 55   | 25.3  | 18.9  | 12,924  | 22.2  | 21.9  | 18.0                     |
| Middle                                                                                                                                                                                    | 145                              | 38.7  | 37.2  | 35,701  | 42.8  | 36.9  | 76   | 35.0  | 40.1  | 22,254  | 38.3  | 37.9  | 39.0                     |
| Upper                                                                                                                                                                                     | 121                              | 32.3  | 36.4  | 22,922  | 27.5  | 35.3  | 71   | 32.7  | 34.8  | 20,714  | 35.7  | 33.5  | 37.9                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1    | 0.5   | 0.1   | 100     | 0.2   | 0.1   | 0.2                      |
| Total                                                                                                                                                                                     | 375                              | 100.0 | 100.0 | 83,456  | 100.0 | 100.0 | 217  | 100.0 | 100.0 | 58,098  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's borrower loan distribution reflects an adequate penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers. Greater weight was given to home mortgage lending, as the bank originated more HMDA loans than small business loans in the AA.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is adequate when compared to demographic characteristics, as well as the performance of aggregate lenders. The dispersion of home mortgage loans in the AA among LMI borrowers was comparable to aggregate data, which is far below the percentage of families in the AA classified as LMI. This is indicative of the demand for home mortgage products among LMI borrowers in the AA, where median home values are more than double the average of the state of California.

The bank's 2020 lending performance is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is comparable to aggregate data but below the demographic figure.

**Table 104A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Jose Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                            | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                        | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                        | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                        | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                                | 0.0   | 1.6   | 0       | 0.0   | 0.6   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.5   | 22.9                              |
| Moderate                                                                                                               | 1                                | 9.1   | 6.9   | 386     | 4.7   | 3.2   | 0    | 0.0   | 7.5   | 0       | 0.0   | 3.0   | 16.1                              |
| Middle                                                                                                                 | 2                                | 18.2  | 18.6  | 650     | 8.0   | 12.1  | 2    | 28.6  | 16.0  | 700     | 26.5  | 10.0  | 18.7                              |
| Upper                                                                                                                  | 8                                | 72.7  | 64.2  | 7,133   | 87.3  | 76.6  | 5    | 71.4  | 64.9  | 1,943   | 73.5  | 78.0  | 42.2                              |
| Unknown                                                                                                                | 0                                | 0.0   | 8.7   | 0       | 0.0   | 7.6   | 0    | 0.0   | 9.8   | 0       | 0.0   | 8.5   | 0.0                               |
| Total                                                                                                                  | 11                               | 100.0 | 100.0 | 8,169   | 100.0 | 100.0 | 7    | 100.0 | 100.0 | 2,643   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                                | 0.0   | 5.6   | 0       | 0.0   | 3.1   | 1    | 1.7   | 10.9  | 167     | 0.5   | 6.6   | 22.9                              |
| Moderate                                                                                                               | 6                                | 12.0  | 11.5  | 1,710   | 5.6   | 7.2   | 6    | 10.0  | 12.8  | 1,060   | 3.3   | 7.4   | 16.1                              |
| Middle                                                                                                                 | 7                                | 14.0  | 21.1  | 1,173   | 3.8   | 16.9  | 12   | 20.0  | 18.1  | 4,942   | 15.2  | 13.9  | 18.7                              |
| Upper                                                                                                                  | 34                               | 68.0  | 51.7  | 26,768  | 87.8  | 63.1  | 35   | 58.3  | 46.3  | 16,606  | 51.1  | 59.4  | 42.2                              |
| Unknown                                                                                                                | 3                                | 6.0   | 10.0  | 848     | 2.8   | 9.7   | 6    | 10.0  | 11.9  | 9,712   | 29.9  | 12.7  | 0.0                               |
| Total                                                                                                                  | 50                               | 100.0 | 100.0 | 30,499  | 100.0 | 100.0 | 60   | 100.0 | 100.0 | 32,487  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 4                                | 3.0   | 5.4   | 496     | 1.3   | 3.6   | 4    | 3.3   | 4.3   | 645     | 1.6   | 2.4   | 22.9                              |
| Moderate                                                                                                               | 11                               | 8.1   | 10.4  | 1,978   | 5.4   | 7.4   | 13   | 10.7  | 11.5  | 2,359   | 5.8   | 6.8   | 16.1                              |
| Middle                                                                                                                 | 37                               | 27.4  | 21.9  | 7,407   | 20.1  | 17.5  | 19   | 15.7  | 21.4  | 4,642   | 11.5  | 15.7  | 18.7                              |
| Upper                                                                                                                  | 82                               | 60.7  | 58.5  | 26,549  | 72.0  | 65.5  | 83   | 68.6  | 59.3  | 32,323  | 80.1  | 71.6  | 42.2                              |
| Unknown                                                                                                                | 1                                | 0.7   | 3.8   | 464     | 1.3   | 6.0   | 2    | 1.7   | 3.6   | 400     | 1.0   | 3.5   | 0.0                               |
| Total                                                                                                                  | 135                              | 100.0 | 100.0 | 36,894  | 100.0 | 100.0 | 121  | 100.0 | 100.0 | 40,369  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 6                                | 2.2   | 4.9   | 849     | 0.8   | 2.4   | 9    | 3.7   | 5.9   | 1,729   | 1.8   | 2.9   | 22.9                              |
| Moderate                                                                                                               | 21                               | 7.6   | 10.6  | 4,510   | 4.5   | 6.0   | 21   | 8.6   | 10.2  | 3,913   | 4.1   | 4.8   | 16.1                              |
| Middle                                                                                                                 | 69                               | 25.0  | 20.6  | 15,485  | 15.4  | 15.4  | 51   | 20.8  | 17.7  | 13,934  | 14.6  | 11.7  | 18.7                              |
| Upper                                                                                                                  | 174                              | 63.0  | 54.4  | 78,092  | 77.6  | 67.0  | 153  | 62.4  | 56.5  | 61,803  | 64.9  | 70.8  | 42.2                              |
| Unknown                                                                                                                | 6                                | 2.2   | 9.6   | 1,712   | 1.7   | 9.1   | 11   | 4.5   | 9.7   | 13,895  | 14.6  | 9.8   | 0.0                               |
| Total                                                                                                                  | 276                              | 100.0 | 100.0 | 100,648 | 100.0 | 100.0 | 245  | 100.0 | 100.0 | 95,274  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table 104B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: San Jose Metropolitan                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 2.5   | 4.4   | 353     | 1.4   | 5.4   | 4    | 7.1   | 4.2   | 917     | 4.9   | 3.2   | 22.9                              |
| Moderate                                                                     | 3                                | 3.8   | 8.5   | 436     | 1.7   | 4.3   | 2    | 3.6   | 9.9   | 494     | 2.7   | 5.5   | 16.1                              |
| Middle                                                                       | 23                               | 28.8  | 20.1  | 6,255   | 24.9  | 14.0  | 18   | 32.1  | 21.1  | 3,650   | 19.7  | 15.3  | 18.7                              |
| Upper                                                                        | 50                               | 62.5  | 61.5  | 17,642  | 70.3  | 68.5  | 30   | 53.6  | 58.4  | 10,931  | 59.0  | 68.8  | 42.2                              |
| Unknown                                                                      | 2                                | 2.5   | 5.5   | 400     | 1.6   | 7.8   | 2    | 3.6   | 6.4   | 2,540   | 13.7  | 7.2   | 0.0                               |
| Total                                                                        | 80                               | 100.0 | 100.0 | 25,086  | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 18,532  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 9.1   | 0       | 0.0   | 4.1   | 0    | 0.0   | 11.3  | 0       | 0.0   | 7.0   | 22.9                              |
| Moderate                                                                     | 0                                | 0.0   | 12.0  | 0       | 0.0   | 4.8   | 0    | 0.0   | 13.4  | 0       | 0.0   | 4.5   | 16.1                              |
| Middle                                                                       | 0                                | 0.0   | 16.2  | 0       | 0.0   | 8.4   | 0    | 0.0   | 16.9  | 0       | 0.0   | 7.4   | 18.7                              |
| Upper                                                                        | 0                                | 0.0   | 56.7  | 0       | 0.0   | 70.4  | 0    | 0.0   | 52.0  | 0       | 0.0   | 70.9  | 42.2                              |
| Unknown                                                                      | 0                                | 0.0   | 6.0   | 0       | 0.0   | 12.3  | 1    | 100.0 | 6.4   | 1,243   | 100.0 | 10.2  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 1,243   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 22.9                              |
| Moderate                                                                     | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 16.1                              |
| Middle                                                                       | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.9   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.7                              |
| Upper                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 42.2                              |
| Unknown                                                                      | 0                                | 0.0   | 98.3  | 0       | 0.0   | 98.5  | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is poor. The distribution of 2022 loan originations to businesses with revenues of \$1 million or less is well below the percentage of small businesses in the AA as well as aggregate data by number and dollar amount of originations. The bank's 2021 small business loan distribution is also below the performance of aggregate lenders, though by a smaller margin than 2022.

The bank's 2020 small business lending distribution among businesses with annual revenues of \$1 million or less is slightly above the performance of aggregate lenders. Viewed in conjunction with 2021 and 2022 performance, it is notable that bank's performance declined each year, even as the performance of aggregate lenders improved during the same period of time.

**Table 105**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Jose Metropolitan                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 119                              | 31.7  | 48.8  | 15,657  | 18.8  | 25.4  | 52   | 24.0  | 55.6  | 9,512   | 16.4  | 34.0  | 91.5                     |
| Over \$1 Million                                                                   | 153                              | 40.8  |       | 50,518  | 60.5  |       | 139  | 64.1  |       | 42,256  | 72.7  |       | 8.0                      |
| Revenue Unknown                                                                    | 103                              | 27.5  |       | 17,281  | 20.7  |       | 26   | 12.0  |       | 6,330   | 10.9  |       | 0.5                      |
| Total                                                                              | 375                              | 100.0 |       | 83,456  | 100.0 |       | 217  | 100.0 |       | 58,098  | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 192                              | 51.2  | 93.2  | 9,191   | 11.0  | 40.7  | 98   | 45.2  | 96.5  | 5,490   | 9.4   | 52.9  |                          |
| \$100,001 - \$250,000                                                              | 82                               | 21.9  | 4.1   | 15,689  | 18.8  | 18.5  | 50   | 23.0  | 2.0   | 10,066  | 17.3  | 13.9  |                          |
| \$250,001 - \$1 Million                                                            | 101                              | 26.9  | 2.8   | 58,576  | 70.2  | 40.8  | 69   | 31.8  | 1.5   | 42,542  | 73.2  | 33.2  |                          |
| Total                                                                              | 375                              | 100.0 | 100.0 | 83,456  | 100.0 | 100.0 | 217  | 100.0 | 100.0 | 58,098  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 79                               | 66.4  |       | 3,490   | 22.3  |       | 33   | 63.5  |       | 1,758   | 18.5  |       |                          |
| \$100,001 - \$250,000                                                              | 24                               | 20.2  |       | 4,276   | 27.3  |       | 12   | 23.1  |       | 2,306   | 24.2  |       |                          |
| \$250,001 - \$1 Million                                                            | 16                               | 13.4  |       | 7,891   | 50.4  |       | 7    | 13.5  |       | 5,448   | 57.3  |       |                          |
| Total                                                                              | 119                              | 100.0 |       | 15,657  | 100.0 |       | 52   | 100.0 |       | 9,512   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

## Community Development Lending

The bank makes a relatively high level of CD loans in the AA. The bank originated 56 CD loans totaling \$149.2 million, which comprised 4.2 percent of bank-wide CD loans by number volume and 2.8 percent by dollar amount. The number of CD loan originations in the AA decreased by 5.1 percent since the previous evaluation. This is attributable to the substantial decrease in loans originated through the SBA's PPP, which made up 52.5 percent of the bank's CD loans in the AA. Despite the decrease in number of CD loans, the dollar amount increased by 41.9 percent since the previous evaluation, highlighting the bank's willingness to make sizable CD loans when the opportunity arises.

The largest portion of the bank's CD lending in the AA promotes economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Examples of the bank's CD lending activities that are considered responsive to credit needs in the AA include:

- A \$15 million line of credit to a manufacturer of industrial automation equipment securing 133 LMI jobs in the AA.
- A \$2.4 million loan to a SBA 504 Certified Development Company to support a qualified small business to replace its current rental property by purchasing commercial property.
- A \$17.6 million loan for a 115-unit LIHTC apartment project for households earning less than 80 percent of the area median income. Additionally, 25 percent of the units are set aside for individuals with intellectual and developmental disabilities. Given the affordable

housing shortage in the AA, as indicated by the community contact, the extension of this CD loan reflects favorably on the bank.

- A \$1 million line of credit to a local organization that focuses on building a community free from poverty for LMI children and providing community services, such as educational programs, food and housing assistance.

**Table 106**

| <b>Community Development Lending<br/>Assessment Area: San Jose Metropolitan</b> |           |                |
|---------------------------------------------------------------------------------|-----------|----------------|
| <b>Purpose</b>                                                                  | <b>#</b>  | <b>\$000s</b>  |
| Affordable Housing                                                              | 7         | 50,364         |
| Community Services                                                              | 15        | 10,050         |
| Economic Development                                                            | 26        | 85,018         |
| Revitalization and Stabilization                                                | 8         | 3,788          |
| <b>Total</b>                                                                    | <b>56</b> | <b>149,220</b> |

## INVESTMENT TEST

Comerica's performance under the Investment Test in the AA is good. The bank has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. Comerica is occasionally in a leadership position given its volume of CD investments. The bank's overall number of CD investments and grants decreased since the previous evaluation, though the dollar amount of qualified investments and services increased. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of the AA.

Table 107 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, investments purchased during the current evaluation period, and CD donations made since the previous evaluation. The bank's qualified CD investments consist entirely of LIHTC investments that provide affordable housing in the AA, while the bank's CD donations were provided for a wide array of qualified purposes. Examples of donations extended by the bank include:

- Three donations to an organization to support COVID-19 recovery efforts that provide wraparound services to clients who have experienced job loss, loss of healthcare, rent difficulties, and food scarcity. Approximately 98 percent of the organization's clients, including those benefitting directly from the donations, are LMI.
- A \$12,500 donation to a program providing essential financial education to an elementary school where 78 percent of students qualify for free or reduced-price lunches.



**Table 107**

| Investment, Grants, and Donations<br>Assessment Area: San Jose Metropolitan |                                       |               |                                  |               |           |            |           |               |
|-----------------------------------------------------------------------------|---------------------------------------|---------------|----------------------------------|---------------|-----------|------------|-----------|---------------|
| Community Development Purpose                                               | Prior Period Investments <sup>1</sup> |               | Current Investments <sup>2</sup> |               | Donations |            | Total     |               |
|                                                                             | #                                     | \$(000s)      | #                                | \$(000s)      | #         | \$(000s)   | #         | \$(000s)      |
| Affordable Housing                                                          | 23                                    | 29,375        | 4                                | 26,700        | 1         | 5          | 28        | 56,080        |
| Community Services                                                          | 0                                     | 0             | 0                                | 0             | 20        | 238        | 20        | 238           |
| Economic Development                                                        | 0                                     | 0             | 0                                | 0             | 1         | 20         | 1         | 20            |
| Revitalization and Stabilization                                            | 0                                     | 0             | 0                                | 0             | 0         | 0          | 0         | 0             |
| <b>Total</b>                                                                | <b>23</b>                             | <b>29,375</b> | <b>4</b>                         | <b>26,700</b> | <b>22</b> | <b>263</b> | <b>49</b> | <b>56,338</b> |
| <sup>1</sup> Book value of investment                                       |                                       |               |                                  |               |           |            |           |               |
| <sup>2</sup> Original market value of investment                            |                                       |               |                                  |               |           |            |           |               |

## SERVICE TEST

The bank's Service Test performance is good.

### Retail Services

Comerica's delivery systems are accessible throughout the AA geographies and to individuals of different income levels and businesses of different revenue size. The distribution of the bank's 13 branch offices and 15 ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the AA census tracts by income level. Table 108 below summarizes the bank's retail locations in the AA.

**Table 108**

| Branch and Full-Service ATM Locations<br>Assessment Area: San Jose Metropolitan |                  |                 |                 |           |              |                   |              |
|---------------------------------------------------------------------------------|------------------|-----------------|-----------------|-----------|--------------|-------------------|--------------|
| Tract Income                                                                    | % of Geographies | % of Households | % of Businesses | Branches  |              | Full-Service ATMs |              |
|                                                                                 |                  |                 |                 | #         | %            | #                 | %            |
| Low                                                                             | 7.1              | 5.5             | 4.9             | 0         | 0.0          | 0                 | 0.0          |
| Moderate                                                                        | 21.8             | 19.1            | 18.0            | 1         | 7.7          | 1                 | 6.7          |
| Middle                                                                          | 40.4             | 43.4            | 39.0            | 6         | 46.2         | 7                 | 46.7         |
| Upper                                                                           | 30.4             | 32.0            | 37.9            | 6         | 46.2         | 7                 | 46.7         |
| Unknown                                                                         | 0.2              | 0.1             | 0.2             | 0         | 0.0          | 0                 | 0.0          |
| <b>Total</b>                                                                    | <b>100.0</b>     | <b>100.0</b>    | <b>100.0</b>    | <b>13</b> | <b>100.0</b> | <b>15</b>         | <b>100.0</b> |

The bank's branches are well distributed among the northwest portion of the AA. Though only a single branch is located within a moderate-income census tract, four additional branches are in very close proximity to and serve LMI geographies.

Comerica did not open or close any branches in the AA during the review period. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are materially the same throughout the AA.

### ***Community Development Services***

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for 17 organizations offering CD services targeted toward LMI individuals. The 118 CD services provided by bank representatives total approximately 481 hours. Examples of CD services performed include:

- A bank representative serving on the board of directors for an organization that provides transitional housing, career training, and mental and behavioral health support to formerly incarcerated individuals. A 100 percent of the individuals served are LMI.
- A bank employee serving on the board of directors for an organization that provides access to safe, stable, and affordable housing in an area of the AA where it is particularly difficult to acquire. The employee provides financial oversight and strategic planning services, aiding the organization in its ongoing efforts to address the lack of affordable housing in the area.

## METROPOLITAN AREAS (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE CALIFORNIA METROPOLITAN ASSESSMENT AREAS

The bank's branch operations and deposit market share for each metropolitan AA receiving a limited-scope review were determined as of April 1, 2023, and June 30, 2022, respectively.

- **Inland Empire MSA AA**

- The Inland Empire MSA AA is comprised of the entirety of San Bernadino and Riverside counties which make up the Riverside-San Bernadino-Ontario, CA MSA.
- The AA is comprised of 984 census tracts, including 48 low-, 282 moderate-, 362 middle-, 279 upper-, and 13 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 4,599,839, which reflects a 4.7 percent increase from the 2015 ACS data.
- The AA includes 1,029,309 families, 21.8 percent are low-, 17.5 percent moderate-, 19.3 percent middle-, and 41.4 percent are upper-income.
- The bank operated three branches, representing 0.7 percent of its branches.
- Comerica held \$104.5 million in deposits, representing a market share of 0.1 percent and 0.1 percent of its total deposits.

- **San Diego MSA AA**

- The San Diego MSA AA is comprised of the entirety of San Diego County which is coterminous with the San Diego-Chula Vista-Carlsbad, CA MSA.
- The AA is comprised of 737 census tracts, including 46 low-, 167 moderate-, 262 middle-, 248 upper-, and 14 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 3,298,634, which reflects a 2.3 percent increase from the 2015 ACS data.
- The AA includes 759,418 families, 22.8 percent are low-, 17.3 percent moderate-, 18.7 percent middle-, and 41.2 percent are upper-income.
- The bank operated 13 branches, representing 3.2 percent of its branches.
- Comerica held \$889.2 million in deposits, representing a market share of 0.6 percent and 1.2 percent of its total deposits.

- **San Francisco Bay Metropolitan AA**

- The San Francisco Bay Metropolitan AA is comprised of the entirety of Alameda, Contra Costa, San Francisco, and San Mateo counties which, along with Marin County (excluded from the AA) make up the San Francisco-Oakland-Berkeley, CA MSA.
- The AA is comprised of 1,039 census tracts, including 91 low-, 240 moderate-, 330 middle-, 337 upper-, and 41 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 4,486,687, which reflects a 5.1 percent increase from the 2015 ACS data.
- The AA includes 1,022,205 families, 23.5 percent are low-, 16.4 percent moderate-, 18.7 percent middle-, and 41.4 percent are upper-income.
- The bank operated 17 branches, representing 4.2 percent of its branches.
- Comerica held \$3.4 billion in deposits, representing a market share of 0.6 percent and 4.4 percent of its total deposits.

- **Santa Cruz MSA AA**

- The Santa Cruz MSA AA is comprised of the entirety of Santa Cruz County, which is coterminous with the Santa Cruz-Watsonville, CA MSA.
- The AA is comprised of 70 census tracts, which includes five low-, 12 moderate-, 29 middle-, 23 upper-, and one unknown-income tract.
- Based upon 2020 ACS data, the AA population was 270,861, which reflects a 0.6 percent increase from the 2015 ACS data.
- The AA includes 60,870 families, 22.1 percent are low-, 16.7 percent moderate-, 19.3 percent middle-, and 42.0 percent are upper-income.
- The bank operated six branches, representing 1.5 percent of its branches.
- Comerica held \$853.6 million in deposits, representing a market share of 9.6 percent and 1.1 percent of its total deposits.

- **Ventura County MSA AA**

- The Ventura County MSA AA is comprised of the entirety of Ventura County, which is coterminous with the Oxnard-Thousand Oaks-Ventura, CA MSA.
- The AA is comprised of 190 census tracts, including nine low-, 46 moderate-, 77 middle-, 55 upper-, and three unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 843,843, which reflects a 0.4 percent increase from the 2015 ACS data.
- The AA includes 196,312 families, 22.0 percent are low-, 16.5 percent moderate-, 20.8 percent middle-, and 40.7 percent are upper-income.
- The bank operated one branch, representing 0.2 percent of its branches.
- Comerica held \$58.1 million in deposits, representing a market share of 0.2 percent and 0.1 percent of its total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix D contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 109 discusses conclusions regarding the bank's performance.

**Table 109**

| Assessment Area                   | Lending Test | Investment Test | Service Test |
|-----------------------------------|--------------|-----------------|--------------|
| Inland Empire MSA AA              | Consistent   | Consistent      | Consistent   |
| San Diego MSA AA                  | Exceeds      | Consistent      | Exceeds      |
| San Francisco Bay Metropolitan AA | Consistent   | Consistent      | Exceeds      |
| Santa Cruz MSA AA                 | Below        | Below           | Below        |
| Ventura County MSA AA             | Consistent   | Consistent      | Consistent   |

The institution's lending, investment, service performance in the area is generally consistent with the institution's lending, investment, service performance in the state.

## **STATE OF FLORIDA**

### **CRA RATING FOR FLORIDA:**

|                               |                                          |
|-------------------------------|------------------------------------------|
| The Lending Test is Rated:    | <b>Satisfactory</b><br>High Satisfactory |
| The Investment Test is Rated: | High Satisfactory                        |
| The Service Test is Rated:    | High Satisfactory                        |

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness and record of serving the credit needs of the AAs' credit needs, including low-income individuals, low-income, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels and businesses of different revenue sizes is good.
- The bank has a relatively high level of CD loans.
- Comerica makes use of innovative and/or flexible lending practices in serving the AAs' needs.
- The bank is occasionally in a leadership position given its significant level of qualified CD investments and grants, particularly those not routinely provided by private investors.
- Comerica makes occasional use of innovative and/or complex investments to support CD initiatives.
- The bank exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

### **SCOPE OF THE EVALUATION**

The scope of the review for the state of Florida is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Comerica has two delineated AAs in the state of Florida: Fort Lauderdale-West Palm Beach Metropolitan AA and Naples MSA AA. The Fort Lauderdale-West Palm Beach Metropolitan AA was reviewed using full-scope procedures while the Naples MSA AA received a limited-scope review. Factors considered to determine the AA receiving a full-scope review include strategic importance of the AA to the bank operations; volume of lending; number of branches; percentage of total deposits; and length of time since the AA last received a full-scope review. Approximately 88.9 percent of lending activity (by number of loans), 90.6 percent of the total deposits, and 75.0 percent of total branches within the state of Florida were evaluated through the full-scope review.

## DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN FLORIDA

The bank delineates two of its 27 AAs and operates eight of its 409 branches in the state of Florida. As of June 30, 2022, the bank had \$424.6 million in deposits in the state, representing 0.6 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 0.1 percent and ranked 97<sup>th</sup> out of 186 FDIC-insured financial institutions across the state.

Of the 20,205 HMDA-reportable loans and 35,231 small business loans originated and purchased by Comerica during the review period, 432 HMDA-reportable loans (2.1 percent) and 368 small business loans (1.0 percent) were extended in the Florida AAs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The bank's Lending Test performance in the state of Florida is High Satisfactory. The Lending Test conclusions in the Fort Lauderdale-West Palm Beach Metropolitan AA are good, which is consistent with the overall state rating. The bank's performance in Naples MSA AA supports the state rating.

### Lending Activity

The bank's lending activities in the state of Florida reflect good responsiveness to the credit needs of the AAs. Comerica makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 207 SBA loans and 79 small business micro loans in the state of Florida.

As outlined in Table 110, Comerica extended 803 loans totaling \$329.0 million. The loan products and origination volumes appear consistent with the credit needs of the bank's AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period. The bank ranked 56<sup>th</sup> out of 275 CRA reporters and 118<sup>th</sup> of 1,197 HMDA reporters in its Florida AAs.

**Table 110**

| <b>Summary of Lending Activity – January 1, 2020 through December 31, 2022<br/>Florida Assessment Areas</b> |            |              |                |              |
|-------------------------------------------------------------------------------------------------------------|------------|--------------|----------------|--------------|
| <b>Loan Type</b>                                                                                            | <b>#</b>   | <b>%</b>     | <b>\$000s</b>  | <b>%</b>     |
| Home Purchase                                                                                               | 127        | 15.8         | 61,218         | 18.6         |
| Refinancing                                                                                                 | 148        | 18.4         | 86,950         | 26.4         |
| Home Improvement                                                                                            | 74         | 9.2          | 14,192         | 4.3          |
| Multifamily                                                                                                 | 4          | 0.5          | 52,786         | 16.0         |
| Other Purpose Lines of Credit                                                                               | 60         | 7.5          | 14,686         | 4.5          |
| Other Purpose Closed/Exempt                                                                                 | 19         | 2.4          | 21,058         | 6.4          |
| <b>Total HMDA-Related</b>                                                                                   | <b>432</b> | <b>53.8</b>  | <b>250,890</b> | <b>76.3</b>  |
| <b>Total Small Business</b>                                                                                 | <b>368</b> | <b>45.8</b>  | <b>77,827</b>  | <b>23.7</b>  |
| <b>Total Small Farm</b>                                                                                     | <b>3</b>   | <b>0.4</b>   | <b>235</b>     | <b>0.1</b>   |
| <b>TOTAL LOANS</b>                                                                                          | <b>803</b> | <b>100.0</b> | <b>328,952</b> | <b>100.0</b> |

### ***Geographic Distribution of Loans***

The overall geographic distribution of lending within the state of Florida reflects excellent penetration throughout the bank's AAs. This performance is consistent across the bank's Fort Lauderdale-West Palm Beach Metropolitan AA.

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different sizes. This performance is consistent across the bank's AA. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### ***Community Development Lending***

Comerica makes a relatively high level of CD loans, considering the bank's capacity and the need and availability of CD opportunities. As reflected in Table 111, the bank originated 16 CD loans totaling approximately \$38.6 million within the state, which comprises 1.2 percent of overall bank-wide CD loan volume by number and 0.7 percent by dollar amount.

While the number of qualified CD loans decreased slightly since the previous evaluation, the dollar amount of CD lending grew by 271.0 percent. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which made up approximately 36.4 percent of the bank's CD loans at the previous evaluation.

Comerica extended CD loans for a variety of purposes, as noted in Table 111. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 111**

| <b>Community Development Lending<br/>Florida Assessment Areas</b> |           |                 |
|-------------------------------------------------------------------|-----------|-----------------|
| <b>Purpose</b>                                                    | <b>#</b>  | <b>\$(000s)</b> |
| Affordable Housing                                                | 5         | 1,602           |
| Community Services                                                | 1         | 16,000          |
| Economic Development                                              | 9         | 20,757          |
| Revitalization and Stabilization                                  | 1         | 279             |
| <b>Total</b>                                                      | <b>16</b> | <b>38,638</b>   |

## **INVESTMENT TEST**

The bank's Investment Test rating is High Satisfactory. The Investment Test conclusions in the bank's Fort Lauderdale-West Palm Beach Metropolitan AA are good, which is consistent with the overall state rating. The bank's performance in the AA that received a limited-scope review was below the performance in the full-scope review area and the state.

The bank is occasionally in a leadership position given its significant level of qualified CD investments and grants. While Comerica makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs.

In addition to the investments made within the bank's AAs, Comerica also made three investments in a broader statewide area. The bank deposited \$250,000 in a minority-owned depository institution in conjunction with a mentor-protégé relationship focused on capacity building for the depository institution. The bank also made a large investment in a Small Business Investment Corporation, providing expertise, networking, and capital to help entrepreneurs build their small businesses to their full potential.

Specific details regarding CD investments and donations made within the bank's Florida AAs can be found in the Conclusions with Respect to Performance Tests section for each AA. In addition to the investments made within the bank's delineated AAs, the bank also made four investments totaling \$2.8 million in the border statewide area. These investments included \$1.3 million worth of deposits in minority-owned financial institutions and a \$1 million investment in a Small Business Investment Company that promotes economic development in the region by financing small businesses. As the bank was sufficiently responsive to the CD needs of its AAs, the qualified activity in which the bank engaged in the broader statewide area is favorably considered as representing the bank's overall responsiveness to CD needs.

**Table 112**

| Investments, Grants, and Donations<br>Florida Assessment Areas |                                       |               |                                  |              |            |            |            |               |
|----------------------------------------------------------------|---------------------------------------|---------------|----------------------------------|--------------|------------|------------|------------|---------------|
| Community Development Purpose                                  | Prior Period Investments <sup>1</sup> |               | Current Investments <sup>2</sup> |              | Donations  |            | Total      |               |
|                                                                | #                                     | \$(000s)      | #                                | \$(000s)     | #          | \$(000s)   | #          | \$(000s)      |
| Affordable Housing                                             | 10                                    | 15,429        | 2                                | 1,400        | 7          | 22         | 19         | 16,851        |
| Community Services                                             | 0                                     | 0             | 0                                | 0            | 84         | 399        | 84         | 399           |
| Economic Development                                           | 0                                     | 0             | 4                                | 2,750        | 23         | 131        | 27         | 2,881         |
| Revitalization and Stabilization                               | 0                                     | 0             | 0                                | 0            | 2          | 6          | 2          | 6             |
| <b>Total</b>                                                   | <b>10</b>                             | <b>15,429</b> | <b>6</b>                         | <b>4,150</b> | <b>116</b> | <b>558</b> | <b>132</b> | <b>20,137</b> |
| <sup>1</sup> Book value of investment                          |                                       |               |                                  |              |            |            |            |               |
| <sup>2</sup> Original market value of investment               |                                       |               |                                  |              |            |            |            |               |

## SERVICE TEST

The bank's performance under the Service Test is High Satisfactory. The Service Test conclusions in the Fort Lauderdale-West Palm Beach Metropolitan AA are good, which is consistent with the overall state rating. The bank's performance in the Naples AA, which received a limited-scope review, is consistent with the performance in the full-scope review areas and the state.

## Retail Services

Comerica's delivery systems are accessible to the AAs geographies and individuals of different income levels. During the review period, the bank opened one branch within the delineated Naples MSA AA. While this new branch is located within an upper-income census tract, the bank's record of opening or closing branches in the state has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the state, particularly in LMI geographies or to LMI individuals.



Refer to Table 113 for the distribution of banking offices and full-service ATMs by income level of geographies.

**Table 113**

| <b>Branch and Full-Service ATM Locations<br/>Florida Assessment Areas</b> |                             |                            |                            |                 |              |                          |              |
|---------------------------------------------------------------------------|-----------------------------|----------------------------|----------------------------|-----------------|--------------|--------------------------|--------------|
| <b>Tract<br/>Income</b>                                                   | <b>% of<br/>Geographies</b> | <b>% of<br/>Households</b> | <b>% of<br/>Businesses</b> | <b>Branches</b> |              | <b>Full-Service ATMs</b> |              |
|                                                                           |                             |                            |                            | <b>#</b>        | <b>%</b>     | <b>#</b>                 | <b>%</b>     |
| Low                                                                       | 5.9                         | 4.8                        | 3.2                        | 0               | 0.0          | 0                        | 0.0          |
| Moderate                                                                  | 26.6                        | 27.7                       | 23.5                       | 1               | 12.5         | 1                        | 14.3         |
| Middle                                                                    | 31.0                        | 32.2                       | 31.0                       | 2               | 25.0         | 2                        | 28.6         |
| Upper                                                                     | 33.6                        | 34.2                       | 40.7                       | 4               | 50.0         | 4                        | 57.1         |
| Unknown                                                                   | 2.9                         | 1.1                        | 1.6                        | 1               | 12.5         | 0                        | 0.0          |
| <b>Total</b>                                                              | <b>100.0</b>                | <b>100.0</b>               | <b>100.0</b>               | <b>8</b>        | <b>100.0</b> | <b>7</b>                 | <b>100.0</b> |

The bank also operates a mobile branch, which is located in its Naples Metropolitan AA. The mobile branch affords flexibility in providing retail banking services to customers in geographies not sufficiently served by the existing brick-and-mortar branches. As of April 1, 2023, the mobile branch is situated in an upper-income census tract, though the location is proximate to several moderate-income geographies that are reasonably served by the mobile branch.

### ***Community Development Services***

Comerica provides a relatively high level of CD services in its Florida AAs, which is consistent with its performance in the Fort Lauderdale-West Palm Beach Metropolitan AA. Bank representatives provided 466 CD services, totaling 1,166 hours, to 61 unique organizations within the state of Florida. This represents approximately 6.7 percent of Comerica's total CD services, despite only 1.0 percent of the bank's 7,382 employees are located in Florida. Details regarding CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.

**FORT LAUDERDALE – WEST PALM BEACH METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE FORT LAUDERDALE-WEST PALM BEACH METROPOLITAN ASSESSMENT AREA**

- The Fort Lauderdale-West Palm Beach Metropolitan AA consists of Palm Beach and Broward counties. These counties, along with Miami Dade County, which is excluded from the AA, make up the Miami-Fort Lauderdale-Pompano Beach, FL MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 790 census tracts, of which 5.7 percent are designated as low-income, 27.6 percent are moderate-income, 29.7 percent are middle-income, 34.1 percent are upper-income, and 2.9 percent are designated as unknown-income.
- As a result of the 2020 U.S. Census, the number of census tracts within the AA increase by 90 geographies (12.9 percent). Additionally, the income level designations of many existing census tracts changed, with census tracts designated as LMI increasing by 6.5 percent.
- Comerica operates six full-service branches in the AA, including one branch in moderate-income, two in middle-income, and three in upper-income census tracts.
- According to the June 30, 2022, FDIC Deposit Market Share Report, the bank had a 0.3 percent market share, ranking 29<sup>th</sup> out of 60 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 115<sup>th</sup> out of 1,047 HMDA reporters in the AA with 117 HMDA originations and purchases, and 52<sup>nd</sup> out of 244 CRA reporters with 89 CRA small business loans.
- A community contact indicated that affordable housing is scarce and a need for AA residents.

**Table 114**

| <b>Population Change</b>                                                                                    |                            |                            |                              |
|-------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|------------------------------|
| <b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b>                                        |                            |                            |                              |
| <b>Area</b>                                                                                                 | <b>2015<br/>Population</b> | <b>2020<br/>Population</b> | <b>Percentage<br/>Change</b> |
| Fort Lauderdale-West Palm Beach Metropolitan AA                                                             | 3,221,958                  | 3,436,566                  | 6.7                          |
| Broward County, FL                                                                                          | 1,843,152                  | 1,944,375                  | 5.5                          |
| Palm Beach County, FL                                                                                       | 1,378,806                  | 1,492,191                  | 8.2                          |
| Fort Lauderdale-Pompano Beach-Sunrise, FL MD                                                                | 1,843,152                  | 1,944,375                  | 5.5                          |
| West Palm Beach-Boca Raton-Boynton Beach, FL MD                                                             | 1,378,806                  | 1,492,191                  | 8.2                          |
| Florida                                                                                                     | 19,645,772                 | 21,538,187                 | 9.6                          |
| Source: 2020 U.S. Census Bureau Decennial Census<br>2011-2015 U.S. Census Bureau: American Community Survey |                            |                            |                              |

- Population trends between 2015 and 2020 reflect moderate growth throughout the AA, with all of the counties reporting more than 5 percent of population growth. Nonetheless, the state of Florida experienced a higher population growth.

**Table 115**

| Median Family Income Change<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                                                                                              |                           |                           |                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------------------------|-------------------|
| Area                                                                                                                                                                                                                      | 2015 Median Family Income | 2020 Median Family Income | Percentage Change |
| Fort Lauderdale-West Palm Beach Metropolitan AA                                                                                                                                                                           | 69,282                    | 76,223                    | 10.0              |
| Fort Lauderdale-Pompano Beach-Sunrise, FL MD<br><i>Broward County</i>                                                                                                                                                     | 67,531                    | 73,430                    | 8.7               |
| West Palm Beach-Boca Raton-Boynton Beach, FL MD<br><i>Palm Beach County</i>                                                                                                                                               | 72,016                    | 79,785                    | 10.8              |
| Florida                                                                                                                                                                                                                   | 62,828                    | 69,670                    | 10.9              |
| Source: 2011-2015 U.S. Census Bureau: American Community Survey<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars. |                           |                           |                   |

- The AA MFI grew at a rate comparable to the state MFI, with all of the AA counties and MDs reflecting MFIs greater than \$70,000 in 2020.
- Broward County and Fort Lauderdale-Pompano Beach-Sunrise, FL MD have slightly lower MFIs than other AA counties and MDs but exceed the state MFI.
- According to the 2022 FFIEC Census Data, 12 percent of AA households live below the poverty level. Additionally, a community contact stated that there are high poverty rates within the AA that adversely impact children and families.

**Table 116**

| Housing Cost Burden<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                                                                                      |                       |                 |             |                      |                 |            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area                                                                                                                                                                                                      | Cost Burden – Renters |                 |             | Cost Burden - Owners |                 |            |
|                                                                                                                                                                                                           | Low Income            | Moderate Income | All Renters | Low Income           | Moderate Income | All Owners |
| Fort Lauderdale-West Palm Beach Metropolitan AA                                                                                                                                                           | 85.2                  | 67.6            | 55.6        | 69.1                 | 42.6            | 29.9       |
| Fort Lauderdale-Pompano Beach-Sunrise, FL MD<br><i>Broward County</i>                                                                                                                                     | 86.4                  | 69.1            | 56.7        | 69.6                 | 44.3            | 31.3       |
| West Palm Beach-Boca Raton-Boynton Beach, FL MD<br><i>Palm Beach County</i>                                                                                                                               | 83.5                  | 65.3            | 54.1        | 68.5                 | 40.6            | 28.4       |
| Florida                                                                                                                                                                                                   | 80.5                  | 60.2            | 50.5        | 61.8                 | 36.3            | 24.1       |
| Cost burden is housing cost that equals 30 percent or more of household income.<br>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy |                       |                 |             |                      |                 |            |

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- Overall, the cost burden for renters and homeowners in the AA is greater than the housing cost burden for statewide Florida renters.
- A community contact indicated that affordable housing is at a premium and that there is not much incentive for developing affordable housing in the AA.
- The AA median housing value is \$291,000, which exceeds the statewide median housing value, at \$232,000.

**Table 117**

| <b>Unemployment Rates</b><br><b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b> |             |             |             |             |             |
|---------------------------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Region</b>                                                                                     | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| Fort Lauderdale-West Palm Beach Metropolitan AA                                                   | 3.6         | 3.2         | 9.0         | 4.7         | 2.9         |
| Fort Lauderdale-Pompano Beach-Sunrise, FL MD<br><i>Broward County</i>                             | 3.5         | 3.1         | 9.6         | 4.9         | 2.9         |
| West Palm Beach-Boca Raton-Boynton Beach, FL MD<br><i>Palm Beach County</i>                       | 3.7         | 3.4         | 8.2         | 4.3         | 2.9         |
| Florida                                                                                           | 3.7         | 3.2         | 8.2         | 4.6         | 2.9         |
| Source: Bureau of Labor Statistics: Local Area Unemployment Statistics                            |             |             |             |             |             |

- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to below pre-pandemic levels.
- Major employment industries within the AA include retail trade, healthcare and social assistance, and accommodation and food services.

Table 118 details selected AA characteristics.

**Table 118**

| 2022 Combined Demographics                                                                                                                                                               |                           |                       |                                    |           |                                                    |           |                           |           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                                                                                            |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                                                                                        | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                          | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                      | 45                        | 5.7                   | 33,645                             | 4.2       | 9,279                                              | 27.6      | 175,492                   | 22.0      |
| Moderate                                                                                                                                                                                 | 218                       | 27.6                  | 217,683                            | 27.2      | 31,226                                             | 14.3      | 143,372                   | 17.9      |
| Middle                                                                                                                                                                                   | 235                       | 29.7                  | 246,788                            | 30.9      | 17,102                                             | 6.9       | 146,276                   | 18.3      |
| Upper                                                                                                                                                                                    | 269                       | 34.1                  | 293,725                            | 36.7      | 12,330                                             | 4.2       | 334,200                   | 41.8      |
| Unknown                                                                                                                                                                                  | 23                        | 2.9                   | 7,499                              | 0.9       | 1,490                                              | 19.9      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                 | 790                       | 100.0                 | 799,340                            | 100.0     | 71,427                                             | 8.9       | 799,340                   | 100.0     |
|                                                                                                                                                                                          | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                          |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                          |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                      | 74,462                    | 28,528                | 3.4                                | 38.3      | 33,125                                             | 44.5      | 12,809                    | 17.2      |
| Moderate                                                                                                                                                                                 | 431,917                   | 198,311               | 23.8                               | 45.9      | 166,501                                            | 38.5      | 67,105                    | 15.5      |
| Middle                                                                                                                                                                                   | 462,879                   | 262,957               | 31.5                               | 56.8      | 133,231                                            | 28.8      | 66,691                    | 14.4      |
| Upper                                                                                                                                                                                    | 529,008                   | 336,753               | 40.4                               | 63.7      | 97,695                                             | 18.5      | 94,560                    | 17.9      |
| Unknown                                                                                                                                                                                  | 18,191                    | 7,357                 | 0.9                                | 40.4      | 6,082                                              | 33.4      | 4,752                     | 26.1      |
| Total AA                                                                                                                                                                                 | 1,516,457                 | 833,906               | 100.0                              | 55.0      | 436,634                                            | 28.8      | 245,917                   | 16.2      |
|                                                                                                                                                                                          | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                          |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                          | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                      | 10,171                    | 3.2                   | 9,342                              | 3.2       | 728                                                | 4.8       | 101                       | 2.5       |
| Moderate                                                                                                                                                                                 | 76,369                    | 24.4                  | 71,095                             | 24.2      | 4,531                                              | 29.8      | 743                       | 18.5      |
| Middle                                                                                                                                                                                   | 92,998                    | 29.7                  | 88,123                             | 29.9      | 3,837                                              | 25.2      | 1,038                     | 25.8      |
| Upper                                                                                                                                                                                    | 128,822                   | 41.1                  | 121,372                            | 41.2      | 5,400                                              | 35.5      | 2,050                     | 50.9      |
| Unknown                                                                                                                                                                                  | 5,151                     | 1.6                   | 4,352                              | 1.5       | 707                                                | 4.7       | 92                        | 2.3       |
| Total AA                                                                                                                                                                                 | 313,511                   | 100.0                 | 294,284                            | 100.0     | 15,203                                             | 100.0     | 4,024                     | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                          |                           |                       |                                    | 93.9      |                                                    | 4.8       |                           | 1.3       |
|                                                                                                                                                                                          | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                          |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                          | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                      | 34                        | 2.2                   | 28                                 | 1.9       | 6                                                  | 10.5      | 0                         | 0.0       |
| Moderate                                                                                                                                                                                 | 240                       | 15.8                  | 227                                | 15.5      | 13                                                 | 22.8      | 0                         | 0.0       |
| Middle                                                                                                                                                                                   | 469                       | 30.9                  | 456                                | 31.2      | 13                                                 | 22.8      | 0                         | 0.0       |
| Upper                                                                                                                                                                                    | 762                       | 50.2                  | 739                                | 50.6      | 23                                                 | 40.4      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                  | 13                        | 0.9                   | 11                                 | 0.8       | 2                                                  | 3.5       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                 | 1,518                     | 100.0                 | 1,461                              | 100.0     | 57                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                               |                           |                       |                                    | 96.2      |                                                    | 3.8       |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding |                           |                       |                                    |           |                                                    |           |                           |           |

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the AA is good. For this evaluation, the bank's home mortgage and small business lending carried similar weight. Additionally, home purchases and home refinance lending are the only home mortgage loan products to be separately evaluated, as the remaining products had insufficient volume to conduct a meaningful analysis.

Appendix C details the bank's 2020 mortgage and small business lending activity, as well as the corresponding aggregate data.

#### **Lending Activity**

The bank's lending activity in the AA reflects good responsiveness to credit needs. Comerica makes use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 194 SBA loans and 73 small business micro loans.

For this evaluation, the total volume of loans in consisted of 368 home mortgage and 343 small business loans originated between January 1, 2020, and December 31, 2022. The loan products and origination volumes appear consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

#### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of small business lending and mortgage lending was compared with available demographic and aggregate data. Comerica's geographic distribution of loans reflects excellent penetration throughout the AA. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects excellent penetration throughout the AA. The 2021 and 2022 distribution of home mortgage loans among low-income census tracts is comparable to aggregate data and the demographic figure, while it substantially exceeded these figures in moderate-income census tracts. Comerica's significant level of home mortgage lending in LMI census tracts reflects the bank's targeted efforts to meet the AA credit needs.

The bank's 2020 lending performance is consistent with the 2021 and 2022 geographic distribution of loans, as it exceeded aggregate and demographic data.

#### ***Home Purchase Lending***

The geographic distribution of home purchase lending is excellent. The bank's 2021 and 2022 distribution of home purchase loans among low-income census tracts is greater than that of aggregate lending data and slightly above the percentage of owner-occupied housing units

located in these tracts (the demographic figure). Loan distribution among moderate-income geographies, is even better, as the bank originated a substantially higher percentage of home purchase loans in moderate-income census tracts than aggregate lenders. While moderate-income census tracts contained almost one quarter of the owner-occupied units in the AA, Comerica originated home purchase loans at a rate approximately three times higher than this figure.

The bank's 2020 lending performance is consistent with the 2021 and 2022 loan distribution, doubling aggregate data.

#### *Home Refinance Lending*

The geographic distribution of the bank's home refinance lending in the AA is excellent. The 2021 distribution of home refinance loans among low-income census tracts is above aggregate data and the demographic figure, though the 2022 distribution of lending is comparable to the aggregate data and below the demographic figure. Comerica's 2021 and 2022 distribution of home refinance lending among moderate-income census tracts is substantially greater than aggregate data and the demographic figure.

The bank's 2020 lending performance is consistent with its 2021 and 2022 distribution of loans, with comparable performance in low-income tracts to aggregate data and materially exceeding than the lending distribution of aggregate lenders in moderate-income geographies.

Table 119A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                   | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                               | 3                                | 7.5   | 3.2   | 656     | 4.2   | 2.1   | 2    | 5.4   | 3.0   | 292     | 1.6   | 1.6   | 3.4                          |
| Moderate                                                                                                                                          | 29                               | 72.5  | 23.8  | 7,045   | 45.5  | 15.8  | 28   | 75.7  | 26.9  | 7,513   | 41.9  | 17.0  | 23.8                         |
| Middle                                                                                                                                            | 4                                | 10.0  | 33.9  | 459     | 3.0   | 27.9  | 0    | 0.0   | 31.8  | 0       | 0.0   | 26.7  | 31.5                         |
| Upper                                                                                                                                             | 4                                | 10.0  | 38.9  | 7,320   | 47.3  | 53.1  | 7    | 18.9  | 37.7  | 10,137  | 56.5  | 53.2  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.1   | 0       | 0.0   | 1.1   | 0    | 0.0   | 0.7   | 0       | 0.0   | 1.5   | 0.9                          |
| Total                                                                                                                                             | 40                               | 100.0 | 100.0 | 15,480  | 100.0 | 100.0 | 37   | 100.0 | 100.0 | 17,942  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                               | 2                                | 5.0   | 1.8   | 291     | 1.6   | 1.2   | 0    | 0.0   | 1.9   | 0       | 0.0   | 1.0   | 3.4                          |
| Moderate                                                                                                                                          | 14                               | 35.0  | 17.4  | 3,049   | 16.4  | 12.2  | 10   | 32.3  | 21.5  | 2,731   | 17.9  | 13.4  | 23.8                         |
| Middle                                                                                                                                            | 12                               | 30.0  | 34.0  | 2,846   | 15.3  | 28.2  | 5    | 16.1  | 32.6  | 3,920   | 25.7  | 25.7  | 31.5                         |
| Upper                                                                                                                                             | 12                               | 30.0  | 46.8  | 12,377  | 66.7  | 57.8  | 16   | 51.6  | 43.3  | 8,596   | 56.4  | 57.8  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.7   | 0       | 0.0   | 2.1   | 0.9                          |
| Total                                                                                                                                             | 40                               | 100.0 | 100.0 | 18,563  | 100.0 | 100.0 | 31   | 100.0 | 100.0 | 15,247  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                               | 0                                | 0.0   | 1.6   | 0       | 0.0   | 1.1   | 0    | 0.0   | 1.2   | 0       | 0.0   | 0.7   | 3.4                          |
| Moderate                                                                                                                                          | 1                                | 5.9   | 12.6  | 20      | 0.5   | 8.7   | 4    | 14.8  | 14.7  | 670     | 14.5  | 8.8   | 23.8                         |
| Middle                                                                                                                                            | 6                                | 35.3  | 28.5  | 625     | 16.3  | 21.1  | 12   | 44.4  | 29.6  | 1,634   | 35.4  | 21.6  | 31.5                         |
| Upper                                                                                                                                             | 10                               | 58.8  | 57.2  | 3,186   | 83.2  | 68.5  | 11   | 40.7  | 53.7  | 2,318   | 50.2  | 65.5  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.7   | 0       | 0.0   | 3.4   | 0.9                          |
| Total                                                                                                                                             | 17                               | 100.0 | 100.0 | 3,831   | 100.0 | 100.0 | 27   | 100.0 | 100.0 | 4,622   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-Family<br>Units %      |
| Low                                                                                                                                               | 0                                | 0.0   | 14.2  | 0       | 0.0   | 7.2   | 0    | 0.0   | 7.7   | 0       | 0.0   | 3.6   | 7.8                          |
| Moderate                                                                                                                                          | 1                                | 100.0 | 45.8  | 8,640   | 100.0 | 26.4  | 1    | 100.0 | 41.3  | 28,000  | 100.0 | 40.3  | 33.5                         |
| Middle                                                                                                                                            | 0                                | 0.0   | 21.3  | 0       | 0.0   | 34.7  | 0    | 0.0   | 24.3  | 0       | 0.0   | 28.4  | 28.7                         |
| Upper                                                                                                                                             | 0                                | 0.0   | 18.3  | 0       | 0.0   | 31.7  | 0    | 0.0   | 23.0  | 0       | 0.0   | 19.1  | 28.1                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.0   | 0    | 0.0   | 3.8   | 0       | 0.0   | 8.6   | 1.9                          |
| Total                                                                                                                                             | 1                                | 100.0 | 100.0 | 8,640   | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 28,000  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                               | 6                                | 5.1   | 2.4   | 3,527   | 6.6   | 1.8   | 3    | 2.6   | 2.4   | 345     | 0.4   | 1.5   | 3.4                          |
| Moderate                                                                                                                                          | 49                               | 41.5  | 20.1  | 19,580  | 36.7  | 14.1  | 45   | 38.5  | 23.5  | 39,102  | 50.5  | 16.4  | 23.8                         |
| Middle                                                                                                                                            | 27                               | 22.9  | 33.6  | 5,047   | 9.5   | 27.6  | 25   | 21.4  | 31.6  | 8,863   | 11.5  | 25.6  | 31.5                         |
| Upper                                                                                                                                             | 36                               | 30.5  | 43.8  | 25,203  | 47.2  | 55.5  | 44   | 37.6  | 41.7  | 29,047  | 37.5  | 53.9  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.1   | 0       | 0.0   | 1.0   | 0    | 0.0   | 0.7   | 0       | 0.0   | 2.6   | 0.9                          |
| Total                                                                                                                                             | 118                              | 100.0 | 100.0 | 53,357  | 100.0 | 100.0 | 117  | 100.0 | 100.0 | 77,357  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |



Table 119B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                   | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                               | 0                                | 0.0   | 1.1   | 0       | 0.0   | 0.6   | 1    | 5.6   | 1.2   | 53      | 0.8   | 0.5   | 3.4                          |
| Moderate                                                                                                                                          | 0                                | 0.0   | 10.6  | 0       | 0.0   | 6.3   | 1    | 5.6   | 13.9  | 133     | 2.1   | 7.2   | 23.8                         |
| Middle                                                                                                                                            | 3                                | 27.3  | 28.2  | 259     | 16.9  | 18.5  | 8    | 44.4  | 29.5  | 3,309   | 52.8  | 20.8  | 31.5                         |
| Upper                                                                                                                                             | 8                                | 72.7  | 60.1  | 1,270   | 83.1  | 74.6  | 8    | 44.4  | 54.5  | 2,775   | 44.3  | 70.3  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.9   | 0       | 0.0   | 1.2   | 0.9                          |
| Tract-Unk                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                             | 11                               | 100.0 | 100.0 | 1,529   | 100.0 | 100.0 | 18   | 100.0 | 100.0 | 6,270   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                               | 1                                | 11.1  | 1.4   | 2,580   | 48.6  | 0.7   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.2   | 3.4                          |
| Moderate                                                                                                                                          | 4                                | 44.4  | 13.9  | 826     | 15.5  | 3.4   | 1    | 33.3  | 15.7  | 55      | 1.0   | 3.5   | 23.8                         |
| Middle                                                                                                                                            | 2                                | 22.2  | 23.9  | 858     | 16.1  | 8.4   | 0    | 0.0   | 26.7  | 0       | 0.0   | 12.8  | 31.5                         |
| Upper                                                                                                                                             | 2                                | 22.2  | 60.2  | 1,050   | 19.8  | 79.6  | 2    | 66.7  | 54.6  | 5,221   | 99.0  | 72.6  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.6   | 0       | 0.0   | 8.0   | 0    | 0.0   | 1.3   | 0       | 0.0   | 10.8  | 0.9                          |
| Tract-Unk                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                             | 9                                | 100.0 | 100.0 | 5,314   | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 5,276   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                               | 0                                | 0.0   | 3.7   | 0       | 0.0   | 2.2   | 0    | 0.0   | 1.5   | 0       | 0.0   | 0.9   | 3.4                          |
| Moderate                                                                                                                                          | 0                                | 0.0   | 29.6  | 0       | 0.0   | 15.9  | 0    | 0.0   | 32.8  | 0       | 0.0   | 23.1  | 23.8                         |
| Middle                                                                                                                                            | 0                                | 0.0   | 40.4  | 0       | 0.0   | 51.9  | 0    | 0.0   | 37.0  | 0       | 0.0   | 37.3  | 31.5                         |
| Upper                                                                                                                                             | 0                                | 0.0   | 26.2  | 0       | 0.0   | 29.9  | 0    | 0.0   | 27.8  | 0       | 0.0   | 37.3  | 40.4                         |
| Unknown                                                                                                                                           | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 1.0   | 0       | 0.0   | 1.4   | 0.9                          |
| Tract-Unk                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                             | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects good penetration throughout the AA. The distribution of 2021 small business loans among low-income census tracts is significantly greater than aggregate data and the demographic figure. Among moderate-income census tracts, the distribution of 2021 loans is comparable to the aggregate data and the percentage of businesses located in these tracts. Additionally, the bank's dispersion of 2022 small business loans among LMI census tracts is also comparable to both metrics.

Comerica's 2020 small business lending performance is consistent with the bank's performance in 2021 and 2022.

Table 120

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 12                               | 13.3  | 5.6   | 2,127   | 11.4  | 7.5   | 3    | 3.4   | 3.3   | 941     | 4.2   | 4.0   | 3.2                      |
| Moderate                                                                                                                                                                                  | 22                               | 24.4  | 24.5  | 6,365   | 34.0  | 25.9  | 21   | 23.6  | 24.8  | 4,846   | 21.4  | 26.0  | 24.4                     |
| Middle                                                                                                                                                                                    | 16                               | 17.8  | 29.8  | 4,687   | 25.0  | 27.9  | 27   | 30.3  | 29.1  | 6,588   | 29.1  | 27.3  | 29.7                     |
| Upper                                                                                                                                                                                     | 39                               | 43.3  | 39.6  | 5,513   | 29.4  | 38.2  | 28   | 31.5  | 41.0  | 7,729   | 34.1  | 40.0  | 41.1                     |
| Unknown                                                                                                                                                                                   | 1                                | 1.1   | 0.2   | 37      | 0.2   | 0.4   | 10   | 11.2  | 1.5   | 2,554   | 11.3  | 2.6   | 1.6                      |
| Total                                                                                                                                                                                     | 90                               | 100.0 | 100.0 | 18,729  | 100.0 | 100.0 | 89   | 100.0 | 100.0 | 22,658  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to individuals of different income levels and businesses of different revenue sizes is good. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### Residential Real Estate (HMDA) Lending

Home mortgage lending by borrower income in the is good when compared to demographic and aggregate data. The 2021 distribution of the bank's home mortgage loans among low-income borrowers is comparable to aggregate data, while the bank's lending to moderate-income borrowers almost doubles aggregate data and exceeds the demographic figure. Aggregate data serves as a better proxy for loan demand than the demographic figure.

The distribution of the bank's lending among LMI borrowers decreased in 2022. Home mortgage lending among low-income borrowers was slightly below the aggregate data; however, lending to moderate-income borrowers was significantly below aggregated and demographic data. Given the scarcity of affordable housing in the AA and rising interest rates, the bank's performance is good.

The bank's 2020 lending performance is consistent with that of 2021, as the distribution of loans to LMI borrowers is comparable to aggregate data.

Table 121A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                   | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                               | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                               | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                               | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                           | 2                                | 5.0   | 2.9   | 221     | 1.4   | 1.0   | 0    | 0.0   | 2.7   | 0       | 0.0   | 0.9   | 22.0                              |
| Moderate                                                                                                                                      | 11                               | 27.5  | 12.8  | 2,235   | 14.4  | 6.9   | 2    | 5.4   | 11.0  | 515     | 2.9   | 5.1   | 17.9                              |
| Middle                                                                                                                                        | 12                               | 30.0  | 19.8  | 2,817   | 18.2  | 14.4  | 15   | 40.5  | 18.3  | 3,166   | 17.6  | 12.5  | 18.3                              |
| Upper                                                                                                                                         | 14                               | 35.0  | 48.7  | 5,207   | 33.6  | 61.5  | 18   | 48.6  | 49.9  | 8,691   | 48.4  | 63.2  | 41.8                              |
| Unknown                                                                                                                                       | 1                                | 2.5   | 15.9  | 5,000   | 32.3  | 16.3  | 2    | 5.4   | 18.0  | 5,570   | 31.0  | 18.3  | 0.0                               |
| Total                                                                                                                                         | 40                               | 100.0 | 100.0 | 15,480  | 100.0 | 100.0 | 37   | 100.0 | 100.0 | 17,942  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                           | 2                                | 5.0   | 3.0   | 319     | 1.7   | 1.4   | 2    | 6.5   | 6.6   | 204     | 1.3   | 3.3   | 22.0                              |
| Moderate                                                                                                                                      | 14                               | 35.0  | 11.8  | 2,588   | 13.9  | 6.8   | 4    | 12.9  | 15.2  | 791     | 5.2   | 8.4   | 17.9                              |
| Middle                                                                                                                                        | 5                                | 12.5  | 19.4  | 938     | 5.1   | 14.6  | 7    | 22.6  | 21.0  | 1,145   | 7.5   | 14.8  | 18.3                              |
| Upper                                                                                                                                         | 18                               | 45.0  | 47.9  | 14,498  | 78.1  | 58.8  | 17   | 54.8  | 42.9  | 12,357  | 81.0  | 55.1  | 41.8                              |
| Unknown                                                                                                                                       | 1                                | 2.5   | 17.9  | 220     | 1.2   | 18.3  | 1    | 3.2   | 14.2  | 750     | 4.9   | 18.4  | 0.0                               |
| Total                                                                                                                                         | 40                               | 100.0 | 100.0 | 18,563  | 100.0 | 100.0 | 31   | 100.0 | 100.0 | 15,247  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                           | 0                                | 0.0   | 3.2   | 0       | 0.0   | 2.1   | 0    | 0.0   | 3.7   | 0       | 0.0   | 1.8   | 22.0                              |
| Moderate                                                                                                                                      | 2                                | 11.8  | 8.2   | 78      | 2.0   | 4.4   | 2    | 7.4   | 8.9   | 184     | 4.0   | 4.2   | 17.9                              |
| Middle                                                                                                                                        | 3                                | 17.6  | 15.6  | 642     | 16.8  | 10.1  | 7    | 25.9  | 17.6  | 931     | 20.1  | 10.0  | 18.3                              |
| Upper                                                                                                                                         | 12                               | 70.6  | 68.8  | 3,111   | 81.2  | 78.1  | 18   | 66.7  | 66.2  | 3,507   | 75.9  | 76.0  | 41.8                              |
| Unknown                                                                                                                                       | 0                                | 0.0   | 4.1   | 0       | 0.0   | 5.3   | 0    | 0.0   | 3.7   | 0       | 0.0   | 7.9   | 0.0                               |
| Total                                                                                                                                         | 17                               | 100.0 | 100.0 | 3,831   | 100.0 | 100.0 | 27   | 100.0 | 100.0 | 4,622   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                           | 4                                | 3.4   | 3.0   | 540     | 1.2   | 1.2   | 4    | 3.4   | 4.1   | 416     | 0.8   | 1.6   | 22.0                              |
| Moderate                                                                                                                                      | 30                               | 25.6  | 12.0  | 5,223   | 11.7  | 6.6   | 8    | 6.9   | 11.9  | 1,490   | 3.0   | 5.9   | 17.9                              |
| Middle                                                                                                                                        | 24                               | 20.5  | 19.2  | 5,129   | 11.5  | 13.9  | 30   | 25.9  | 18.8  | 5,302   | 10.7  | 12.4  | 18.3                              |
| Upper                                                                                                                                         | 56                               | 47.9  | 49.0  | 26,025  | 58.2  | 60.7  | 70   | 60.3  | 49.7  | 35,329  | 71.6  | 61.8  | 41.8                              |
| Unknown                                                                                                                                       | 3                                | 2.6   | 16.8  | 7,800   | 17.4  | 17.6  | 4    | 3.4   | 15.5  | 6,820   | 13.8  | 18.2  | 0.0                               |
| Total                                                                                                                                         | 117                              | 100.0 | 100.0 | 44,717  | 100.0 | 100.0 | 116  | 100.0 | 100.0 | 49,357  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table 121B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 3.8   | 0       | 0.0   | 2.6   | 1    | 5.6   | 3.5   | 157     | 2.5   | 1.7   | 22.0                              |
| Moderate                                                                                                                                                    | 2                                | 18.2  | 9.8   | 247     | 16.2  | 4.7   | 0    | 0.0   | 9.0   | 0       | 0.0   | 4.1   | 17.9                              |
| Middle                                                                                                                                                      | 1                                | 9.1   | 16.0  | 100     | 6.5   | 8.8   | 1    | 5.6   | 17.0  | 60      | 1.0   | 9.4   | 18.3                              |
| Upper                                                                                                                                                       | 8                                | 72.7  | 66.8  | 1,182   | 77.3  | 81.4  | 15   | 83.3  | 65.0  | 5,553   | 88.6  | 79.3  | 41.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 3.6   | 0       | 0.0   | 2.5   | 1    | 5.6   | 5.5   | 500     | 8.0   | 5.5   | 0.0                               |
| Total                                                                                                                                                       | 11                               | 100.0 | 100.0 | 1,529   | 100.0 | 100.0 | 18   | 100.0 | 100.0 | 6,270   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 4.8   | 0       | 0.0   | 1.0   | 1    | 33.3  | 6.2   | 55      | 1.0   | 1.5   | 22.0                              |
| Moderate                                                                                                                                                    | 1                                | 11.1  | 8.4   | 75      | 1.4   | 1.2   | 0    | 0.0   | 9.6   | 0       | 0.0   | 3.5   | 17.9                              |
| Middle                                                                                                                                                      | 3                                | 33.3  | 12.0  | 632     | 11.9  | 2.2   | 0    | 0.0   | 14.1  | 0       | 0.0   | 2.7   | 18.3                              |
| Upper                                                                                                                                                       | 4                                | 44.4  | 63.8  | 2,027   | 38.1  | 70.5  | 2    | 66.7  | 57.1  | 5,221   | 99.0  | 68.2  | 41.8                              |
| Unknown                                                                                                                                                     | 1                                | 11.1  | 10.9  | 2,580   | 48.6  | 25.1  | 0    | 0.0   | 13.0  | 0       | 0.0   | 24.1  | 0.0                               |
| Total                                                                                                                                                       | 9                                | 100.0 | 100.0 | 5,314   | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 5,276   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 1.3   | 0       | 0.0   | 0.4   | 0    | 0.0   | 3.2   | 0       | 0.0   | 2.1   | 22.0                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 1.4   | 0       | 0.0   | 0.6   | 0    | 0.0   | 1.3   | 0       | 0.0   | 1.2   | 17.9                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 1.4   | 0       | 0.0   | 1.3   | 0    | 0.0   | 1.0   | 0       | 0.0   | 1.2   | 18.3                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.5   | 0       | 0.0   | 0.8   | 41.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 95.4  | 0       | 0.0   | 97.4  | 0    | 0.0   | 94.0  | 0       | 0.0   | 94.7  | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

The borrower distribution of small business loans by revenue size of businesses is adequate. In 2021, the bank outperformed aggregate data by number and dollar amount of originations, though remained well below the large percentage of AA businesses reporting annual revenues of \$1 million or less. Aggregate data serves as a better proxy for loan demand than the demographic figure.

The distribution of 2022 loan originations to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA and aggregate data by number of originations. However, the bank exceeded aggregate data by dollar amount, which is reflective of Comerica's willingness to lend larger sums to small businesses.

The bank's 2020 lending performance exceed that of 2021 and 2022. The decline in performance is primarily attributed to the cessation of the SBA's PPP and rising interests.

Table 122

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 44                               | 48.9  | 43.5  | 6,843   | 36.5  | 24.5  | 35   | 39.3  | 52.7  | 9,877   | 43.6  | 38.3  | 93.9                     |
| Over \$1 Million                                                                   | 28                               | 31.1  |       | 9,897   | 52.8  |       | 39   | 43.8  |       | 9,086   | 40.1  |       | 4.8                      |
| Revenue Unknown                                                                    | 18                               | 20.0  |       | 1,989   | 10.6  |       | 15   | 16.9  |       | 3,695   | 16.3  |       | 1.3                      |
| Total                                                                              | 90                               | 100.0 |       | 18,729  | 100.0 |       | 89   | 100.0 |       | 22,658  | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 51                               | 56.7  | 94.7  | 2,213   | 11.8  | 47.8  | 46   | 51.7  | 96.1  | 1,818   | 8.0   | 52.9  |                          |
| \$100,001 - \$250,000                                                              | 16                               | 17.8  | 3.4   | 2,947   | 15.7  | 18.6  | 15   | 16.9  | 2.4   | 2,937   | 13.0  | 15.4  |                          |
| \$250,001 - \$1 Million                                                            | 23                               | 25.6  | 1.9   | 13,569  | 72.4  | 33.5  | 28   | 31.5  | 1.5   | 17,903  | 79.0  | 31.6  |                          |
| Total                                                                              | 90                               | 100.0 | 100.0 | 18,729  | 100.0 | 100.0 | 89   | 100.0 | 100.0 | 22,658  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 28                               | 63.6  |       | 1,327   | 19.4  |       | 17   | 48.6  |       | 588     | 6.0   |       |                          |
| \$100,001 - \$250,000                                                              | 8                                | 18.2  |       | 1,435   | 21.0  |       | 6    | 17.1  |       | 1,117   | 11.3  |       |                          |
| \$250,001 - \$1 Million                                                            | 8                                | 18.2  |       | 4,081   | 59.6  |       | 12   | 34.3  |       | 8,172   | 82.7  |       |                          |
| Total                                                                              | 44                               | 100.0 |       | 6,843   | 100.0 |       | 35   | 100.0 |       | 9,877   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### Community Development Lending

The bank makes a relatively high level of CD loans in the AA. Comerica originated 16 CD loans totaling \$38.6 million in the AA, making up 1.2 percent of bank-wide CD loan volume by number and 0.7 percent by dollar amount. The number volume of CD loans originated in the AA decreased by 11.1 percent since the previous evaluation, though the dollar amount increased by more than 310.4 percent. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which represented 38.9 percent of CD loans in the AA at the previous evaluation.

The largest portion of the bank's CD lending in the AA promotes economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Examples of the bank's CD lending activities that are considered responsive to credit needs in the AA include:

- A \$16 million line of credit to a certified home healthcare and senior care provider that provides essential medical care to Medicaid recipients in a variety of regions throughout the state of Florida, including the AA.
- A \$3.8 million line of credit for the construction of an apartment project in the AA where the city of Delray Beach requires 25 percent of the total units to be set aside for LMI residents, granting prorated CD qualification in the amount of \$952,000.

**Table 123**

| <b>Community Development Lending</b>                                 |           |               |
|----------------------------------------------------------------------|-----------|---------------|
| <b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b> |           |               |
| <b>Purpose</b>                                                       | <b>#</b>  | <b>\$000s</b> |
| Affordable Housing                                                   | 5         | 1,602         |
| Community Services                                                   | 1         | 16,000        |
| Economic Development                                                 | 9         | 20,757        |
| Revitalization and Stabilization                                     | 1         | 279           |
| <b>Total</b>                                                         | <b>16</b> | <b>38,638</b> |

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is good. Comerica is occasionally in a leadership position, as its level of qualified CD investments and grants is significant, particularly those not routinely provided by private investors. The bank's overall level of CD qualified investments and donations decreased since the previous evaluation. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank's activity exhibits good responsiveness to identified needs in the AA. Comerica's qualified CD investments in the AA focus on the need for affordable housing and consist entirely of LIHTC investments; however, the donations were made for a variety of purposes. Examples of the bank's CD donations that were responsive to the AA needs include:

- A recurring donation totaling \$65,000 to an organization that facilitates financial education programs as well as business, entrepreneurship, and career workshops to students in more than 400 local schools where 85 percent of students qualify for free or reduced-price lunches.
- Donations totaling \$20,000 to an organization that responds to the current food crisis among LMI individuals, especially seniors and disabled individuals.
- Donations totaling \$20,000 to a CD corporation that serves the AA in a variety of ways, including providing financial education to LMI youth as well as organizing a small business program for businesses operating in and employing LMI residents.

**Table 124**

| <b>Investment, Grants, and Donations</b>                             |                                             |                  |                                        |                  |                  |                  |              |                  |
|----------------------------------------------------------------------|---------------------------------------------|------------------|----------------------------------------|------------------|------------------|------------------|--------------|------------------|
| <b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b> |                                             |                  |                                        |                  |                  |                  |              |                  |
| <b>Community Development Purpose</b>                                 | <b>Prior Period Investments<sup>1</sup></b> |                  | <b>Current Investments<sup>2</sup></b> |                  | <b>Donations</b> |                  | <b>Total</b> |                  |
|                                                                      | <b>#</b>                                    | <b>\$ (000s)</b> | <b>#</b>                               | <b>\$ (000s)</b> | <b>#</b>         | <b>\$ (000s)</b> | <b>#</b>     | <b>\$ (000s)</b> |
| Affordable Housing                                                   | 10                                          | 15,429           | 1                                      | 400              | 4                | 19               | 15           | 15,848           |
| Community Services                                                   | 0                                           | 0                | 0                                      | 0                | 51               | 272              | 51           | 272              |
| Economic Development                                                 | 0                                           | 0                | 0                                      | 0                | 17               | 99               | 17           | 99               |
| Revitalization and Stabilization                                     | 0                                           | 0                | 0                                      | 0                | 2                | 6                | 2            | 6                |
| <b>Total</b>                                                         | <b>10</b>                                   | <b>15,429</b>    | <b>1</b>                               | <b>400</b>       | <b>74</b>        | <b>396</b>       | <b>85</b>    | <b>16,225</b>    |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

The bank's Service Test performance is good.

### *Retail Services*

Comerica's delivery systems are accessible to the AA geographies and individuals of different income levels. The distribution of the bank's six branch offices and five ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the tract categories within the AA. Table 125 below summarizes the bank's retail locations in the AA.

**Table 125**

| Branch and Full-Service ATM Locations<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan |                     |                    |                    |          |              |                   |              |
|--------------------------------------------------------------------------------------------------------|---------------------|--------------------|--------------------|----------|--------------|-------------------|--------------|
| Tract<br>Income                                                                                        | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches |              | Full-Service ATMs |              |
|                                                                                                        |                     |                    |                    | #        | %            | #                 | %            |
| Low                                                                                                    | 5.7                 | 4.9                | 3.2                | 0        | 0.0          | 0                 | 0.0          |
| Moderate                                                                                               | 27.6                | 28.7               | 24.3               | 1        | 16.7         | 1                 | 20.0         |
| Middle                                                                                                 | 29.7                | 31.2               | 29.7               | 2        | 33.3         | 2                 | 40.0         |
| Upper                                                                                                  | 34.1                | 34.2               | 41.1               | 3        | 50.0         | 2                 | 40.0         |
| Unknown                                                                                                | 2.9                 | 1.1                | 1.6                | 0        | 0.0          | 0                 | 0.0          |
| <b>Total</b>                                                                                           | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>6</b> | <b>100.0</b> | <b>5</b>          | <b>100.0</b> |

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations do not vary in a way that inconveniences the AA, as the level of services and hours offered are materially the same throughout the AA.

### *Community Development Services*

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for 40 community organizations that offer CD services targeted to LMI individuals. During the review period, bank employees provided 228 CD services totaling 613 hours. Examples of services performed include:

- Several bank employees served as subject matter experts for an organization that provides financial education and professional counseling to LMI families in financial crisis.
- Bank employees provided technical assistance on behalf of Habitat for Humanity by underwriting loan applications submitted for affordable housing in the AA.
- A bank employee served on the board of directors of a nonprofit organization with a mission of providing essential products to underprivileged youth and LMI veterans

**METROPOLITAN ASSESSMENT AREA (LIMITED-SCOPE REVIEW)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE FLORIDA METROPOLITAN ASSESSMENT AREA**

- **Naples MSA AA**
  - The Naples MSA AA is comprised of the entirety of Collier County, which is coterminous with the Naples-Marco Island, FL MSA.
  - The AA is comprised of 109 census tracts, including eight low-, 21 moderate-, 44 middle-, 33 upper-, and three unknown-income tracts.
  - Based upon 2020 ACS data, the AA population was 375,752, which reflects a 10.2 percent increase from the 2015 ACS data.
  - The AA includes 98,121 families, 21.9 percent are low-, 18.0 percent moderate-, 19.6 percent middle-, and 40.5 percent are upper-income.
  - As of April 1, 2023, the bank operated two branches, representing 0.5 percent of its total branches.
  - As of June 30, 2022, the bank held \$39.8 million in deposits, representing a market share of 0.2 percent and approximately 0.1 percent of Comerica's total deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Appendix D contains detailed performance and demographic information reviewed for the AA. Table 126 discusses conclusions regarding the bank's performance.

**Table 126**

| <b>Assessment Area</b> | <b>Lending Test</b> | <b>Investment Test</b> | <b>Service Test</b> |
|------------------------|---------------------|------------------------|---------------------|
| Naples MSA AA          | Below               | Below                  | Consistent          |

The institution's lending and investment performance in the AA is below Comerica's performance in the state; however, it does not impact the assessed rating.



## **STATE OF ARIZONA**

### **CRA RATING FOR ARIZONA:**

### **Satisfactory**

|                               |                   |
|-------------------------------|-------------------|
| The Lending Test is Rated:    | High Satisfactory |
| The Investment Test is Rated: | High Satisfactory |
| The Service Test is Rated:    | High Satisfactory |

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness and record of serving the credit needs of its AA, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects good penetration throughout the sole AA in the state of Arizona.
- The bank's distribution of loans among individuals of different income levels and businesses of different revenue sizes is good.
- The bank is a leader in making CD loans.
- Comerica makes use of innovative and/or flexible lending practices in serving the AA's needs.
- The bank is occasionally in a leadership position given its significant level of qualified CD investments and donations, particularly those not routinely provided by private investors.
- Comerica makes occasional use of innovative and/or complex investments to support CD initiatives.
- The bank exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AA.
- Comerica provides an adequate level of CD services that do not vary in a way that inconveniences the bank's AA, particularly LMI geographies and/or LMI individuals.

### **SCOPE OF THE EVALUATION**

The scope of the review for the state of Arizona is consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. The review period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

The bank designates the Phoenix Metropolitan AA, as its single AA in the state of Arizona. As such, the Phoenix Metropolitan AA was reviewed using full-scope examination procedures. Accordingly, the statewide rating is based on the CRA performance within this AA and any other investment or services that are provided on a broader, statewide basis.

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA**

Comerica delineates one of its 27 AAs and operates 17 of its 409 total branches in the state of Arizona. As of June 30, 2022, the bank held \$734.7 million in deposits in the state, representing approximately one percent of its total deposits. According to the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Summary of Deposits, the bank had a deposit market share of 0.3 percent and ranked 24<sup>th</sup> out of 67 FDIC-insured financial institutions across the state.

Of the 20,205 HMDA-reportable loans and 35,231 small business loans originated and purchased by Comerica during the review period, 1,050 HMDA-reportable loans (5.2 percent) and 703 small business loans (2.0 percent) were extended in the state of Arizona.

#### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Conclusions with respect to Comerica's performance in the state of Arizona are based upon the bank's performance in the only delineated AA within the state. See the Phoenix Metropolitan AA section below for information on the bank's CRA performance in the state of Arizona.

**PHOENIX METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PHOENIX METROPOLITAN ASSESSMENT AREA**

- The bank's Phoenix Metropolitan AA is comprised of Maricopa County in its entirety, which represents a portion of the Phoenix-Mesa-Chandler, AZ MSA. Refer to Appendix A for an AA map.
- The AA is made up of 1,009 census tracts, of which 6.3 percent are designated as low-income, 25.7 percent are moderate-income, 31.1 percent are middle-income, 34.5 percent are upper-income, and 2.4 percent are designated as unknown-income.
- Since the previous evaluation and the issuance of the 2020 U.S. Census data, 93 new geographies were drawn within Maricopa County and the income level designations of many existing census tracts changed. The number of low-income census tracts in the AA decreased by 39.0 percent but LMI geographies increased by 3.7 percent. Refer to Appendix B for additional demographic data.
- The bank operates 17 full-service branches in the AA, including four branches in moderate-income, five in middle-income, and eight in upper-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 0.4 percent market share, ranking 20<sup>th</sup> out of 61 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 88<sup>th</sup> out of 978 HMDA reporters in the AA with 417 HMDA originations and purchases, and 51<sup>st</sup> out of 239 CRA reporters with 110 CRA small business and small farm loans.
- A community contact shared that the AA has experienced significant population growth due to the influx of people from areas where the cost of living and housing are much higher. The community contact noted that housing availability for LMI individuals and families is limited, resulting in the rise of homelessness throughout the AA.

**Table 127**

| <b>Population Change</b>                                                                                              |                            |                            |                              |
|-----------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|------------------------------|
| <b>Assessment Area: Phoenix Metropolitan</b>                                                                          |                            |                            |                              |
| <b>Area</b>                                                                                                           | <b>2015<br/>Population</b> | <b>2020<br/>Population</b> | <b>Percentage<br/>Change</b> |
| Phoenix Metropolitan AA                                                                                               | 4,018,143                  | 4,420,568                  | 10.0                         |
| Phoenix-Mesa-Chandler, AZ MSA                                                                                         | 4,407,915                  | 4,845,832                  | 9.9                          |
| Arizona                                                                                                               | 6,641,928                  | 7,151,502                  | 7.7                          |
| <i>Source: 2020 U.S. Census Bureau Decennial Census<br/>2011 - 2015 U.S. Census Bureau: American Community Survey</i> |                            |                            |                              |

- The AA's population has grown substantially since 2015, exceeding the growth rate of the Phoenix-Mesa-Chandler, AZ MSA and the state of Arizona as a whole. The AA's suburban population has doubled in size in some areas.
- Phoenix, AZ is one of the fastest growing cities in the United States over the most recent decade, surpassing Philadelphia to be the fifth largest city by population in the country. This increase has been fueled by the migration of families, as a result of job opportunities related to the arrival of technology companies and lower cost of living than in other areas of the nation. A community contact shared that the population growth in the AA is primarily driven by AA's lower cost of living and housing in comparison to other metropolitan areas.

- Several colleges and universities are located in the AA, including Grand Canyon University and Phoenix College, with approximate enrollments of 64,000 and 17,000, respectively.

**Table 128**

| Median Family Income Change<br>Assessment Area: Phoenix Metropolitan                                                                                                                                                          |                           |                           |                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------------------------|-------------------|
| Area                                                                                                                                                                                                                          | 2015 Median Family Income | 2020 Median Family Income | Percentage Change |
| Phoenix Metropolitan AA                                                                                                                                                                                                       | 70,745                    | 80,161                    | 13.3              |
| Phoenix-Mesa-Chandler, AZ MSA                                                                                                                                                                                                 | 69,582                    | 78,930                    | 13.4              |
| Arizona                                                                                                                                                                                                                       | 64,986                    | 73,456                    | 13.0              |
| Source: 2011 - 2015 U.S. Census Bureau: American Community Survey<br>2016 - 2020 U.S. Census Bureau: American Community Survey<br>Note: Median family incomes have been adjusted for inflation and expressed in 2020 dollars. |                           |                           |                   |

- The AA's median family income (MFI) has increased proportionally to the MFIs for the Phoenix-Mesa-Chandler, AZ MSA and the state of Arizona, at approximately 13 percent. The FFIEC estimates the MSA MFI to grow another 12.5 percent between 2020 and 2022.
- According to 2020 FFIEC data, approximately 9.1 percent of AA families live below the poverty level, which is similar to the 10.1 percent statewide figure.

**Table 129**

| Housing Cost Burden<br>Assessment Area: Phoenix Metropolitan                                                                                                                                              |                       |                 |             |                      |                 |            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area                                                                                                                                                                                                      | Cost Burden - Renters |                 |             | Cost Burden - Owners |                 |            |
|                                                                                                                                                                                                           | Low Income            | Moderate Income | All Renters | Low Income           | Moderate Income | All Owners |
| Phoenix Metropolitan AA                                                                                                                                                                                   | 79.9                  | 48.3            | 43.2        | 61.2                 | 36.7            | 20.4       |
| Phoenix-Mesa-Chandler, AZ MSA                                                                                                                                                                             | 79.0                  | 47.6            | 43.0        | 60.2                 | 35.6            | 20.4       |
| Arizona                                                                                                                                                                                                   | 78.6                  | 46.9            | 42.8        | 57.9                 | 34.5            | 20.3       |
| Cost burden is housing cost that equals 30 percent or more of household income.<br>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy |                       |                 |             |                      |                 |            |

- Housing affordability within the AA varies among the income levels, with the burden on low-income renters and owners being substantially greater than the burden on renters and owners at any other income level.
- Overall, the cost burden for homeowners and renters in the AA is comparable to the housing cost burden for homeowners and renters statewide in Arizona.
- The median age of housing stock in the AA is 37 years, and the median housing value is \$278,687. Additionally, the average median gross rent in the AA is \$1,182.
- A community contact noted that affordable housing throughout the AA for LMI individuals and families is limited, resulting in the rise of homelessness.

**Table 130**

| <b>Unemployment Rates</b>                                                     |             |             |             |             |             |
|-------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Assessment Area: Phoenix Metropolitan</b>                                  |             |             |             |             |             |
| <b>Region</b>                                                                 | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| Phoenix Metropolitan AA                                                       | 4.1         | 4.2         | 7.2         | 4.5         | 3.3         |
| Phoenix-Mesa-Chandler, AZ MSA                                                 | 4.2         | 4.2         | 7.2         | 4.5         | 3.4         |
| Arizona                                                                       | 4.8         | 4.9         | 7.7         | 4.9         | 3.8         |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> |             |             |             |             |             |

- Unemployment rates in the AA remained below the overall statewide figure from 2018 to 2022.
- Unemployment rates significantly increased in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2021, the AA unemployment rate stabilized and returned to pre-pandemic levels. In 2022, the AA unemployment rate continued to improve, by 1.2 percent.
- Major employment industries in the AA include health care and social assistance, retail trade, and government. The top employers in the AA include the State of Arizona, City of Phoenix, Wal-Mart Stores, and the Banner Health system.

Table 131 details selected characteristics of the AA.

**Table 131**

| 2022 Combined Demographics                                                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Phoenix Metropolitan                                                                                   |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 64                        | 6.3                   | 52,329                             | 5.0       | 16,580                                             | 31.7      | 213,662                   | 20.4      |
| Moderate                                                                                                                | 259                       | 25.7                  | 249,837                            | 23.8      | 39,265                                             | 15.7      | 187,650                   | 17.9      |
| Middle                                                                                                                  | 314                       | 31.1                  | 346,377                            | 33.1      | 25,076                                             | 7.2       | 209,528                   | 20.0      |
| Upper                                                                                                                   | 348                       | 34.5                  | 396,593                            | 37.8      | 13,719                                             | 3.5       | 437,059                   | 41.7      |
| Unknown                                                                                                                 | 24                        | 2.4                   | 2,763                              | 0.3       | 638                                                | 23.1      | 0                         | 0.0       |
| Total AA                                                                                                                | 1,009                     | 100.0                 | 1,047,899                          | 100.0     | 95,278                                             | 9.1       | 1,047,899                 | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 94,740                    | 26,498                | 2.6                                | 28.0      | 58,759                                             | 62.0      | 9,483                     | 10.0      |
| Moderate                                                                                                                | 467,263                   | 208,235               | 20.6                               | 44.6      | 209,530                                            | 44.8      | 49,498                    | 10.6      |
| Middle                                                                                                                  | 590,915                   | 349,840               | 34.7                               | 59.2      | 186,145                                            | 31.5      | 54,930                    | 9.3       |
| Upper                                                                                                                   | 606,362                   | 422,448               | 41.9                               | 69.7      | 129,770                                            | 21.4      | 54,144                    | 8.9       |
| Unknown                                                                                                                 | 6,600                     | 1,466                 | 0.1                                | 22.2      | 4,093                                              | 62.0      | 1,041                     | 15.8      |
| Total AA                                                                                                                | 1,765,880                 | 1,008,487             | 100.0                              | 57.1      | 588,297                                            | 33.3      | 169,096                   | 9.6       |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 8,868                     | 3.7                   | 7,828                              | 3.5       | 970                                                | 7.3       | 70                        | 2.3       |
| Moderate                                                                                                                | 44,104                    | 18.4                  | 39,928                             | 17.9      | 3,706                                              | 27.8      | 470                       | 15.5      |
| Middle                                                                                                                  | 70,047                    | 29.2                  | 65,965                             | 29.5      | 3,398                                              | 25.5      | 684                       | 22.5      |
| Upper                                                                                                                   | 115,178                   | 48.0                  | 108,397                            | 48.5      | 4,980                                              | 37.3      | 1,801                     | 59.3      |
| Unknown                                                                                                                 | 1,817                     | 0.8                   | 1,515                              | 0.7       | 288                                                | 2.2       | 14                        | 0.5       |
| Total AA                                                                                                                | 240,014                   | 100.0                 | 223,633                            | 100.0     | 13,342                                             | 100.0     | 3,039                     | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 93.2      |                                                    | 5.6       |                           | 1.3       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 31                        | 1.8                   | 28                                 | 1.7       | 3                                                  | 3.9       | 0                         | 0.0       |
| Moderate                                                                                                                | 214                       | 12.2                  | 197                                | 11.7      | 17                                                 | 22.1      | 0                         | 0.0       |
| Middle                                                                                                                  | 516                       | 29.3                  | 493                                | 29.3      | 23                                                 | 29.9      | 0                         | 0.0       |
| Upper                                                                                                                   | 990                       | 56.3                  | 956                                | 56.8      | 34                                                 | 44.2      | 0                         | 0.0       |
| Unknown                                                                                                                 | 8                         | 0.5                   | 8                                  | 0.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 1,759                     | 100.0                 | 1,682                              | 100.0     | 77                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 95.6      |                                                    | 4.4       |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS****LENDING TEST**

The bank's lending test performance in the Phoenix Metropolitan AA is good. For this evaluation, the bank's home mortgage lending was generally given greater weight as these products represent the largest volume of lending in the AA during the review period. Additionally, multifamily, other purpose closed/exempt, and loan purpose not applicable lending products were not evaluated separately from the evaluation of the bank's home mortgage lending.

Details of the bank's 2020 mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix C.

***Lending Activity***

The bank's lending activity in the Phoenix Metropolitan AA reflects good responsiveness and use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 535 SBA loans and 160 small business micro loans within the AA.

Comerica originated 1,050 home mortgage and 703 small business loans between January 1, 2020, and December 31, 2022. The volume of small business and home mortgage lending decreased primarily due to the increase in interest rates and the cessation of the SBA's PPP in May 2021. However, loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

**Table 132**

| <b>Summary of Lending Activity – January 1, 2020 through December 31, 2022</b> |              |              |                |              |
|--------------------------------------------------------------------------------|--------------|--------------|----------------|--------------|
| <b>Assessment Area: Phoenix Metropolitan</b>                                   |              |              |                |              |
| <b>Loan Type</b>                                                               | <b>#</b>     | <b>%</b>     | <b>\$000s</b>  | <b>%</b>     |
| Home Purchase                                                                  | 94           | 5.3          | 29,364         | 7.5          |
| Refinancing                                                                    | 252          | 14.3         | 76,439         | 19.5         |
| Home Improvement                                                               | 435          | 24.6         | 59,597         | 15.2         |
| Multifamily                                                                    | 4            | 0.2          | 72,200         | 18.5         |
| Other Purpose Lines of Credit                                                  | 254          | 14.4         | 35,632         | 9.1          |
| Other Purpose Closed/Exempt                                                    | 11           | 0.6          | 8,579          | 2.2          |
| <b>Total HMDA-Related</b>                                                      | <b>1,050</b> | <b>59.5</b>  | <b>281,811</b> | <b>72.0</b>  |
| <b>Total Small Business</b>                                                    | <b>703</b>   | <b>39.8</b>  | <b>109,160</b> | <b>27.9</b>  |
| <b>Total Small Farm</b>                                                        | <b>12</b>    | <b>0.7</b>   | <b>270</b>     | <b>0.1</b>   |
| <b>TOTAL LOANS</b>                                                             | <b>1,765</b> | <b>100.0</b> | <b>391,241</b> | <b>100.0</b> |

***Geographic Distribution of Loans***

The geographic distribution of lending reflects excellent penetration throughout the AA. The bank's small business and home mortgage lending reflects excellent and good penetration among geographies of different income levels, respectively. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about Comerica's performance

in LMI census tracts. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

*Residential Real Estate (HMDA) Lending*

The geographic distribution of home mortgage loans is good. The distribution of 2021 and 2022 home mortgage loans among low-income census tracts is comparable to aggregate data, though below the percentage of owner-occupied units in these tracts (the demographic figure). The penetration of the bank's HMDA lending in moderate-income census tracts is below aggregate data in 2022, though above aggregate data in 2021 by a similar margin. In both years, the bank's lending in moderate-income census tracts was below the demographic figure.

The bank's lending performance for 2020 reflected penetration levels similar than those of 2021 and 2022, with a distribution of loans to LMI tracts that was comparable to aggregate data but below the demographic figure.

*Home Purchase Lending*

The geographic distribution of home purchase lending is excellent. The distribution of 2021 and 2022 home purchase loans among low-income census tracts is significantly above the aggregate data. During both years, the bank's level of lending in low-income census tracts was more than twice that of aggregate lenders and the percentage of owner-occupied units in these tracts.

The distribution of the bank's home purchase loans among moderate-income census tracts is also substantially above both aggregate lending performance and the demographic figure. During the review period, almost half of home purchase loans originated by the bank in the Phoenix Metropolitan AA were in moderate-income census tracts, which contain less than 21 percent of owner-occupied units.

*Home Refinance Lending*

The geographic distribution of home refinance lending is excellent. The distribution of 2022 home refinance loans among low-income census tracts are comparable to aggregate data and the demographic figure. The bank's lending in moderate-income census tracts is above that of aggregate lenders and comparable to the demographic figure.

The bank's lending performance for 2021 reflected penetration levels that were above that of 2022. Distribution of 2021 home refinance loans among LMI census tracts in the Phoenix Metropolitan AA was significantly above aggregate lending performance and the demographic figure.

*Home Improvement Lending*

The geographic distribution of home improvement lending is adequate. The distribution of 2021 and 2022 home improvement loans among low-income census tracts is comparable to aggregate data and the demographic figure. Conversely, the bank's home improvement lending in moderate-income census tracts is below aggregate data and the demographic figure.



*Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is adequate. The bank did not originate any other purpose lines of credit among low-income census tracts in 2021 or 2022, though this represents a level of performance that is comparable to aggregate data in each year. Among moderate-income census tracts, the bank's performance is comparable to aggregate data and below the percentage of owner-occupied units in these tracts, which could point to lack of loan demand.

Table 133A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Phoenix Metropolitan                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 6                                | 18.8  | 5.3   | 1,172   | 10.2  | 3.3   | 2    | 6.7   | 2.5   | 815     | 10.4  | 1.7   | 2.6                          |
| Moderate                                                                                                                                                    | 17                               | 53.1  | 17.1  | 4,035   | 35.2  | 12.0  | 13   | 43.3  | 18.9  | 3,643   | 46.7  | 13.3  | 20.6                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 36.0  | 0       | 0.0   | 31.0  | 6    | 20.0  | 36.2  | 814     | 10.4  | 31.0  | 34.7                         |
| Upper                                                                                                                                                       | 9                                | 28.1  | 41.0  | 6,272   | 54.6  | 53.0  | 9    | 30.0  | 42.2  | 2,529   | 32.4  | 54.0  | 41.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                                                       | 32                               | 100.0 | 100.0 | 11,479  | 100.0 | 100.0 | 30   | 100.0 | 100.0 | 7,801   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 4                                | 4.2   | 2.8   | 695     | 3.3   | 1.8   | 1    | 1.3   | 2.1   | 245     | 0.7   | 1.4   | 2.6                          |
| Moderate                                                                                                                                                    | 30                               | 31.3  | 13.3  | 4,565   | 21.9  | 9.5   | 17   | 22.7  | 19.2  | 3,616   | 10.5  | 13.7  | 20.6                         |
| Middle                                                                                                                                                      | 21                               | 21.9  | 34.7  | 4,761   | 22.8  | 29.5  | 24   | 32.0  | 37.1  | 3,722   | 10.8  | 31.6  | 34.7                         |
| Upper                                                                                                                                                       | 39                               | 40.6  | 48.7  | 10,476  | 50.2  | 58.6  | 31   | 41.3  | 41.5  | 26,656  | 77.2  | 53.2  | 41.9                         |
| Unknown                                                                                                                                                     | 2                                | 2.1   | 0.5   | 384     | 1.8   | 0.6   | 2    | 2.7   | 0.1   | 303     | 0.9   | 0.1   | 0.1                          |
| Total                                                                                                                                                       | 96                               | 100.0 | 100.0 | 20,881  | 100.0 | 100.0 | 75   | 100.0 | 100.0 | 34,542  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 4                                | 2.9   | 2.1   | 491     | 2.9   | 1.7   | 0    | 0.0   | 1.4   | 0       | 0.0   | 1.0   | 2.6                          |
| Moderate                                                                                                                                                    | 9                                | 6.6   | 10.5  | 716     | 4.2   | 8.3   | 14   | 6.5   | 12.0  | 1,263   | 4.0   | 8.7   | 20.6                         |
| Middle                                                                                                                                                      | 34                               | 24.8  | 31.6  | 2,987   | 17.5  | 26.3  | 59   | 27.6  | 31.4  | 6,157   | 19.7  | 25.4  | 34.7                         |
| Upper                                                                                                                                                       | 90                               | 65.7  | 55.1  | 12,867  | 75.4  | 63.1  | 140  | 65.4  | 55.1  | 23,847  | 76.2  | 64.9  | 41.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.6   | 1    | 0.5   | 0.0   | 12      | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 137                              | 100.0 | 100.0 | 17,061  | 100.0 | 100.0 | 214  | 100.0 | 100.0 | 31,279  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                                         | 0                                | 0.0   | 27.1  | 0       | 0.0   | 14.8  | 0    | 0.0   | 14.8  | 0       | 0.0   | 16.4  | 10.0                         |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 39.8  | 0       | 0.0   | 32.4  | 0    | 0.0   | 41.9  | 0       | 0.0   | 33.1  | 35.9                         |
| Middle                                                                                                                                                      | 1                                | 50.0  | 18.3  | 19,750  | 59.8  | 25.1  | 0    | 0.0   | 27.1  | 0       | 0.0   | 28.2  | 29.9                         |
| Upper                                                                                                                                                       | 1                                | 50.0  | 13.8  | 13,300  | 40.2  | 26.6  | 1    | 100.0 | 16.0  | 12,250  | 100.0 | 21.8  | 23.3                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 1.0   | 0       | 0.0   | 1.2   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.6   | 0.9                          |
| Total                                                                                                                                                       | 2                                | 100.0 | 100.0 | 33,050  | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 12,250  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                                         | 14                               | 3.9   | 3.6   | 2,358   | 2.3   | 2.9   | 3    | 0.7   | 2.2   | 1,060   | 1.1   | 3.0   | 2.6                          |
| Moderate                                                                                                                                                    | 66                               | 18.4  | 14.4  | 10,105  | 9.9   | 11.3  | 55   | 13.2  | 18.1  | 9,834   | 9.8   | 15.1  | 20.6                         |
| Middle                                                                                                                                                      | 80                               | 22.3  | 34.9  | 30,294  | 29.8  | 29.7  | 120  | 28.8  | 35.8  | 14,139  | 14.1  | 30.4  | 34.7                         |
| Upper                                                                                                                                                       | 196                              | 54.6  | 46.5  | 58,428  | 57.5  | 55.5  | 236  | 56.6  | 43.8  | 74,930  | 74.7  | 51.4  | 41.9                         |
| Unknown                                                                                                                                                     | 3                                | 0.8   | 0.5   | 417     | 0.4   | 0.7   | 3    | 0.7   | 0.1   | 315     | 0.3   | 0.1   | 0.1                          |
| Total                                                                                                                                                       | 359                              | 100.0 | 100.0 | 101,602 | 100.0 | 100.0 | 417  | 100.0 | 100.0 | 100,278 | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

**Table 133B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Phoenix Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|---------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                       | 0                                | 0.0   | 1.3   | 0       | 0.0   | 0.7   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.5   | 2.6                          |
| Moderate                                                                                                                  | 10                               | 11.2  | 8.9   | 789     | 6.3   | 5.5   | 8    | 8.9   | 10.9  | 805     | 6.0   | 6.6   | 20.6                         |
| Middle                                                                                                                    | 24                               | 27.0  | 30.4  | 2,796   | 22.2  | 23.0  | 30   | 33.3  | 29.0  | 3,296   | 24.5  | 19.6  | 34.7                         |
| Upper                                                                                                                     | 54                               | 60.7  | 58.8  | 8,961   | 71.2  | 70.5  | 52   | 57.8  | 59.1  | 9,378   | 69.6  | 73.2  | 41.9                         |
| Unknown                                                                                                                   | 1                                | 1.1   | 0.6   | 33      | 0.3   | 0.3   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                     | 89                               | 100.0 | 100.0 | 12,579  | 100.0 | 100.0 | 90   | 100.0 | 100.0 | 13,479  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                       | 0                                | 0.0   | 2.4   | 0       | 0.0   | 1.0   | 0    | 0.0   | 1.4   | 0       | 0.0   | 0.5   | 2.6                          |
| Moderate                                                                                                                  | 0                                | 0.0   | 11.7  | 0       | 0.0   | 5.8   | 3    | 42.9  | 13.6  | 507     | 54.7  | 6.2   | 20.6                         |
| Middle                                                                                                                    | 0                                | 0.0   | 30.1  | 0       | 0.0   | 15.5  | 1    | 14.3  | 31.2  | 150     | 16.2  | 15.7  | 34.7                         |
| Upper                                                                                                                     | 3                                | 100.0 | 55.2  | 6,552   | 100.0 | 77.4  | 3    | 42.9  | 53.7  | 270     | 29.1  | 77.7  | 41.9                         |
| Unknown                                                                                                                   | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                     | 3                                | 100.0 | 100.0 | 6,552   | 100.0 | 100.0 | 7    | 100.0 | 100.0 | 927     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                       | 0                                | 0.0   | 7.5   | 0       | 0.0   | 4.9   | 0    | 0.0   | 2.7   | 0       | 0.0   | 1.0   | 2.6                          |
| Moderate                                                                                                                  | 0                                | 0.0   | 22.7  | 0       | 0.0   | 17.5  | 0    | 0.0   | 26.4  | 0       | 0.0   | 24.4  | 20.6                         |
| Middle                                                                                                                    | 0                                | 0.0   | 42.7  | 0       | 0.0   | 37.9  | 0    | 0.0   | 46.4  | 0       | 0.0   | 33.4  | 34.7                         |
| Upper                                                                                                                     | 0                                | 0.0   | 26.9  | 0       | 0.0   | 39.3  | 0    | 0.0   | 24.5  | 0       | 0.0   | 41.2  | 41.9                         |
| Unknown                                                                                                                   | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                     | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. The distribution of 2021 and 2022 small business loans among low-income census tracts is greater than aggregate data as well as the percentage of businesses in these tracts (the demographic figure). The bank's small business lending in moderate-income census tracts is also above aggregate lending, outpacing aggregate data by almost 10 percent in 2022. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the Phoenix Metropolitan AA.

Although the volume of small business lending has decreased, Comerica's performance in 2020 is consistent with the bank's performance in 2021 and 2022. The decrease is attributed to the conclusion of the SBA's PPP lending and the increase in interest rates.

Table 134

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Phoenix Metropolitan                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 20                               | 10.2  | 6.5   | 5,069   | 18.1  | 9.3   | 8    | 7.3   | 3.6   | 2,088   | 7.0   | 5.1   | 3.7                      |
| Moderate                                                                                                                                                                                  | 48                               | 24.5  | 16.1  | 6,898   | 24.6  | 18.8  | 29   | 26.6  | 17.8  | 6,418   | 21.4  | 21.3  | 18.4                     |
| Middle                                                                                                                                                                                    | 58                               | 29.6  | 27.5  | 6,664   | 23.8  | 25.9  | 35   | 32.1  | 28.5  | 9,552   | 31.8  | 26.5  | 29.2                     |
| Upper                                                                                                                                                                                     | 69                               | 35.2  | 48.6  | 9,231   | 32.9  | 44.7  | 35   | 32.1  | 49.1  | 11,626  | 38.7  | 45.7  | 48.0                     |
| Unknown                                                                                                                                                                                   | 1                                | 0.5   | 0.6   | 160     | 0.6   | 1.1   | 2    | 1.8   | 0.7   | 350     | 1.2   | 1.3   | 0.8                      |
| Total                                                                                                                                                                                     | 196                              | 100.0 | 100.0 | 28,022  | 100.0 | 100.0 | 109  | 100.0 | 100.0 | 30,034  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's borrower distribution of lending reflects a good penetration among individuals of different income levels (including LMI) and businesses of revenue different sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### Residential Real Estate (HMDA) Lending

Home mortgage lending by borrower income in the Phoenix Metropolitan AA is good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders. In 2021, the bank's lending to LMI borrowers was comparable to the performance of aggregate HMDA lenders. Lending to low-income borrowers was also comparable to aggregate performance in 2022, though the bank's performance to moderate-income borrowers decreased.

The shift in performance toward higher income borrowers occurred as interest rates began to rise from historic lows in early 2022, making mortgage loans more expensive and pricing some lower-income borrowers out of the market. However, the bank's lending to low-income borrowers for home refinance loans and other purpose lines of credit was noteworthy as Comerica lent these products at levels well above aggregate HMDA lenders.

The bank's lending performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is comparable to aggregate data but below the demographic figure.

**Table 135A**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Phoenix Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                       | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                       | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                       | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 0                                | 0.0   | 3.2   | 0       | 0.0   | 1.6   | 1    | 3.3   | 3.3   | 58      | 0.7   | 1.4   | 20.4                              |
| Moderate                                                                                                              | 16                               | 50.0  | 15.1  | 3,654   | 31.8  | 10.4  | 3    | 10.0  | 12.9  | 476     | 6.1   | 8.4   | 17.9                              |
| Middle                                                                                                                | 8                                | 25.0  | 19.5  | 1,623   | 14.1  | 16.6  | 7    | 23.3  | 20.4  | 2,144   | 27.5  | 17.0  | 20.0                              |
| Upper                                                                                                                 | 8                                | 25.0  | 41.5  | 6,202   | 54.0  | 52.6  | 19   | 63.3  | 43.4  | 5,123   | 65.7  | 53.4  | 41.7                              |
| Unknown                                                                                                               | 0                                | 0.0   | 20.7  | 0       | 0.0   | 18.8  | 0    | 0.0   | 19.9  | 0       | 0.0   | 19.7  | 0.0                               |
| Total                                                                                                                 | 32                               | 100.0 | 100.0 | 11,479  | 100.0 | 100.0 | 30   | 100.0 | 100.0 | 7,801   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 8                                | 8.3   | 6.2   | 810     | 3.9   | 3.6   | 16   | 21.3  | 11.1  | 2,173   | 6.3   | 6.7   | 20.4                              |
| Moderate                                                                                                              | 19                               | 19.8  | 16.6  | 3,067   | 14.7  | 11.9  | 13   | 17.3  | 20.7  | 2,518   | 7.3   | 15.5  | 17.9                              |
| Middle                                                                                                                | 18                               | 18.8  | 20.3  | 3,039   | 14.6  | 17.9  | 9    | 12.0  | 21.2  | 1,868   | 5.4   | 19.4  | 20.0                              |
| Upper                                                                                                                 | 49                               | 51.0  | 37.9  | 12,466  | 59.7  | 47.2  | 33   | 44.0  | 32.0  | 7,693   | 22.3  | 41.6  | 41.7                              |
| Unknown                                                                                                               | 2                                | 2.1   | 19.0  | 1,499   | 7.2   | 19.3  | 4    | 5.3   | 15.1  | 20,290  | 58.7  | 16.8  | 0.0                               |
| Total                                                                                                                 | 96                               | 100.0 | 100.0 | 20,881  | 100.0 | 100.0 | 75   | 100.0 | 100.0 | 34,542  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 4                                | 2.9   | 4.1   | 259     | 1.5   | 2.9   | 2    | 0.9   | 10.1  | 176     | 0.6   | 7.3   | 20.4                              |
| Moderate                                                                                                              | 16                               | 11.7  | 12.1  | 1,477   | 8.7   | 9.3   | 13   | 6.1   | 12.3  | 867     | 2.8   | 8.5   | 17.9                              |
| Middle                                                                                                                | 24                               | 17.5  | 20.0  | 1,613   | 9.5   | 16.9  | 51   | 23.8  | 20.6  | 4,990   | 16.0  | 15.9  | 20.0                              |
| Upper                                                                                                                 | 92                               | 67.2  | 60.2  | 13,697  | 80.3  | 65.0  | 142  | 66.4  | 53.0  | 24,111  | 77.1  | 63.7  | 41.7                              |
| Unknown                                                                                                               | 1                                | 0.7   | 3.6   | 15      | 0.1   | 6.0   | 6    | 2.8   | 4.0   | 1,135   | 3.6   | 4.6   | 0.0                               |
| Total                                                                                                                 | 137                              | 100.0 | 100.0 | 17,061  | 100.0 | 100.0 | 214  | 100.0 | 100.0 | 31,279  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 16                               | 4.5   | 5.1   | 1,219   | 1.8   | 2.8   | 25   | 6.0   | 6.8   | 2,910   | 3.3   | 3.4   | 20.4                              |
| Moderate                                                                                                              | 61                               | 17.1  | 15.8  | 9,054   | 13.2  | 11.2  | 39   | 9.4   | 15.6  | 4,570   | 5.2   | 10.7  | 17.9                              |
| Middle                                                                                                                | 64                               | 17.9  | 20.0  | 7,532   | 11.0  | 17.3  | 81   | 19.5  | 20.6  | 9,997   | 11.4  | 17.5  | 20.0                              |
| Upper                                                                                                                 | 213                              | 59.7  | 40.1  | 49,233  | 71.8  | 49.7  | 260  | 62.5  | 40.5  | 49,076  | 55.8  | 50.2  | 41.7                              |
| Unknown                                                                                                               | 3                                | 0.8   | 19.0  | 1,514   | 2.2   | 19.0  | 11   | 2.6   | 16.5  | 21,475  | 24.4  | 18.2  | 0.0                               |
| Total                                                                                                                 | 357                              | 100.0 | 100.0 | 68,552  | 100.0 | 100.0 | 416  | 100.0 | 100.0 | 88,028  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table 135B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Phoenix Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                       | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                       | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                       | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 4                                | 4.5   | 4.0   | 150     | 1.2   | 3.3   | 5    | 5.6   | 4.0   | 407     | 3.0   | 3.0   | 20.4                              |
| Moderate                                                                                                              | 10                               | 11.2  | 9.8   | 856     | 6.8   | 5.7   | 6    | 6.7   | 10.9  | 298     | 2.2   | 5.5   | 17.9                              |
| Middle                                                                                                                | 14                               | 15.7  | 18.4  | 1,257   | 10.0  | 11.4  | 14   | 15.6  | 19.3  | 995     | 7.4   | 12.0  | 20.0                              |
| Upper                                                                                                                 | 61                               | 68.5  | 61.8  | 10,316  | 82.0  | 72.3  | 64   | 71.1  | 53.8  | 11,729  | 87.0  | 66.7  | 41.7                              |
| Unknown                                                                                                               | 0                                | 0.0   | 6.0   | 0       | 0.0   | 7.4   | 1    | 1.1   | 12.0  | 50      | 0.4   | 12.8  | 0.0                               |
| Total                                                                                                                 | 89                               | 100.0 | 100.0 | 12,579  | 100.0 | 100.0 | 90   | 100.0 | 100.0 | 13,479  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 0                                | 0.0   | 7.2   | 0       | 0.0   | 3.5   | 1    | 14.3  | 6.4   | 96      | 10.4  | 4.6   | 20.4                              |
| Moderate                                                                                                              | 0                                | 0.0   | 11.1  | 0       | 0.0   | 5.2   | 4    | 57.1  | 13.3  | 411     | 44.3  | 5.8   | 17.9                              |
| Middle                                                                                                                | 0                                | 0.0   | 17.2  | 0       | 0.0   | 7.7   | 0    | 0.0   | 20.1  | 0       | 0.0   | 8.5   | 20.0                              |
| Upper                                                                                                                 | 3                                | 100.0 | 55.3  | 6,552   | 100.0 | 70.3  | 2    | 28.6  | 49.8  | 420     | 45.3  | 65.9  | 41.7                              |
| Unknown                                                                                                               | 0                                | 0.0   | 9.2   | 0       | 0.0   | 13.3  | 0    | 0.0   | 10.3  | 0       | 0.0   | 15.2  | 0.0                               |
| Total                                                                                                                 | 3                                | 100.0 | 100.0 | 6,552   | 100.0 | 100.0 | 7    | 100.0 | 100.0 | 927     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                   | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.3   | 20.4                              |
| Moderate                                                                                                              | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 17.9                              |
| Middle                                                                                                                | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.8   | 20.0                              |
| Upper                                                                                                                 | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 41.7                              |
| Unknown                                                                                                               | 0                                | 0.0   | 98.1  | 0       | 0.0   | 98.5  | 0    | 0.0   | 97.7  | 0       | 0.0   | 98.2  | 0.0                               |
| Total                                                                                                                 | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

### Small Business Lending

Comerica's lending distribution to businesses of different revenue size is adequate. The distribution of 2022 loan originations to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA and aggregate data by number of originations. Though the bank made a smaller percentage of loans to businesses with revenues of \$1 million or less than aggregate lenders by number volume, these loans represented a larger portion of the total dollar amount of the bank's total loans to small businesses than the comparable aggregate total loans, which reflects favorably on Comerica's willingness to lend larger sums to small businesses. In addition, Comerica's performance in comparison to aggregate lenders carried more weight as aggregate lending is a better indicator of loan demand than the percentage of small businesses in the AA.

In 2021, the bank's performance remained well below the large percentage of AA business reporting annual revenues of \$1 million or less, though the bank originated a larger percentage of small business loans to businesses with annual revenues of \$1 million or less than reflected by aggregate lending data. Conversely, Comerica's 2020 lending performance to businesses with

annual revenues of \$1 million or less significantly exceeded the volume of lending in 2021 and 2022 and outperformed aggregate lenders' performance.

**Table 136**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Phoenix Metropolitan                                                                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                                                                                       | 110                              | 56.1  | 48.0  | 9,869   | 35.2  | 24.8  | 41   | 37.6  | 54.2  | 10,085  | 33.6  | 31.5  | 93.2                     |
| Over \$1 Million                                                                                                                                                                          | 47                               | 24.0  |       | 14,164  | 50.5  |       | 59   | 54.1  |       | 18,009  | 60.0  |       | 5.6                      |
| Revenue Unknown                                                                                                                                                                           | 39                               | 19.9  |       | 3,989   | 14.2  |       | 9    | 8.3   |       | 1,940   | 6.5   |       | 1.3                      |
| Total                                                                                                                                                                                     | 196                              | 100.0 |       | 28,022  | 100.0 |       | 109  | 100.0 |       | 30,034  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 125                              | 63.8  | 93.5  | 4,389   | 15.7  | 38.7  | 45   | 41.3  | 95.5  | 2,794   | 9.3   | 45.4  |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 39                               | 19.9  | 3.5   | 6,606   | 23.6  | 16.3  | 26   | 23.9  | 2.4   | 5,009   | 16.7  | 13.8  |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 32                               | 16.3  | 3.0   | 17,027  | 60.8  | 45.0  | 38   | 34.9  | 2.1   | 22,231  | 74.0  | 40.8  |                          |
| Total                                                                                                                                                                                     | 196                              | 100.0 | 100.0 | 28,022  | 100.0 | 100.0 | 109  | 100.0 | 100.0 | 30,034  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 87                               | 79.1  |       | 2,974   | 30.1  |       | 23   | 56.1  |       | 1,281   | 12.7  |       |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 16                               | 14.5  |       | 2,461   | 24.9  |       | 6    | 14.6  |       | 1,203   | 11.9  |       |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 7                                | 6.4   |       | 4,434   | 44.9  |       | 12   | 29.3  |       | 7,601   | 75.4  |       |                          |
| Total                                                                                                                                                                                     | 110                              | 100.0 |       | 9,869   | 100.0 |       | 41   | 100.0 |       | 10,085  | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

### Community Development Lending

The bank is a leader in making CD loans in the Phoenix Metropolitan AA. Comerica originated 33 CD loans totaling \$171.9 million in the AA, which comprised 2.4 percent of bank-wide CD loans volume by number and 3.2 percent by dollar amount. Despite the substantial decrease in loans originated through the SBA's PPP, the number of CD loan originations in the AA increased by 83.3 percent since the previous evaluation, representing a substantial increase in the dollar amount of CD loans in the AA (697.4 percent). This is reflective of the bank's focus on identifying CD opportunities and responding through qualified activities.

The largest portion of the bank's CD lending in the AA was comprised of loans that promote economic development by financing small businesses and supporting permanent job creation, retention, or improvement for LMI persons or in LMI geographies. Examples of the bank's CD lending activities that were considered responsive to AA credit needs include:

- A \$7 million loan to a mid-sized bakery and an \$8.5 million loan to a local lighting manufacturer. Combined these loans provided for the retention and improvement of more than 350 LMI jobs.

- Four loans totaling \$15 million to a 24-hour urgent care center that provides behavioral health services to patients experiencing mental health crises and primarily serves local residents receiving Medicaid, which serves as a proxy for determining LMI status.
- A \$100,000 line of credit to a non-profit that provides food, shelter, basic education, and counseling needs to LMI residents of the AA.
- Four SBA PPP loans totaling \$786,000 in response to the ongoing effects of the COVID-19 pandemic, which impacted the nation during the early portion of the review period for this evaluation.

Table 137 details Comerica's CD lending activity during the review period.

**Table 137**

| <b>Community Development Lending<br/>Assessment Area: Phoenix Metropolitan</b> |           |                |
|--------------------------------------------------------------------------------|-----------|----------------|
| <b>Purpose</b>                                                                 | <b>#</b>  | <b>\$000s</b>  |
| Affordable Housing                                                             | 0         | 0              |
| Community Services                                                             | 6         | 15,200         |
| Economic Development                                                           | 23        | 155,906        |
| Revitalization and Stabilization                                               | 4         | 786            |
| <b>Total</b>                                                                   | <b>33</b> | <b>171,892</b> |

## INVESTMENT TEST

The bank's performance under the Investment Test in the Phoenix Metropolitan AA is good. Although Comerica's overall dollar amount of CD investments and donations decreased since the previous evaluation, its volume is significant and occasionally positions the bank as a leader. The slight decrease in dollar amount of CD investments in the AA is attributed to the bank focusing on investments in the states in which the bank has majority of its branches, receives deposits, and originates loans. Comerica makes occasional use of innovative and/or complex investments, particularly those not routinely provided by private investors, and exhibits good responsiveness to credit and CD needs of the AA.

Table 138 illustrates the breakdown of Comerica's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. Examples of CD investment and donation activities include:

- A \$500,000 equity investment in a minority-led community development financial institution (CDFI), providing financing to small business owners and their underserved communities.
- A \$2.3 million LIHTC investment in a new construction project that consists of 43 townhomes reserved for households with incomes below 60 percent of area median income. This project will include a rent-to-own component allowing tenants to accumulate value over time toward the purchase of their unit, catalyzing wealth creation through homeownership.
- An annual donation, totaling \$73,000 over the review period, to support a CDFI serving LMI minority communities in the Southwest United States, including the bank's AA.



**Table 138**

| Investment, Grants, and Donations<br>Assessment Area: Phoenix Metropolitan |                                       |               |                                  |              |           |            |           |               |
|----------------------------------------------------------------------------|---------------------------------------|---------------|----------------------------------|--------------|-----------|------------|-----------|---------------|
| Community Development Purpose                                              | Prior Period Investments <sup>1</sup> |               | Current Investments <sup>2</sup> |              | Donations |            | Total     |               |
|                                                                            | #                                     | \$(000s)      | #                                | \$(000s)     | #         | \$(000s)   | #         | \$(000s)      |
| Affordable Housing                                                         | 9                                     | 13,899        | 2                                | 6,000        | 1         | 10         | 12        | 19,909        |
| Community Services                                                         | 0                                     | 0             | 0                                | 0            | 22        | 163        | 22        | 163           |
| Economic Development                                                       | 0                                     | 0             | 1                                | 500          | 8         | 137        | 9         | 637           |
| Revitalization and Stabilization                                           | 0                                     | 0             | 0                                | 0            | 0         | 0          | 0         | 0             |
| <b>Total</b>                                                               | <b>9</b>                              | <b>13,899</b> | <b>3</b>                         | <b>6,500</b> | <b>31</b> | <b>310</b> | <b>43</b> | <b>20,709</b> |
| <sup>1</sup> Book value of investment                                      |                                       |               |                                  |              |           |            |           |               |
| <sup>2</sup> Original market value of investment                           |                                       |               |                                  |              |           |            |           |               |

## SERVICE TEST

The bank's Service Test performance is good.

### Retail Services

Comerica's delivery systems are accessible to the geographies and individuals of different income levels in the AA. The distribution of the bank's 17 branch offices and 21 ATMs as of April 1, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 139 summarizes the bank's retail locations in the Phoenix Metropolitan AA.

**Table 139**

| Branch and Full-Service ATM Locations<br>Assessment Area: Phoenix Metropolitan |                  |                 |                 |           |              |                   |              |
|--------------------------------------------------------------------------------|------------------|-----------------|-----------------|-----------|--------------|-------------------|--------------|
| Tract Income                                                                   | % of Geographies | % of Households | % of Businesses | Branches  |              | Full-Service ATMs |              |
|                                                                                |                  |                 |                 | #         | %            | #                 | %            |
| Low                                                                            | 6.3              | 5.3             | 3.7             | 0         | 0.0          | 0                 | 0.0          |
| Moderate                                                                       | 25.7             | 26.2            | 18.4            | 4         | 23.5         | 4                 | 19.0         |
| Middle                                                                         | 31.1             | 33.6            | 29.2            | 5         | 29.4         | 8                 | 38.1         |
| Upper                                                                          | 34.5             | 34.6            | 48.0            | 8         | 47.1         | 9                 | 42.9         |
| Unknown                                                                        | 2.4              | 0.3             | 0.8             | 0         | 0.0          | 0                 | 0.0          |
| <b>Total</b>                                                                   | <b>100.0</b>     | <b>100.0</b>    | <b>100.0</b>    | <b>17</b> | <b>100.0</b> | <b>21</b>         | <b>100.0</b> |

The bank's branch offices in the AA are generally well distributed, with the exception of the city of Glendale, AZ, which contains no Comerica branches. Glendale contains approximately 8 percent of the total LMI census tracts in the AA and stands out as a corridor for which Comerica branches are not readily available. However, the 65 square miles that make up the city are well saturated with 47 branches from other financial institutions. Additionally, Comerica's branch locations are within five miles of Glendale's LMI census tracts and more than 90 percent of the 323 LMI geographies within the entire AA.

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations are materially the same and do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.

*Community Development Services*

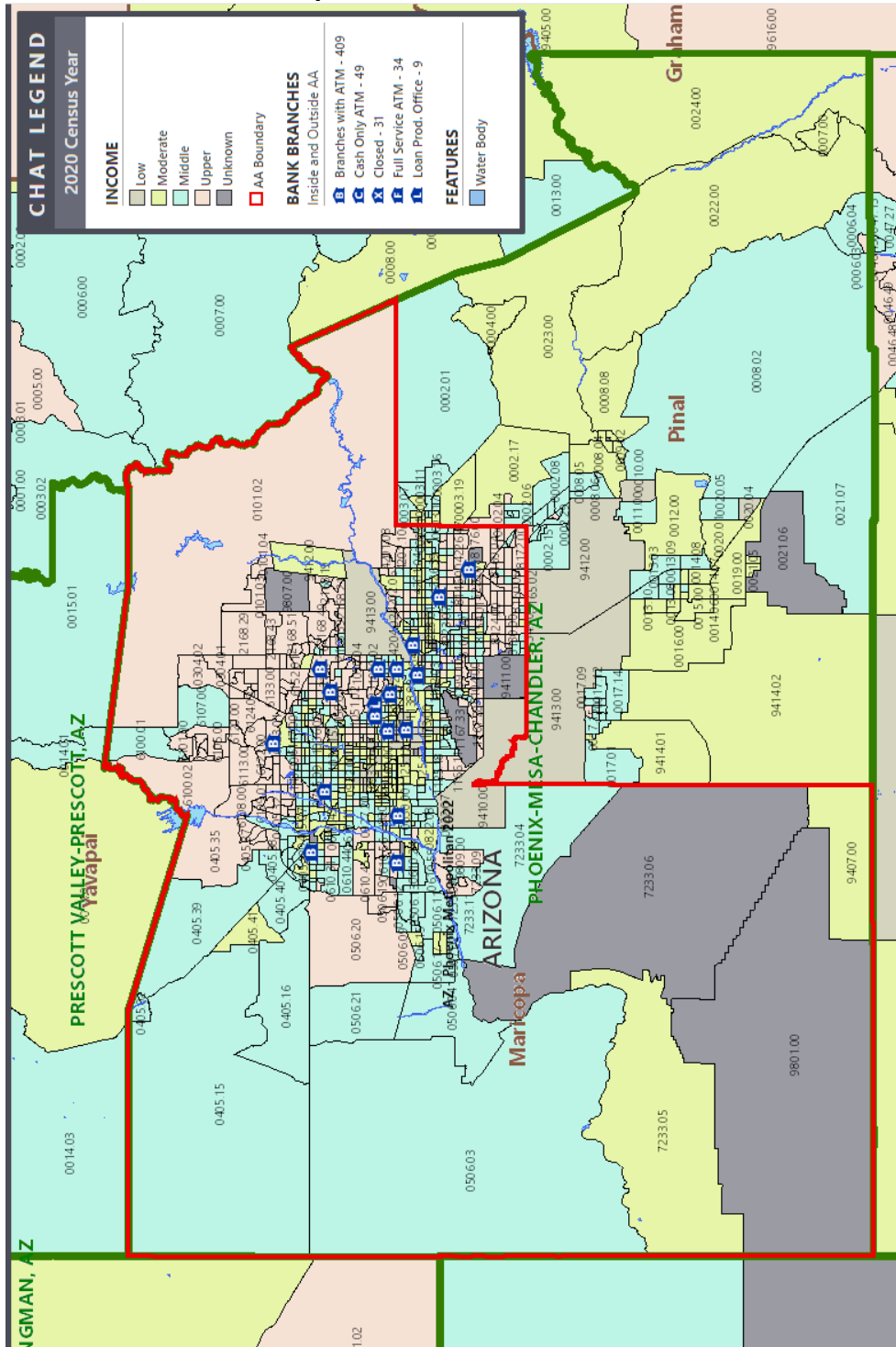
The bank provides an adequate level of CD services in the Phoenix Metropolitan AA. Comerica's employees served in various capacities, including boards of directors and as trustees, for 14 organizations offering CD services targeted toward LMI individuals. The 72 CD services provided by bank representatives during the review period total approximately 414 hours. Examples of services performed by bank employees include:

- Twenty-three bank representatives volunteer with a local organization to teach financial education at local schools where the majority of students qualify for free or reduced-price lunch. One bank employee also sits on the organization's board of directors.
- One bank representative serves as a director of a local organization that offers legal and financial services to minority-owned businesses, of which the substantial majority of owners are LMI individuals.

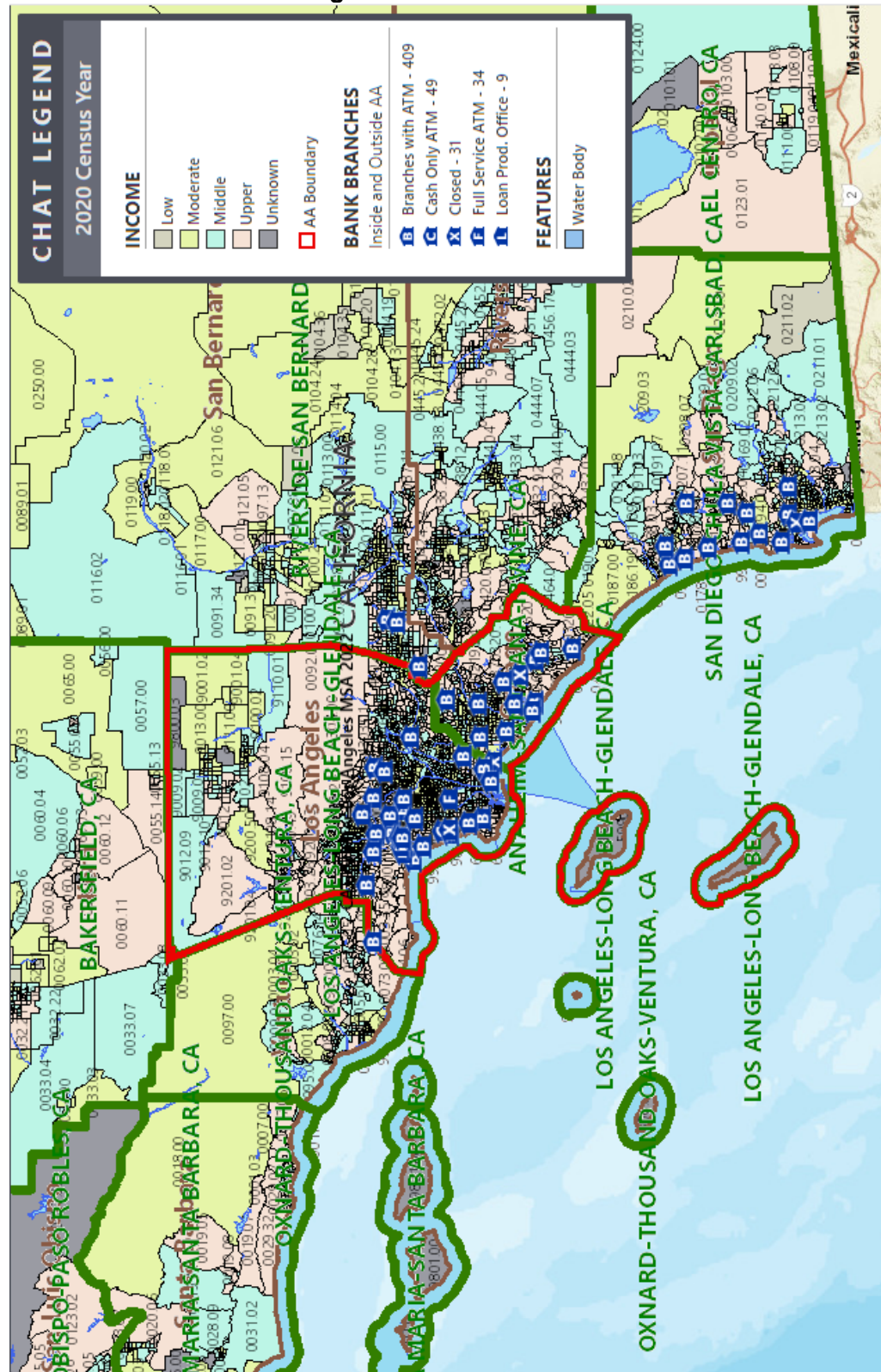
## APPENDICES

### APPENDIX A: FULL-SCOPE ASSESSMENT AREAS MAPS

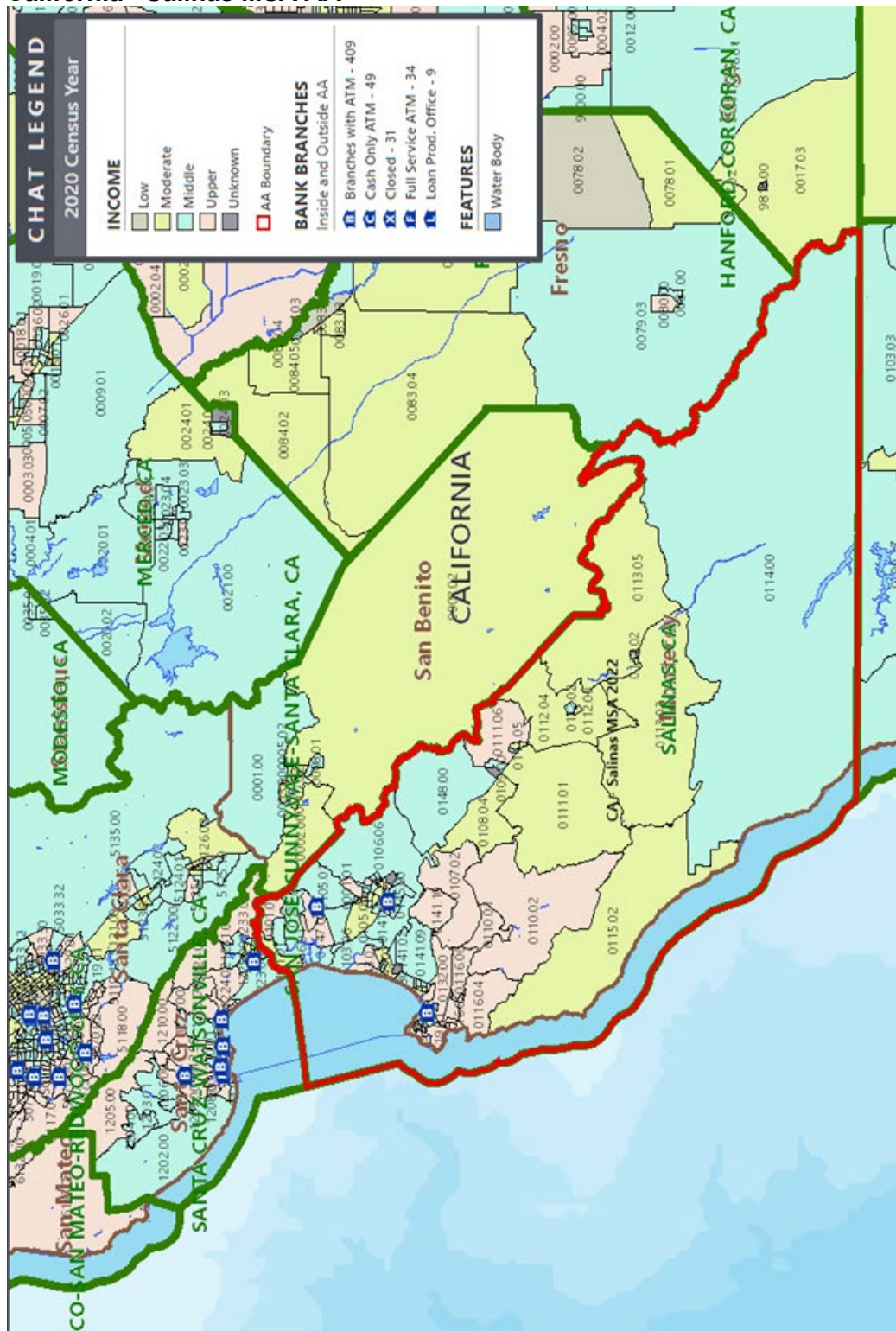
#### Arizona - Phoenix Metropolitan AA



California –Greater Los Angeles MSA AA

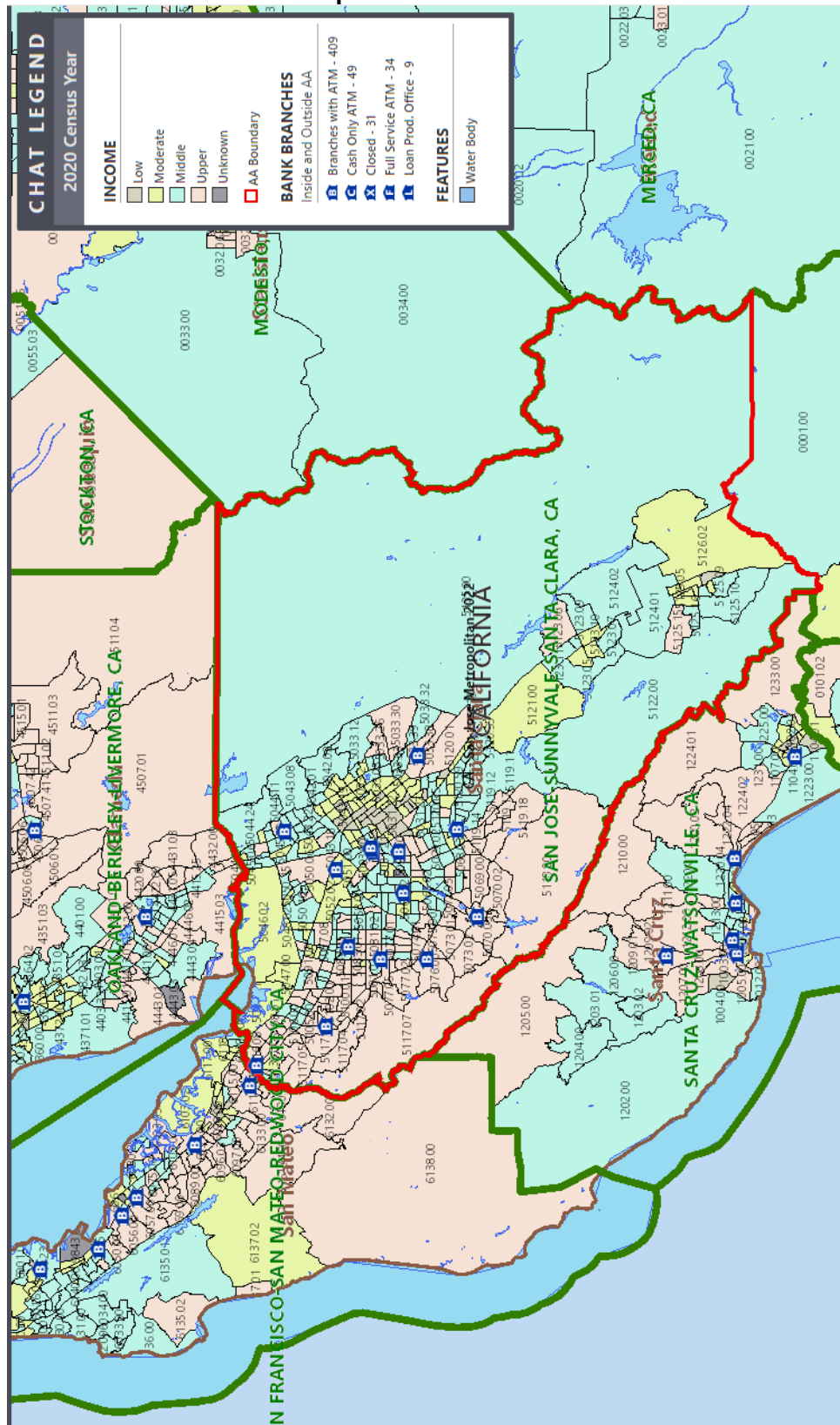


California - Salinas MSA AA





California - San Jose Metropolitan AA



[illegible]

**CHAT LEGEND**  
2020 Census Year

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

**BANK BRANCHES**  
Inside and Outside AA

- Branches with ATM - 409
- Cash Only ATM - 49
- Closed - 31
- Full Service ATM - 34
- Loan Prod. Office - 9

**FEATURES**

- Water Body

The map displays the following census tracts and their income levels:

- 00001: Low
- 00002: Low
- 00003: Low
- 00004: Low
- 00005: Low
- 00006: Low
- 00007: Low
- 00008: Low
- 00009: Low
- 00010: Low
- 00011: Low
- 00012: Low
- 00013: Low
- 00014: Low
- 00015: Low
- 00016: Low
- 00017: Low
- 00018: Low
- 00019: Low
- 00020: Low
- 00021: Low
- 00022: Low
- 00023: Low
- 00024: Low
- 00025: Low
- 00026: Low
- 00027: Low
- 00028: Low
- 00029: Low
- 00030: Low
- 00031: Low
- 00032: Low
- 00033: Low
- 00034: Low
- 00035: Low
- 00036: Low
- 00037: Low
- 00038: Low
- 00039: Low
- 00040: Low
- 00041: Low
- 00042: Low
- 00043: Low
- 00044: Low
- 00045: Low
- 00046: Low
- 00047: Low
- 00048: Low
- 00049: Low
- 00050: Low
- 00051: Low
- 00052: Low
- 00053: Low
- 00054: Low
- 00055: Low
- 00056: Low
- 00057: Low
- 00058: Low
- 00059: Low
- 00060: Low
- 00061: Low
- 00062: Low
- 00063: Low
- 00064: Low
- 00065: Low
- 00066: Low
- 00067: Low
- 00068: Low
- 00069: Low
- 00070: Low
- 00071: Low
- 00072: Low
- 00073: Low
- 00074: Low
- 00075: Low
- 00076: Low
- 00077: Low
- 00078: Low
- 00079: Low
- 00080: Low
- 00081: Low
- 00082: Low
- 00083: Low
- 00084: Low
- 00085: Low
- 00086: Low
- 00087: Low
- 00088: Low
- 00089: Low
- 00090: Low
- 00091: Low
- 00092: Low
- 00093: Low
- 00094: Low
- 00095: Low
- 00096: Low
- 00097: Low
- 00098: Low
- 00099: Low
- 00100: Low
- 00101: Low
- 00102: Low
- 00103: Low
- 00104: Low
- 00105: Low
- 00106: Low
- 00107: Low
- 00108: Low
- 00109: Low
- 00110: Low
- 00111: Low
- 00112: Low
- 00113: Low
- 00114: Low
- 00115: Low
- 00116: Low
- 00117: Low
- 00118: Low
- 00119: Low
- 00120: Low
- 00121: Low
- 00122: Low
- 00123: Low
- 00124: Low
- 00125: Low
- 00126: Low
- 00127: Low
- 00128: Low
- 00129: Low
- 00130: Low
- 00131: Low
- 00132: Low
- 00133: Low
- 00134: Low
- 00135: Low
- 00136: Low
- 00137: Low
- 00138: Low
- 00139: Low
- 00140: Low
- 00141: Low
- 00142: Low
- 00143: Low
- 00144: Low
- 00145: Low
- 00146: Low
- 00147: Low
- 00148: Low
- 00149: Low
- 00150: Low
- 00151: Low
- 00152: Low
- 00153: Low
- 00154: Low
- 00155: Low
- 00156: Low
- 00157: Low
- 00158: Low
- 00159: Low
- 00160: Low
- 00161: Low
- 00162: Low
- 00163: Low
- 00164: Low
- 00165: Low
- 00166: Low
- 00167: Low
- 00168: Low
- 00169: Low
- 00170: Low
- 00171: Low
- 00172: Low
- 00173: Low
- 00174: Low
- 00175: Low
- 00176: Low
- 00177: Low
- 00178: Low
- 00179: Low
- 00180: Low
- 00181: Low
- 00182: Low
- 00183: Low
- 00184: Low
- 00185: Low
- 00186: Low
- 00187: Low
- 00188: Low
- 00189: Low
- 00190: Low
- 00191: Low
- 00192: Low
- 00193: Low
- 00194: Low
- 00195: Low
- 00196: Low
- 00197: Low
- 00198: Low
- 00199: Low
- 00200: Low
- 00201: Low
- 00202: Low
- 00203: Low
- 00204: Low
- 00205: Low
- 00206: Low
- 00207: Low
- 00208: Low
- 00209: Low
- 00210: Low
- 00211: Low
- 00212: Low
- 00213: Low
- 00214: Low
- 00215: Low
- 00216: Low
- 00217: Low
- 00218: Low
- 00219: Low
- 00220: Low
- 00221: Low
- 00222: Low
- 00223: Low
- 00224: Low
- 00225: Low
- 00226: Low
- 00227: Low
- 00228: Low
- 00229: Low
- 00230: Low
- 00231: Low
- 00232: Low
- 00233: Low
- 00234: Low
- 00235: Low
- 00236: Low
- 00237: Low
- 00238: Low
- 00239: Low
- 00240: Low
- 00241: Low
- 00242: Low
- 00243: Low
- 00244: Low
- 00245: Low
- 00246: Low
- 00247: Low
- 00248: Low
- 00249: Low
- 00250: Low
- 00251: Low
- 00252: Low
- 00253: Low
- 00254: Low
- 00255: Low
- 00256: Low
- 00257: Low
- 00258: Low
- 00259: Low
- 00260: Low
- 00261: Low
- 00262: Low
- 00263: Low
- 00264: Low
- 00265: Low
- 00266: Low
- 00267: Low
- 00268: Low
- 00269: Low
- 00270: Low
- 00271: Low
- 00272: Low
- 00273: Low
- 00274: Low
- 00275: Low
- 00276: Low
- 00277: Low
- 00278: Low
- 00279: Low
- 00280: Low
- 00281: Low
- 00282: Low
- 00283: Low
- 00284: Low
- 00285: Low
- 00286: Low
- 00287: Low
- 00288: Low
- 00289: Low
- 00290: Low



**CHAT LEGEND**

**2020 Census Year**

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

**BANK BRANCHES**

- AA Boundary
- Branches with ATM - 409
- Cash Only ATM - 49
- Closed - 31
- Full Service ATM - 34
- Loan Prod. Office - 9

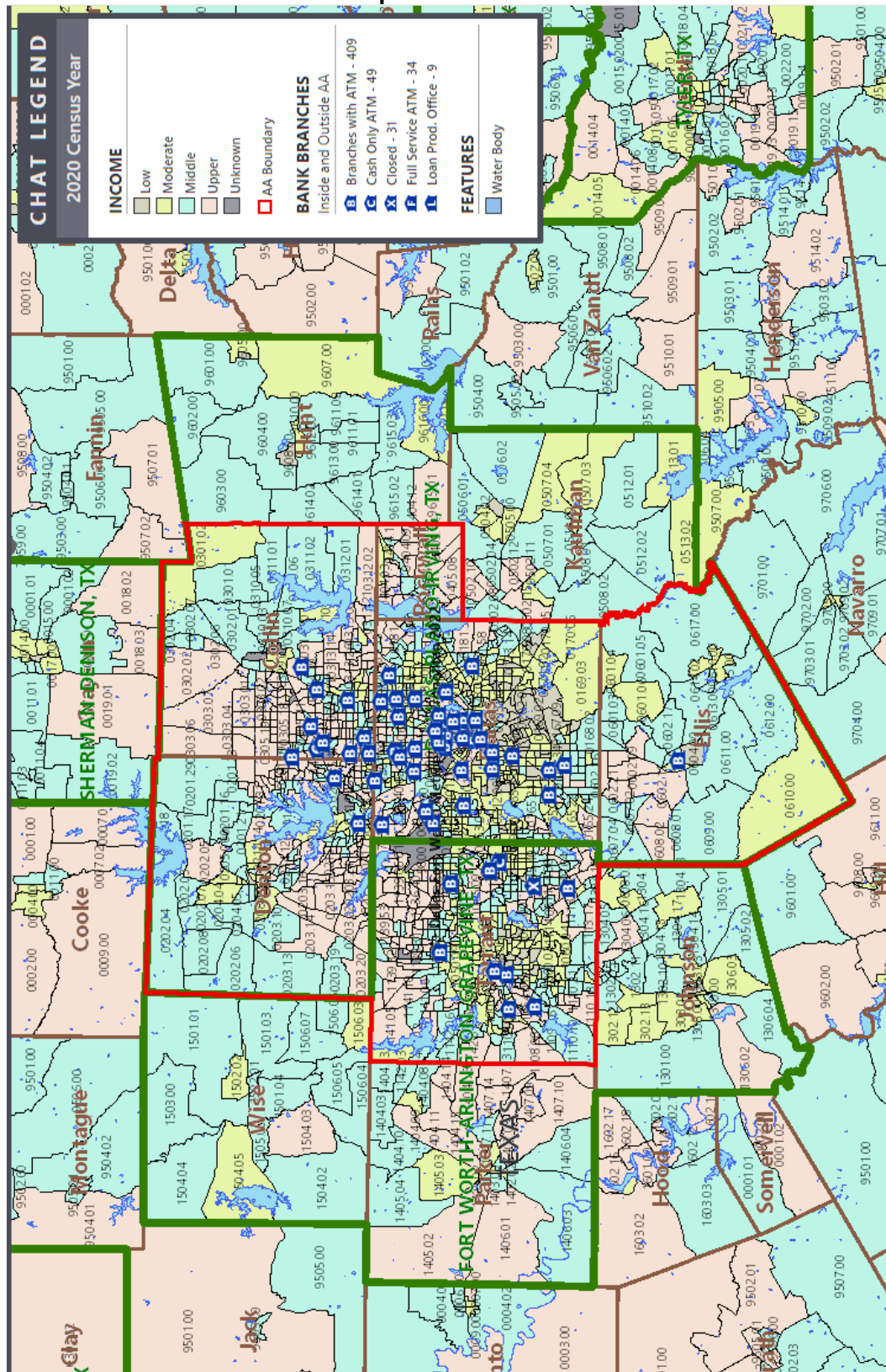
**FEATURES**

- Water Body

**Map Labels:**

- Oakland
- Warren
- Farmington Hills, MI
- Westland
- Wayne
- Michigan
- Detroit River

Texas - Dallas-Fort Worth Metropolitan AA



[illegible]

**APPENDIX B: FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION**

**Table B1**

| 2021 Combined Demographics                                                                                              |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Phoenix Metropolitan                                                                                   |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 105                       | 11.5                  | 85,067                             | 9.0          | 36,258                                             | 42.6         | 205,737                   | 21.8         |
| Moderate                                                                                                                | 206                       | 22.5                  | 196,635                            | 20.8         | 40,849                                             | 20.8         | 159,469                   | 16.9         |
| Middle                                                                                                                  | 286                       | 31.2                  | 304,008                            | 32.2         | 26,996                                             | 8.9          | 181,287                   | 19.2         |
| Upper                                                                                                                   | 306                       | 33.4                  | 359,132                            | 38.0         | 14,476                                             | 4.0          | 398,622                   | 42.2         |
| Unknown                                                                                                                 | 13                        | 1.4                   | 273                                | 0.0          | 66                                                 | 24.2         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>916</b>                | <b>100.0</b>          | <b>945,115</b>                     | <b>100.0</b> | <b>118,645</b>                                     | <b>12.6</b>  | <b>945,115</b>            | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 163,664                   | 39,860                | 4.6                                | 24.4         | 97,211                                             | 59.4         | 26,593                    | 16.2         |
| Moderate                                                                                                                | 389,700                   | 164,966               | 18.8                               | 42.3         | 166,953                                            | 42.8         | 57,781                    | 14.8         |
| Middle                                                                                                                  | 555,842                   | 303,545               | 34.7                               | 54.6         | 177,191                                            | 31.9         | 75,106                    | 13.5         |
| Upper                                                                                                                   | 557,288                   | 366,734               | 41.9                               | 65.8         | 124,339                                            | 22.3         | 66,215                    | 11.9         |
| Unknown                                                                                                                 | 2,061                     | 222                   | 0.0                                | 10.8         | 1,497                                              | 72.6         | 342                       | 16.6         |
| <b>Total AA</b>                                                                                                         | <b>1,668,555</b>          | <b>875,327</b>        | <b>100.0</b>                       | <b>52.5</b>  | <b>567,191</b>                                     | <b>34.0</b>  | <b>226,037</b>            | <b>13.5</b>  |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 15,923                    | 6.6                   | 13,829                             | 6.2          | 1,860                                              | 13.8         | 234                       | 8.0          |
| Moderate                                                                                                                | 40,174                    | 16.8                  | 36,776                             | 16.5         | 3,059                                              | 22.7         | 339                       | 11.6         |
| Middle                                                                                                                  | 68,380                    | 28.5                  | 64,312                             | 28.8         | 3,373                                              | 25.0         | 695                       | 23.7         |
| Upper                                                                                                                   | 113,836                   | 47.5                  | 107,237                            | 48.0         | 4,951                                              | 36.8         | 1,648                     | 56.2         |
| Unknown                                                                                                                 | 1,352                     | 0.6                   | 1,113                              | 0.5          | 225                                                | 1.7          | 14                        | 0.5          |
| <b>Total AA</b>                                                                                                         | <b>239,665</b>            | <b>100.0</b>          | <b>223,267</b>                     | <b>100.0</b> | <b>13,468</b>                                      | <b>100.0</b> | <b>2,930</b>              | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 93.2         |                                                    | 5.6          |                           | 1.2          |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 65                        | 3.6                   | 56                                 | 3.3          | 9                                                  | 11.7         | 0                         | 0.0          |
| Moderate                                                                                                                | 226                       | 12.6                  | 214                                | 12.5         | 12                                                 | 15.6         | 0                         | 0.0          |
| Middle                                                                                                                  | 504                       | 28.2                  | 477                                | 27.9         | 27                                                 | 35.1         | 0                         | 0.0          |
| Upper                                                                                                                   | 985                       | 55.1                  | 956                                | 55.9         | 29                                                 | 37.7         | 0                         | 0.0          |
| Unknown                                                                                                                 | 8                         | 0.4                   | 8                                  | 0.5          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>1,788</b>              | <b>100.0</b>          | <b>1,711</b>                       | <b>100.0</b> | <b>77</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 95.7         |                                                    | 4.3          |                           | 0.0          |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B2**

| 2020 Combined Demographics<br>Assessment Area: Phoenix Metropolitan                                                                                                                       |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 105                       | 11.5                  | 85,067                             | 9.0       | 36,258                                             | 42.6      | 205,737                   | 21.8      |
| Moderate                                                                                                                                                                                  | 206                       | 22.5                  | 196,635                            | 20.8      | 40,849                                             | 20.8      | 159,469                   | 16.9      |
| Middle                                                                                                                                                                                    | 286                       | 31.2                  | 304,008                            | 32.2      | 26,996                                             | 8.9       | 181,287                   | 19.2      |
| Upper                                                                                                                                                                                     | 306                       | 33.4                  | 359,132                            | 38.0      | 14,476                                             | 4.0       | 398,622                   | 42.2      |
| Unknown                                                                                                                                                                                   | 13                        | 1.4                   | 273                                | 0.0       | 66                                                 | 24.2      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 916                       | 100.0                 | 945,115                            | 100.0     | 118,645                                            | 12.6      | 945,115                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 163,664                   | 39,860                | 4.6                                | 24.4      | 97,211                                             | 59.4      | 26,593                    | 16.2      |
| Moderate                                                                                                                                                                                  | 389,700                   | 164,966               | 18.8                               | 42.3      | 166,953                                            | 42.8      | 57,781                    | 14.8      |
| Middle                                                                                                                                                                                    | 555,842                   | 303,545               | 34.7                               | 54.6      | 177,191                                            | 31.9      | 75,106                    | 13.5      |
| Upper                                                                                                                                                                                     | 557,288                   | 366,734               | 41.9                               | 65.8      | 124,339                                            | 22.3      | 66,215                    | 11.9      |
| Unknown                                                                                                                                                                                   | 2,061                     | 222                   | 0.0                                | 10.8      | 1,497                                              | 72.6      | 342                       | 16.6      |
| Total AA                                                                                                                                                                                  | 1,668,555                 | 875,327               | 100.0                              | 52.5      | 567,191                                            | 34.0      | 226,037                   | 13.5      |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 16,059                    | 6.6                   | 13,961                             | 6.2       | 1,880                                              | 13.8      | 218                       | 7.6       |
| Moderate                                                                                                                                                                                  | 40,654                    | 16.7                  | 37,226                             | 16.4      | 3,107                                              | 22.7      | 321                       | 11.2      |
| Middle                                                                                                                                                                                    | 69,132                    | 28.4                  | 65,016                             | 28.7      | 3,447                                              | 25.2      | 669                       | 23.3      |
| Upper                                                                                                                                                                                     | 116,007                   | 47.7                  | 109,352                            | 48.2      | 5,005                                              | 36.6      | 1,650                     | 57.6      |
| Unknown                                                                                                                                                                                   | 1,351                     | 0.6                   | 1,114                              | 0.5       | 228                                                | 1.7       | 9                         | 0.3       |
| Total AA                                                                                                                                                                                  | 243,203                   | 100.0                 | 226,669                            | 100.0     | 13,667                                             | 100.0     | 2,867                     | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 93.2      |                                                    | 5.6       |                           | 1.2       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 65                        | 3.6                   | 56                                 | 3.2       | 9                                                  | 11.7      | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 235                       | 13.0                  | 223                                | 12.9      | 12                                                 | 15.6      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 505                       | 28.0                  | 477                                | 27.6      | 28                                                 | 36.4      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 991                       | 54.9                  | 963                                | 55.8      | 28                                                 | 36.4      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 8                         | 0.4                   | 8                                  | 0.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,804                     | 100.0                 | 1,727                              | 100.0     | 77                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.7      |                                                    | 4.3       |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table B3**

| 2021 Combined Demographics<br>Assessment Area: Greater Los Angeles MSA                                                                                                                    |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 266                       | 9.1                   | 221,796                            | 7.6          | 78,727                                             | 35.5         | 709,610                   | 24.4         |
| Moderate                                                                                                                                                                                  | 821                       | 28.0                  | 788,614                            | 27.1         | 169,096                                            | 21.4         | 475,277                   | 16.3         |
| Middle                                                                                                                                                                                    | 760                       | 25.9                  | 773,794                            | 26.6         | 80,644                                             | 10.4         | 495,608                   | 17.0         |
| Upper                                                                                                                                                                                     | 1,028                     | 35.1                  | 1,126,100                          | 38.7         | 50,469                                             | 4.5          | 1,233,043                 | 42.3         |
| Unknown                                                                                                                                                                                   | 54                        | 1.8                   | 3,234                              | 0.1          | 609                                                | 18.8         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,929</b>              | <b>100.0</b>          | <b>2,913,538</b>                   | <b>100.0</b> | <b>379,545</b>                                     | <b>13.0</b>  | <b>2,913,538</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 340,504                   | 55,545                | 2.7                                | 16.3         | 263,439                                            | 77.4         | 21,520                    | 6.3          |
| Moderate                                                                                                                                                                                  | 1,171,395                 | 366,014               | 17.6                               | 31.2         | 739,185                                            | 63.1         | 66,196                    | 5.7          |
| Middle                                                                                                                                                                                    | 1,187,608                 | 572,472               | 27.5                               | 48.2         | 549,469                                            | 46.3         | 65,667                    | 5.5          |
| Upper                                                                                                                                                                                     | 1,822,595                 | 1,086,537             | 52.2                               | 59.6         | 622,692                                            | 34.2         | 113,366                   | 6.2          |
| Unknown                                                                                                                                                                                   | 19,258                    | 1,462                 | 0.1                                | 7.6          | 15,607                                             | 81.0         | 2,189                     | 11.4         |
| <b>Total AA</b>                                                                                                                                                                           | <b>4,541,360</b>          | <b>2,082,030</b>      | <b>100.0</b>                       | <b>45.8</b>  | <b>2,190,392</b>                                   | <b>48.2</b>  | <b>268,938</b>            | <b>5.9</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 35,548                    | 5.1                   | 32,165                             | 5.0          | 3,234                                              | 6.0          | 149                       | 4.0          |
| Moderate                                                                                                                                                                                  | 137,790                   | 19.7                  | 125,467                            | 19.5         | 11,738                                             | 21.8         | 585                       | 15.5         |
| Middle                                                                                                                                                                                    | 178,205                   | 25.5                  | 161,632                            | 25.2         | 15,743                                             | 29.3         | 830                       | 22.0         |
| Upper                                                                                                                                                                                     | 335,989                   | 48.0                  | 313,217                            | 48.7         | 20,677                                             | 38.5         | 2,095                     | 55.6         |
| Unknown                                                                                                                                                                                   | 12,482                    | 1.8                   | 10,038                             | 1.6          | 2,337                                              | 4.3          | 107                       | 2.8          |
| <b>Total AA</b>                                                                                                                                                                           | <b>700,014</b>            | <b>100.0</b>          | <b>642,519</b>                     | <b>100.0</b> | <b>53,729</b>                                      | <b>100.0</b> | <b>3,766</b>              | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 91.8         |                                                    | 7.7          |                           | 0.5          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 63                        | 2.6                   | 62                                 | 2.7          | 1                                                  | 1.2          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 384                       | 15.9                  | 364                                | 15.6         | 20                                                 | 23.3         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 566                       | 23.4                  | 539                                | 23.1         | 27                                                 | 31.4         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 1,379                     | 57.0                  | 1,341                              | 57.5         | 38                                                 | 44.2         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 27                        | 1.1                   | 27                                 | 1.2          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,419</b>              | <b>100.0</b>          | <b>2,333</b>                       | <b>100.0</b> | <b>86</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 96.4         |                                                    | 3.6          |                           | 0.0          |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B4**

| 2020 Combined Demographics<br>Assessment Area: Greater Los Angeles MSA                                                                                                                    |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 178                       | 5.7                   | 142,545                            | 4.8          | 39,818                                             | 27.9         | 699,400                   | 23.7         |
| Moderate                                                                                                                                                                                  | 856                       | 27.5                  | 792,186                            | 26.8         | 125,169                                            | 15.8         | 486,097                   | 16.5         |
| Middle                                                                                                                                                                                    | 926                       | 29.8                  | 905,587                            | 30.7         | 73,556                                             | 8.1          | 529,772                   | 17.9         |
| Upper                                                                                                                                                                                     | 1,071                     | 34.4                  | 1,098,658                          | 37.2         | 43,367                                             | 3.9          | 1,238,213                 | 41.9         |
| Unknown                                                                                                                                                                                   | 81                        | 2.6                   | 14,506                             | 0.5          | 1,991                                              | 13.7         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,112</b>              | <b>100.0</b>          | <b>2,953,482</b>                   | <b>100.0</b> | <b>283,901</b>                                     | <b>9.6</b>   | <b>2,953,482</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 225,201                   | 29,216                | 1.4                                | 13.0         | 183,218                                            | 81.4         | 12,767                    | 5.7          |
| Moderate                                                                                                                                                                                  | 1,184,434                 | 364,211               | 17.1                               | 30.7         | 758,418                                            | 64.0         | 61,805                    | 5.2          |
| Middle                                                                                                                                                                                    | 1,388,988                 | 672,356               | 31.6                               | 48.4         | 643,632                                            | 46.3         | 73,000                    | 5.3          |
| Upper                                                                                                                                                                                     | 1,803,716                 | 1,056,633             | 49.6                               | 58.6         | 613,113                                            | 34.0         | 133,970                   | 7.4          |
| Unknown                                                                                                                                                                                   | 58,695                    | 7,284                 | 0.3                                | 12.4         | 44,424                                             | 75.7         | 6,987                     | 11.9         |
| <b>Total AA</b>                                                                                                                                                                           | <b>4,661,034</b>          | <b>2,129,700</b>      | <b>100.0</b>                       | <b>45.7</b>  | <b>2,242,805</b>                                   | <b>48.1</b>  | <b>288,529</b>            | <b>6.2</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 24,565                    | 3.5                   | 22,190                             | 3.4          | 2,244                                              | 4.2          | 131                       | 2.9          |
| Moderate                                                                                                                                                                                  | 137,050                   | 19.3                  | 124,054                            | 19.1         | 12,320                                             | 23.0         | 676                       | 15.1         |
| Middle                                                                                                                                                                                    | 198,587                   | 28.0                  | 181,575                            | 27.9         | 15,911                                             | 29.7         | 1,101                     | 24.6         |
| Upper                                                                                                                                                                                     | 331,000                   | 46.7                  | 308,033                            | 47.3         | 20,530                                             | 38.3         | 2,437                     | 54.4         |
| Unknown                                                                                                                                                                                   | 17,876                    | 2.5                   | 15,185                             | 2.3          | 2,560                                              | 4.8          | 131                       | 2.9          |
| <b>Total AA</b>                                                                                                                                                                           | <b>709,078</b>            | <b>100.0</b>          | <b>651,037</b>                     | <b>100.0</b> | <b>53,565</b>                                      | <b>100.0</b> | <b>4,476</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>91.8</b>  |                                                    | <b>7.6</b>   |                           | <b>0.6</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 43                        | 1.8                   | 43                                 | 1.9          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 368                       | 15.4                  | 345                                | 14.9         | 23                                                 | 27.7         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 573                       | 24.0                  | 552                                | 23.9         | 21                                                 | 25.3         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 1,365                     | 57.1                  | 1,326                              | 57.4         | 39                                                 | 47.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 43                        | 1.8                   | 43                                 | 1.9          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,392</b>              | <b>100.0</b>          | <b>2,309</b>                       | <b>100.0</b> | <b>83</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>96.5</b>  |                                                    | <b>3.5</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B5**

| 2021 Combined Demographics<br>Assessment Area: Salinas MSA                                                                                                                                |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 3                         | 3.2                   | 2,494                              | 2.7       | 984                                                | 39.5      | 19,598                    | 21.6      |
| Moderate                                                                                                                                                                                  | 21                        | 22.3                  | 21,872                             | 24.1      | 5,327                                              | 24.4      | 16,276                    | 17.9      |
| Middle                                                                                                                                                                                    | 31                        | 33.0                  | 32,783                             | 36.1      | 3,861                                              | 11.8      | 16,962                    | 18.7      |
| Upper                                                                                                                                                                                     | 35                        | 37.2                  | 33,753                             | 37.1      | 1,667                                              | 4.9       | 38,078                    | 41.9      |
| Unknown                                                                                                                                                                                   | 4                         | 4.3                   | 12                                 | 0.0       | 4                                                  | 33.3      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 94                        | 100.0                 | 90,914                             | 100.0     | 11,843                                             | 13.0      | 90,914                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 3,377                     | 355                   | 0.6                                | 10.5      | 2,813                                              | 83.3      | 209                       | 6.2       |
| Moderate                                                                                                                                                                                  | 28,652                    | 9,451                 | 15.3                               | 33.0      | 17,692                                             | 61.7      | 1,509                     | 5.3       |
| Middle                                                                                                                                                                                    | 47,200                    | 20,920                | 33.9                               | 44.3      | 23,200                                             | 49.2      | 3,080                     | 6.5       |
| Upper                                                                                                                                                                                     | 60,522                    | 31,009                | 50.2                               | 51.2      | 19,919                                             | 32.9      | 9,594                     | 15.9      |
| Unknown                                                                                                                                                                                   | 43                        | 12                    | 0.0                                | 27.9      | 31                                                 | 72.1      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 139,794                   | 61,747                | 100.0                              | 44.2      | 63,655                                             | 45.5      | 14,392                    | 10.3      |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 614                       | 3.7                   | 565                                | 3.7       | 42                                                 | 3.7       | 7                         | 8.0       |
| Moderate                                                                                                                                                                                  | 2,096                     | 12.7                  | 1,950                              | 12.8      | 136                                                | 12.0      | 10                        | 11.5      |
| Middle                                                                                                                                                                                    | 5,011                     | 30.4                  | 4,562                              | 29.9      | 417                                                | 36.8      | 32                        | 36.8      |
| Upper                                                                                                                                                                                     | 8,710                     | 52.8                  | 8,149                              | 53.4      | 525                                                | 46.3      | 36                        | 41.4      |
| Unknown                                                                                                                                                                                   | 64                        | 0.4                   | 48                                 | 0.3       | 14                                                 | 1.2       | 2                         | 2.3       |
| Total AA                                                                                                                                                                                  | 16,495                    | 100.0                 | 15,274                             | 100.0     | 1,134                                              | 100.0     | 87                        | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.6      |                                                    | 6.9       |                           | 0.5       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 6                         | 1.1                   | 4                                  | 0.9       | 2                                                  | 1.7       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 99                        | 17.6                  | 61                                 | 13.8      | 38                                                 | 31.4      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 267                       | 47.4                  | 207                                | 46.8      | 60                                                 | 49.6      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 187                       | 33.2                  | 169                                | 38.2      | 18                                                 | 14.9      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 4                         | 0.7                   | 1                                  | 0.2       | 3                                                  | 2.5       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 563                       | 100.0                 | 442                                | 100.0     | 121                                                | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 78.5      |                                                    | 21.5      |                           | 0.0       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |



**Table B6**

| 2020 Combined Demographics<br>Assessment Area: Salinas MSA                                                                                                                                |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 3                         | 3.2                   | 2,494                              | 2.7       | 984                                                | 39.5      | 19,598                    | 21.6      |
| Moderate                                                                                                                                                                                  | 21                        | 22.3                  | 21,872                             | 24.1      | 5,327                                              | 24.4      | 16,276                    | 17.9      |
| Middle                                                                                                                                                                                    | 31                        | 33.0                  | 32,783                             | 36.1      | 3,861                                              | 11.8      | 16,962                    | 18.7      |
| Upper                                                                                                                                                                                     | 35                        | 37.2                  | 33,753                             | 37.1      | 1,667                                              | 4.9       | 38,078                    | 41.9      |
| Unknown                                                                                                                                                                                   | 4                         | 4.3                   | 12                                 | 0.0       | 4                                                  | 33.3      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 94                        | 100.0                 | 90,914                             | 100.0     | 11,843                                             | 13.0      | 90,914                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 3,377                     | 355                   | 0.6                                | 10.5      | 2,813                                              | 83.3      | 209                       | 6.2       |
| Moderate                                                                                                                                                                                  | 28,652                    | 9,451                 | 15.3                               | 33.0      | 17,692                                             | 61.7      | 1,509                     | 5.3       |
| Middle                                                                                                                                                                                    | 47,200                    | 20,920                | 33.9                               | 44.3      | 23,200                                             | 49.2      | 3,080                     | 6.5       |
| Upper                                                                                                                                                                                     | 60,522                    | 31,009                | 50.2                               | 51.2      | 19,919                                             | 32.9      | 9,594                     | 15.9      |
| Unknown                                                                                                                                                                                   | 43                        | 12                    | 0.0                                | 27.9      | 31                                                 | 72.1      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 139,794                   | 61,747                | 100.0                              | 44.2      | 63,655                                             | 45.5      | 14,392                    | 10.3      |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 631                       | 3.8                   | 585                                | 3.8       | 41                                                 | 3.5       | 5                         | 6.1       |
| Moderate                                                                                                                                                                                  | 2,095                     | 12.5                  | 1,948                              | 12.6      | 137                                                | 11.7      | 10                        | 12.2      |
| Middle                                                                                                                                                                                    | 5,068                     | 30.4                  | 4,608                              | 29.8      | 427                                                | 36.6      | 33                        | 40.2      |
| Upper                                                                                                                                                                                     | 8,835                     | 52.9                  | 8,254                              | 53.4      | 548                                                | 47.0      | 33                        | 40.2      |
| Unknown                                                                                                                                                                                   | 65                        | 0.4                   | 50                                 | 0.3       | 14                                                 | 1.2       | 1                         | 1.2       |
| Total AA                                                                                                                                                                                  | 16,694                    | 100.0                 | 15,445                             | 100.0     | 1,167                                              | 100.0     | 82                        | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.5      |                                                    | 7.0       |                           | 0.5       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 7                         | 1.2                   | 5                                  | 1.1       | 2                                                  | 1.5       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 97                        | 16.8                  | 59                                 | 13.2      | 38                                                 | 29.2      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 273                       | 47.3                  | 209                                | 46.8      | 64                                                 | 49.2      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 196                       | 34.0                  | 173                                | 38.7      | 23                                                 | 17.7      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 4                         | 0.7                   | 1                                  | 0.2       | 3                                                  | 2.3       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 577                       | 100.0                 | 447                                | 100.0     | 130                                                | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 77.5      |                                                    | 22.5      |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table B7**

| 2021 Combined Demographics<br>Assessment Area: San Jose Metropolitan                                                                                                                      |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 34                        | 9.1                   | 34,983                             | 7.8       | 7,016                                              | 20.1      | 106,442                   | 23.8      |
| Moderate                                                                                                                                                                                  | 77                        | 20.7                  | 83,269                             | 18.6      | 8,913                                              | 10.7      | 69,255                    | 15.5      |
| Middle                                                                                                                                                                                    | 136                       | 36.6                  | 164,673                            | 36.9      | 8,107                                              | 4.9       | 82,649                    | 18.5      |
| Upper                                                                                                                                                                                     | 124                       | 33.3                  | 163,795                            | 36.7      | 4,746                                              | 2.9       | 188,388                   | 42.2      |
| Unknown                                                                                                                                                                                   | 1                         | 0.3                   | 14                                 | 0.0       | 4                                                  | 28.6      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 372                       | 100.0                 | 446,734                            | 100.0     | 28,786                                             | 6.4       | 446,734                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 50,462                    | 15,496                | 4.4                                | 30.7      | 33,260                                             | 65.9      | 1,706                     | 3.4       |
| Moderate                                                                                                                                                                                  | 124,428                   | 54,515                | 15.5                               | 43.8      | 65,318                                             | 52.5      | 4,595                     | 3.7       |
| Middle                                                                                                                                                                                    | 243,890                   | 129,315               | 36.7                               | 53.0      | 105,120                                            | 43.1      | 9,455                     | 3.9       |
| Upper                                                                                                                                                                                     | 227,325                   | 153,510               | 43.5                               | 67.5      | 64,849                                             | 28.5      | 8,966                     | 3.9       |
| Unknown                                                                                                                                                                                   | 85                        | 0                     | 0.0                                | 0.0       | 80                                                 | 94.1      | 5                         | 5.9       |
| Total AA                                                                                                                                                                                  | 646,190                   | 352,836               | 100.0                              | 54.6      | 268,627                                            | 41.6      | 24,727                    | 3.8       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 5,536                     | 5.9                   | 5,097                              | 5.9       | 426                                                | 5.7       | 13                        | 3.4       |
| Moderate                                                                                                                                                                                  | 17,422                    | 18.5                  | 15,493                             | 18.0      | 1,858                                              | 24.9      | 71                        | 18.3      |
| Middle                                                                                                                                                                                    | 33,627                    | 35.8                  | 30,658                             | 35.6      | 2,841                                              | 38.1      | 128                       | 33.0      |
| Upper                                                                                                                                                                                     | 37,271                    | 39.7                  | 34,764                             | 40.4      | 2,331                                              | 31.2      | 176                       | 45.4      |
| Unknown                                                                                                                                                                                   | 142                       | 0.2                   | 134                                | 0.2       | 8                                                  | 0.1       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 93,998                    | 100.0                 | 86,146                             | 100.0     | 7,464                                              | 100.0     | 388                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 91.6      |                                                    | 7.9       |                           | 0.4       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 18                        | 3.5                   | 15                                 | 3.0       | 3                                                  | 13.6      | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 102                       | 19.6                  | 95                                 | 19.0      | 7                                                  | 31.8      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 178                       | 34.2                  | 172                                | 34.5      | 6                                                  | 27.3      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 223                       | 42.8                  | 217                                | 43.5      | 6                                                  | 27.3      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 521                       | 100.0                 | 499                                | 100.0     | 22                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.8      |                                                    | 4.2       |                           | 0.0       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table B8**

| 2020 Combined Demographics<br>Assessment Area: San Jose Metropolitan                                                                                                                      |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 34                        | 9.1                   | 34,983                             | 7.8       | 7,016                                              | 20.1      | 106,442                   | 23.8      |
| Moderate                                                                                                                                                                                  | 77                        | 20.7                  | 83,269                             | 18.6      | 8,913                                              | 10.7      | 69,255                    | 15.5      |
| Middle                                                                                                                                                                                    | 136                       | 36.6                  | 164,673                            | 36.9      | 8,107                                              | 4.9       | 82,649                    | 18.5      |
| Upper                                                                                                                                                                                     | 124                       | 33.3                  | 163,795                            | 36.7      | 4,746                                              | 2.9       | 188,388                   | 42.2      |
| Unknown                                                                                                                                                                                   | 1                         | 0.3                   | 14                                 | 0.0       | 4                                                  | 28.6      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 372                       | 100.0                 | 446,734                            | 100.0     | 28,786                                             | 6.4       | 446,734                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 50,462                    | 15,496                | 4.4                                | 30.7      | 33,260                                             | 65.9      | 1,706                     | 3.4       |
| Moderate                                                                                                                                                                                  | 124,428                   | 54,515                | 15.5                               | 43.8      | 65,318                                             | 52.5      | 4,595                     | 3.7       |
| Middle                                                                                                                                                                                    | 243,890                   | 129,315               | 36.7                               | 53.0      | 105,120                                            | 43.1      | 9,455                     | 3.9       |
| Upper                                                                                                                                                                                     | 227,325                   | 153,510               | 43.5                               | 67.5      | 64,849                                             | 28.5      | 8,966                     | 3.9       |
| Unknown                                                                                                                                                                                   | 85                        | 0                     | 0.0                                | 0.0       | 80                                                 | 94.1      | 5                         | 5.9       |
| Total AA                                                                                                                                                                                  | 646,190                   | 352,836               | 100.0                              | 54.6      | 268,627                                            | 41.6      | 24,727                    | 3.8       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 5,673                     | 5.9                   | 5,213                              | 6.0       | 450                                                | 5.8       | 10                        | 2.7       |
| Moderate                                                                                                                                                                                  | 17,592                    | 18.4                  | 15,626                             | 17.9      | 1,910                                              | 24.7      | 56                        | 15.3      |
| Middle                                                                                                                                                                                    | 34,198                    | 35.8                  | 31,116                             | 35.6      | 2,968                                              | 38.4      | 114                       | 31.1      |
| Upper                                                                                                                                                                                     | 37,827                    | 39.6                  | 35,242                             | 40.4      | 2,398                                              | 31.0      | 187                       | 51.0      |
| Unknown                                                                                                                                                                                   | 146                       | 0.2                   | 139                                | 0.2       | 7                                                  | 0.1       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 95,436                    | 100.0                 | 87,336                             | 100.0     | 7,733                                              | 100.0     | 367                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 91.5      |                                                    | 8.1       |                           | 0.4       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 14                        | 2.7                   | 10                                 | 2.0       | 4                                                  | 17.4      | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 96                        | 18.2                  | 90                                 | 17.8      | 6                                                  | 26.1      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 184                       | 34.8                  | 177                                | 35.0      | 7                                                  | 30.4      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 234                       | 44.3                  | 228                                | 45.1      | 6                                                  | 26.1      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 528                       | 100.0                 | 505                                | 100.0     | 23                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.6      |                                                    | 4.4       |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table B9**

| 2021 Combined Demographics                                                                                                                                                                |                           |                                    |                          |                  |                                                    |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                                                                                             |                           |                                    |                          |                  |                                                    |                      |                           |           |
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 46                        | 6.6                                | 38,360                   | 5.1              | 13,741                                             | 35.8                 | 170,515                   | 22.5      |
| Moderate                                                                                                                                                                                  | 200                       | 28.6                               | 198,146                  | 26.1             | 35,130                                             | 17.7                 | 131,423                   | 17.3      |
| Middle                                                                                                                                                                                    | 209                       | 29.9                               | 243,260                  | 32.1             | 21,589                                             | 8.9                  | 139,003                   | 18.3      |
| Upper                                                                                                                                                                                     | 232                       | 33.1                               | 277,881                  | 36.6             | 12,156                                             | 4.4                  | 317,464                   | 41.9      |
| Unknown                                                                                                                                                                                   | 13                        | 1.9                                | 758                      | 0.1              | 99                                                 | 13.1                 | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 700                       | 100.0                              | 758,405                  | 100.0            | 82,715                                             | 10.9                 | 758,405                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 84,408                    | 23,483                             | 3.0                      | 27.8             | 43,165                                             | 51.1                 | 17,760                    | 21.0      |
| Moderate                                                                                                                                                                                  | 418,623                   | 192,055                            | 24.2                     | 45.9             | 143,732                                            | 34.3                 | 82,836                    | 19.8      |
| Middle                                                                                                                                                                                    | 474,546                   | 265,611                            | 33.4                     | 56.0             | 130,415                                            | 27.5                 | 78,520                    | 16.5      |
| Upper                                                                                                                                                                                     | 506,206                   | 313,212                            | 39.4                     | 61.9             | 91,766                                             | 18.1                 | 101,228                   | 20.0      |
| Unknown                                                                                                                                                                                   | 1,988                     | 851                                | 0.1                      | 42.8             | 599                                                | 30.1                 | 538                       | 27.1      |
| Total AA                                                                                                                                                                                  | 1,485,771                 | 795,212                            | 100.0                    | 53.5             | 409,677                                            | 27.6                 | 280,882                   | 18.9      |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 16,727                    | 5.4                                | 15,064                   | 5.2              | 1,493                                              | 9.8                  | 170                       | 4.9       |
| Moderate                                                                                                                                                                                  | 71,890                    | 23.3                               | 67,293                   | 23.2             | 4,031                                              | 26.5                 | 566                       | 16.3      |
| Middle                                                                                                                                                                                    | 93,985                    | 30.5                               | 89,148                   | 30.8             | 3,962                                              | 26.1                 | 875                       | 25.3      |
| Upper                                                                                                                                                                                     | 124,790                   | 40.5                               | 117,353                  | 40.5             | 5,600                                              | 36.9                 | 1,837                     | 53.1      |
| Unknown                                                                                                                                                                                   | 893                       | 0.3                                | 781                      | 0.3              | 98                                                 | 0.6                  | 14                        | 0.4       |
| Total AA                                                                                                                                                                                  | 308,285                   | 100.0                              | 289,639                  | 100.0            | 15,184                                             | 100.0                | 3,462                     | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    |                          | 94.0             |                                                    | 4.9                  |                           | 1.1       |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 58                        | 3.9                                | 52                       | 3.6              | 6                                                  | 11.5                 | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 239                       | 15.9                               | 225                      | 15.5             | 14                                                 | 26.9                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 458                       | 30.4                               | 448                      | 30.8             | 10                                                 | 19.2                 | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 745                       | 49.5                               | 723                      | 49.8             | 22                                                 | 42.3                 | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 5                         | 0.3                                | 5                        | 0.3              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,505                     | 100.0                              | 1,453                    | 100.0            | 52                                                 | 100.0                | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    |                          | 96.5             |                                                    | 3.5                  |                           | 0.0       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |

**Table B10**

| 2020 Combined Demographics                                                                                                                                                                |                           |                                    |                          |                  |                                                    |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                                                                                             |                           |                                    |                          |                  |                                                    |                      |                           |           |
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 46                        | 6.6                                | 38,360                   | 5.1              | 13,741                                             | 35.8                 | 170,515                   | 22.5      |
| Moderate                                                                                                                                                                                  | 200                       | 28.6                               | 198,146                  | 26.1             | 35,130                                             | 17.7                 | 131,423                   | 17.3      |
| Middle                                                                                                                                                                                    | 209                       | 29.9                               | 243,260                  | 32.1             | 21,589                                             | 8.9                  | 139,003                   | 18.3      |
| Upper                                                                                                                                                                                     | 232                       | 33.1                               | 277,881                  | 36.6             | 12,156                                             | 4.4                  | 317,464                   | 41.9      |
| Unknown                                                                                                                                                                                   | 13                        | 1.9                                | 758                      | 0.1              | 99                                                 | 13.1                 | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 700                       | 100.0                              | 758,405                  | 100.0            | 82,715                                             | 10.9                 | 758,405                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 84,408                    | 23,483                             | 3.0                      | 27.8             | 43,165                                             | 51.1                 | 17,760                    | 21.0      |
| Moderate                                                                                                                                                                                  | 418,623                   | 192,055                            | 24.2                     | 45.9             | 143,732                                            | 34.3                 | 82,836                    | 19.8      |
| Middle                                                                                                                                                                                    | 474,546                   | 265,611                            | 33.4                     | 56.0             | 130,415                                            | 27.5                 | 78,520                    | 16.5      |
| Upper                                                                                                                                                                                     | 506,206                   | 313,212                            | 39.4                     | 61.9             | 91,766                                             | 18.1                 | 101,228                   | 20.0      |
| Unknown                                                                                                                                                                                   | 1,988                     | 851                                | 0.1                      | 42.8             | 599                                                | 30.1                 | 538                       | 27.1      |
| Total AA                                                                                                                                                                                  | 1,485,771                 | 795,212                            | 100.0                    | 53.5             | 409,677                                            | 27.6                 | 280,882                   | 18.9      |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 16,312                    | 5.3                                | 14,642                   | 5.1              | 1,517                                              | 9.8                  | 153                       | 4.6       |
| Moderate                                                                                                                                                                                  | 70,932                    | 23.1                               | 66,261                   | 23.0             | 4,146                                              | 26.8                 | 525                       | 15.7      |
| Middle                                                                                                                                                                                    | 93,696                    | 30.5                               | 88,810                   | 30.8             | 4,050                                              | 26.2                 | 836                       | 25.0      |
| Upper                                                                                                                                                                                     | 125,689                   | 40.9                               | 118,217                  | 40.9             | 5,660                                              | 36.6                 | 1,812                     | 54.3      |
| Unknown                                                                                                                                                                                   | 886                       | 0.3                                | 779                      | 0.3              | 94                                                 | 0.6                  | 13                        | 0.4       |
| Total AA                                                                                                                                                                                  | 307,515                   | 100.0                              | 288,709                  | 100.0            | 15,467                                             | 100.0                | 3,339                     | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    |                          | 93.9             |                                                    | 5.0                  |                           | 1.1       |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 64                        | 4.2                                | 58                       | 3.9              | 6                                                  | 11.5                 | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 228                       | 15.0                               | 216                      | 14.7             | 12                                                 | 23.1                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 460                       | 30.2                               | 448                      | 30.5             | 12                                                 | 23.1                 | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 766                       | 50.3                               | 744                      | 50.6             | 22                                                 | 42.3                 | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 5                         | 0.3                                | 5                        | 0.3              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,523                     | 100.0                              | 1,471                    | 100.0            | 52                                                 | 100.0                | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    |                          | 96.6             |                                                    | 3.4                  |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |

Table B11

| 2021 Combined Demographics                                                                                                                                                                |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Southeast Michigan Metropolitan                                                                                                                                          |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 170                       | 13.6                  | 89,261                             | 8.6       | 38,094                                             | 42.7      | 235,842                   | 22.7      |
| Moderate                                                                                                                                                                                  | 315                       | 25.2                  | 224,494                            | 21.6      | 49,928                                             | 22.2      | 171,317                   | 16.5      |
| Middle                                                                                                                                                                                    | 385                       | 30.8                  | 355,029                            | 34.2      | 29,622                                             | 8.3       | 194,851                   | 18.8      |
| Upper                                                                                                                                                                                     | 357                       | 28.5                  | 367,439                            | 35.4      | 14,878                                             | 4.0       | 435,805                   | 42.0      |
| Unknown                                                                                                                                                                                   | 24                        | 1.9                   | 1,592                              | 0.2       | 599                                                | 37.6      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,251                     | 100.0                 | 1,037,815                          | 100.0     | 133,121                                            | 12.8      | 1,037,815                 | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 219,705                   | 66,878                | 6.1                                | 30.4      | 93,384                                             | 42.5      | 59,443                    | 27.1      |
| Moderate                                                                                                                                                                                  | 455,152                   | 213,581               | 19.4                               | 46.9      | 161,487                                            | 35.5      | 80,084                    | 17.6      |
| Middle                                                                                                                                                                                    | 594,357                   | 399,322               | 36.3                               | 67.2      | 148,286                                            | 24.9      | 46,749                    | 7.9       |
| Upper                                                                                                                                                                                     | 543,945                   | 418,763               | 38.1                               | 77.0      | 93,215                                             | 17.1      | 31,967                    | 5.9       |
| Unknown                                                                                                                                                                                   | 6,352                     | 1,466                 | 0.1                                | 23.1      | 2,423                                              | 38.1      | 2,463                     | 38.8      |
| Total AA                                                                                                                                                                                  | 1,819,511                 | 1,100,010             | 100.0                              | 60.5      | 498,795                                            | 27.4      | 220,706                   | 12.1      |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 15,877                    | 8.0                   | 14,015                             | 7.7       | 1,762                                              | 10.8      | 100                       | 7.2       |
| Moderate                                                                                                                                                                                  | 42,283                    | 21.3                  | 37,975                             | 21.0      | 4,027                                              | 24.8      | 281                       | 20.1      |
| Middle                                                                                                                                                                                    | 61,517                    | 31.0                  | 57,012                             | 31.5      | 4,103                                              | 25.2      | 402                       | 28.8      |
| Upper                                                                                                                                                                                     | 77,948                    | 39.2                  | 71,239                             | 39.3      | 6,104                                              | 37.5      | 605                       | 43.4      |
| Unknown                                                                                                                                                                                   | 1,126                     | 0.6                   | 859                                | 0.5       | 260                                                | 1.6       | 7                         | 0.5       |
| Total AA                                                                                                                                                                                  | 198,751                   | 100.0                 | 181,100                            | 100.0     | 16,256                                             | 100.0     | 1,395                     | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 91.1      |                                                    | 8.2       |                           | 0.7       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 35                        | 3.0                   | 34                                 | 3.0       | 1                                                  | 3.2       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 229                       | 19.4                  | 224                                | 19.5      | 5                                                  | 16.1      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 534                       | 45.3                  | 523                                | 45.6      | 11                                                 | 35.5      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 381                       | 32.3                  | 366                                | 31.9      | 14                                                 | 45.2      | 1                         | 100.0     |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,179                     | 100.0                 | 1,147                              | 100.0     | 31                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 97.3      |                                                    | 2.6       |                           | 0.1       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table B12**

| 2020 Combined Demographics<br>Assessment Area: Southeast Michigan Metropolitan                                                                                                            |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 170                       | 13.6                  | 89,261                             | 8.6          | 38,094                                             | 42.7         | 235,842                   | 22.7         |
| Moderate                                                                                                                                                                                  | 315                       | 25.2                  | 224,494                            | 21.6         | 49,928                                             | 22.2         | 171,317                   | 16.5         |
| Middle                                                                                                                                                                                    | 385                       | 30.8                  | 355,029                            | 34.2         | 29,622                                             | 8.3          | 194,851                   | 18.8         |
| Upper                                                                                                                                                                                     | 357                       | 28.5                  | 367,439                            | 35.4         | 14,878                                             | 4.0          | 435,805                   | 42.0         |
| Unknown                                                                                                                                                                                   | 24                        | 1.9                   | 1,592                              | 0.2          | 599                                                | 37.6         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,251</b>              | <b>100.0</b>          | <b>1,037,815</b>                   | <b>100.0</b> | <b>133,121</b>                                     | <b>12.8</b>  | <b>1,037,815</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    | Rental       |                                                    | Vacant       |                           |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 219,705                   | 66,878                | 6.1                                | 30.4         | 93,384                                             | 42.5         | 59,443                    | 27.1         |
| Moderate                                                                                                                                                                                  | 455,152                   | 213,581               | 19.4                               | 46.9         | 161,487                                            | 35.5         | 80,084                    | 17.6         |
| Middle                                                                                                                                                                                    | 594,357                   | 399,322               | 36.3                               | 67.2         | 148,286                                            | 24.9         | 46,749                    | 7.9          |
| Upper                                                                                                                                                                                     | 543,945                   | 418,763               | 38.1                               | 77.0         | 93,215                                             | 17.1         | 31,967                    | 5.9          |
| Unknown                                                                                                                                                                                   | 6,352                     | 1,466                 | 0.1                                | 23.1         | 2,423                                              | 38.1         | 2,463                     | 38.8         |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,819,511</b>          | <b>1,100,010</b>      | <b>100.0</b>                       | <b>60.5</b>  | <b>498,795</b>                                     | <b>27.4</b>  | <b>220,706</b>            | <b>12.1</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 14,861                    | 7.6                   | 12,977                             | 7.3          | 1,799                                              | 10.7         | 85                        | 6.5          |
| Moderate                                                                                                                                                                                  | 40,252                    | 20.6                  | 35,866                             | 20.2         | 4,121                                              | 24.6         | 265                       | 20.2         |
| Middle                                                                                                                                                                                    | 60,986                    | 31.2                  | 56,378                             | 31.8         | 4,238                                              | 25.3         | 370                       | 28.1         |
| Upper                                                                                                                                                                                     | 78,383                    | 40.1                  | 71,482                             | 40.3         | 6,314                                              | 37.7         | 587                       | 44.6         |
| Unknown                                                                                                                                                                                   | 1,098                     | 0.6                   | 823                                | 0.5          | 267                                                | 1.6          | 8                         | 0.6          |
| <b>Total AA</b>                                                                                                                                                                           | <b>195,580</b>            | <b>100.0</b>          | <b>177,526</b>                     | <b>100.0</b> | <b>16,739</b>                                      | <b>100.0</b> | <b>1,315</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>90.8</b>  |                                                    | <b>8.6</b>   |                           | <b>0.7</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 31                        | 2.6                   | 29                                 | 2.5          | 2                                                  | 6.5          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 229                       | 19.1                  | 224                                | 19.2         | 5                                                  | 16.1         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 553                       | 46.1                  | 542                                | 46.4         | 11                                                 | 35.5         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 387                       | 32.3                  | 373                                | 31.9         | 13                                                 | 41.9         | 1                         | 100.0        |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,200</b>              | <b>100.0</b>          | <b>1,168</b>                       | <b>100.0</b> | <b>31</b>                                          | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>97.3</b>  |                                                    | <b>2.6</b>   |                           | <b>0.1</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B13**

| 2021 Combined Demographics<br>Assessment Area: Ann Arbor MSA                                                            |                           |                       |                                    |              |                                           |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|-------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                         | %            | #                         | %            |
| Low                                                                                                                     | 16                        | 16.0                  | 8,921                              | 11.2         | 2,461                                     | 27.6         | 18,032                    | 22.7         |
| Moderate                                                                                                                | 16                        | 16.0                  | 10,689                             | 13.5         | 1,261                                     | 11.8         | 13,501                    | 17.0         |
| Middle                                                                                                                  | 37                        | 37.0                  | 33,861                             | 42.7         | 2,054                                     | 6.1          | 15,572                    | 19.6         |
| Upper                                                                                                                   | 25                        | 25.0                  | 25,698                             | 32.4         | 484                                       | 1.9          | 32,268                    | 40.7         |
| Unknown                                                                                                                 | 6                         | 6.0                   | 204                                | 0.3          | 67                                        | 32.8         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>100</b>                | <b>100.0</b>          | <b>79,373</b>                      | <b>100.0</b> | <b>6,327</b>                              | <b>8.0</b>   | <b>79,373</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                           |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                    |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                         | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 23,605                    | 5,440                 | 6.6                                | 23.0         | 15,959                                    | 67.6         | 2,206                     | 9.3          |
| Moderate                                                                                                                | 21,049                    | 9,873                 | 12.0                               | 46.9         | 9,787                                     | 46.5         | 1,389                     | 6.6          |
| Middle                                                                                                                  | 60,457                    | 36,901                | 44.7                               | 61.0         | 19,025                                    | 31.5         | 4,531                     | 7.5          |
| Upper                                                                                                                   | 40,983                    | 30,117                | 36.5                               | 73.5         | 8,317                                     | 20.3         | 2,549                     | 6.2          |
| Unknown                                                                                                                 | 3,004                     | 194                   | 0.2                                | 6.5          | 2,454                                     | 81.7         | 356                       | 11.9         |
| <b>Total AA</b>                                                                                                         | <b>149,098</b>            | <b>82,525</b>         | <b>100.0</b>                       | <b>55.3</b>  | <b>55,542</b>                             | <b>37.3</b>  | <b>11,031</b>             | <b>7.4</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                           |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                          |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                         | %            | #                         | %            |
| Low                                                                                                                     | 1,545                     | 8.9                   | 1,415                              | 8.9          | 124                                       | 8.9          | 6                         | 5.3          |
| Moderate                                                                                                                | 1,629                     | 9.4                   | 1,532                              | 9.7          | 89                                        | 6.4          | 8                         | 7.0          |
| Middle                                                                                                                  | 7,656                     | 44.2                  | 6,956                              | 44.0         | 649                                       | 46.5         | 51                        | 44.7         |
| Upper                                                                                                                   | 5,522                     | 31.9                  | 5,069                              | 32.0         | 410                                       | 29.4         | 43                        | 37.7         |
| Unknown                                                                                                                 | 983                       | 5.7                   | 854                                | 5.4          | 123                                       | 8.8          | 6                         | 5.3          |
| <b>Total AA</b>                                                                                                         | <b>17,335</b>             | <b>100.0</b>          | <b>15,826</b>                      | <b>100.0</b> | <b>1,395</b>                              | <b>100.0</b> | <b>114</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 91.3         |                                           | 8.0          |                           | 0.7          |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                           |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                          |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                         | %            | #                         | %            |
| Low                                                                                                                     | 1                         | 0.3                   | 1                                  | 0.3          | 0                                         | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 16                        | 4.6                   | 15                                 | 4.4          | 1                                         | 33.3         | 0                         | 0.0          |
| Middle                                                                                                                  | 223                       | 64.6                  | 221                                | 64.8         | 2                                         | 66.7         | 0                         | 0.0          |
| Upper                                                                                                                   | 105                       | 30.4                  | 104                                | 30.5         | 0                                         | 0.0          | 1                         | 100.0        |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                         | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>345</b>                | <b>100.0</b>          | <b>341</b>                         | <b>100.0</b> | <b>3</b>                                  | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 98.8         |                                           | 0.9          |                           | 0.3          |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                           |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                           |              |                           |              |



**Table B14**

| 2020 Combined Demographics<br>Assessment Area: Ann Arbor MSA                                                                                                                              |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 16                        | 16.0                  | 8,921                              | 11.2         | 2,461                                              | 27.6         | 18,032                    | 22.7         |
| Moderate                                                                                                                                                                                  | 16                        | 16.0                  | 10,689                             | 13.5         | 1,261                                              | 11.8         | 13,501                    | 17.0         |
| Middle                                                                                                                                                                                    | 37                        | 37.0                  | 33,861                             | 42.7         | 2,054                                              | 6.1          | 15,572                    | 19.6         |
| Upper                                                                                                                                                                                     | 25                        | 25.0                  | 25,698                             | 32.4         | 484                                                | 1.9          | 32,268                    | 40.7         |
| Unknown                                                                                                                                                                                   | 6                         | 6.0                   | 204                                | 0.3          | 67                                                 | 32.8         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>100</b>                | <b>100.0</b>          | <b>79,373</b>                      | <b>100.0</b> | <b>6,327</b>                                       | <b>8.0</b>   | <b>79,373</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 23,605                    | 5,440                 | 6.6                                | 23.0         | 15,959                                             | 67.6         | 2,206                     | 9.3          |
| Moderate                                                                                                                                                                                  | 21,049                    | 9,873                 | 12.0                               | 46.9         | 9,787                                              | 46.5         | 1,389                     | 6.6          |
| Middle                                                                                                                                                                                    | 60,457                    | 36,901                | 44.7                               | 61.0         | 19,025                                             | 31.5         | 4,531                     | 7.5          |
| Upper                                                                                                                                                                                     | 40,983                    | 30,117                | 36.5                               | 73.5         | 8,317                                              | 20.3         | 2,549                     | 6.2          |
| Unknown                                                                                                                                                                                   | 3,004                     | 194                   | 0.2                                | 6.5          | 2,454                                              | 81.7         | 356                       | 11.9         |
| <b>Total AA</b>                                                                                                                                                                           | <b>149,098</b>            | <b>82,525</b>         | <b>100.0</b>                       | <b>55.3</b>  | <b>55,542</b>                                      | <b>37.3</b>  | <b>11,031</b>             | <b>7.4</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1,525                     | 8.7                   | 1,381                              | 8.6          | 139                                                | 9.7          | 5                         | 4.5          |
| Moderate                                                                                                                                                                                  | 1,621                     | 9.2                   | 1,520                              | 9.5          | 94                                                 | 6.6          | 7                         | 6.3          |
| Middle                                                                                                                                                                                    | 7,712                     | 43.8                  | 7,006                              | 43.7         | 652                                                | 45.7         | 54                        | 48.6         |
| Upper                                                                                                                                                                                     | 5,652                     | 32.1                  | 5,204                              | 32.4         | 409                                                | 28.6         | 39                        | 35.1         |
| Unknown                                                                                                                                                                                   | 1,078                     | 6.1                   | 938                                | 5.8          | 134                                                | 9.4          | 6                         | 5.4          |
| <b>Total AA</b>                                                                                                                                                                           | <b>17,588</b>             | <b>100.0</b>          | <b>16,049</b>                      | <b>100.0</b> | <b>1,428</b>                                       | <b>100.0</b> | <b>111</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 91.2         |                                                    | 8.1          |                           | 0.6          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1                         | 0.3                   | 1                                  | 0.3          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 17                        | 4.7                   | 16                                 | 4.5          | 1                                                  | 33.3         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 232                       | 64.8                  | 230                                | 65.0         | 2                                                  | 66.7         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 108                       | 30.2                  | 107                                | 30.2         | 0                                                  | 0.0          | 1                         | 100.0        |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>358</b>                | <b>100.0</b>          | <b>354</b>                         | <b>100.0</b> | <b>3</b>                                           | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 98.9         |                                                    | 0.8          |                           | 0.3          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B15**

| 2021 Combined Demographics<br>Assessment Area: Dallas-Fort Worth Metropolitan                                           |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 165                       | 13.6                  | 150,315                            | 9.9          | 51,375                                             | 34.2         | 355,209                   | 23.4         |
| Moderate                                                                                                                | 313                       | 25.7                  | 348,387                            | 23.0         | 66,076                                             | 19.0         | 247,628                   | 16.3         |
| Middle                                                                                                                  | 324                       | 26.6                  | 437,370                            | 28.8         | 36,242                                             | 8.3          | 272,854                   | 18.0         |
| Upper                                                                                                                   | 408                       | 33.5                  | 578,925                            | 38.2         | 20,318                                             | 3.5          | 640,794                   | 42.3         |
| Unknown                                                                                                                 | 7                         | 0.6                   | 1,488                              | 0.1          | 273                                                | 18.3         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>1,217</b>              | <b>100.0</b>          | <b>1,516,485</b>                   | <b>100.0</b> | <b>174,284</b>                                     | <b>11.5</b>  | <b>1,516,485</b>          | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 283,665                   | 69,970                | 5.4                                | 24.7         | 175,995                                            | 62.0         | 37,700                    | 13.3         |
| Moderate                                                                                                                | 571,437                   | 250,644               | 19.4                               | 43.9         | 270,664                                            | 47.4         | 50,129                    | 8.8          |
| Middle                                                                                                                  | 685,807                   | 383,994               | 29.7                               | 56.0         | 256,343                                            | 37.4         | 45,470                    | 6.6          |
| Upper                                                                                                                   | 832,452                   | 585,856               | 45.4                               | 70.4         | 201,381                                            | 24.2         | 45,215                    | 5.4          |
| Unknown                                                                                                                 | 4,922                     | 1,248                 | 0.1                                | 25.4         | 3,133                                              | 63.7         | 541                       | 11.0         |
| <b>Total AA</b>                                                                                                         | <b>2,378,283</b>          | <b>1,291,712</b>      | <b>100.0</b>                       | <b>54.3</b>  | <b>907,516</b>                                     | <b>38.2</b>  | <b>179,055</b>            | <b>7.5</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 30,039                    | 7.8                   | 27,021                             | 7.5          | 2,781                                              | 11.4         | 237                       | 5.4          |
| Moderate                                                                                                                | 74,142                    | 19.2                  | 67,463                             | 18.8         | 6,126                                              | 25.1         | 553                       | 12.5         |
| Middle                                                                                                                  | 103,498                   | 26.7                  | 96,355                             | 26.9         | 6,149                                              | 25.2         | 994                       | 22.5         |
| Upper                                                                                                                   | 176,923                   | 45.7                  | 165,523                            | 46.2         | 8,808                                              | 36.1         | 2,592                     | 58.7         |
| Unknown                                                                                                                 | 2,320                     | 0.6                   | 1,717                              | 0.5          | 567                                                | 2.3          | 36                        | 0.8          |
| <b>Total AA</b>                                                                                                         | <b>386,922</b>            | <b>100.0</b>          | <b>358,079</b>                     | <b>100.0</b> | <b>24,431</b>                                      | <b>100.0</b> | <b>4,412</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>92.5</b>  |                                                    | <b>6.3</b>   |                           | <b>1.1</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 103                       | 3.3                   | 99                                 | 3.3          | 4                                                  | 11.8         | 0                         | 0.0          |
| Moderate                                                                                                                | 333                       | 10.8                  | 328                                | 10.8         | 5                                                  | 14.7         | 0                         | 0.0          |
| Middle                                                                                                                  | 954                       | 31.0                  | 949                                | 31.2         | 5                                                  | 14.7         | 0                         | 0.0          |
| Upper                                                                                                                   | 1,679                     | 54.5                  | 1,657                              | 54.5         | 19                                                 | 55.9         | 3                         | 100.0        |
| Unknown                                                                                                                 | 9                         | 0.3                   | 8                                  | 0.3          | 1                                                  | 2.9          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>3,078</b>              | <b>100.0</b>          | <b>3,041</b>                       | <b>100.0</b> | <b>34</b>                                          | <b>100.0</b> | <b>3</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>98.8</b>  |                                                    | <b>1.1</b>   |                           | <b>0.1</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B16**

| 2020 Combined Demographics<br>Assessment Area: Dallas-Fort Worth Metropolitan                                           |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 165                       | 13.6                  | 150,315                            | 9.9          | 51,375                                             | 34.2         | 355,209                   | 23.4         |
| Moderate                                                                                                                | 313                       | 25.7                  | 348,387                            | 23.0         | 66,076                                             | 19.0         | 247,628                   | 16.3         |
| Middle                                                                                                                  | 324                       | 26.6                  | 437,370                            | 28.8         | 36,242                                             | 8.3          | 272,854                   | 18.0         |
| Upper                                                                                                                   | 408                       | 33.5                  | 578,925                            | 38.2         | 20,318                                             | 3.5          | 640,794                   | 42.3         |
| Unknown                                                                                                                 | 7                         | 0.6                   | 1,488                              | 0.1          | 273                                                | 18.3         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>1,217</b>              | <b>100.0</b>          | <b>1,516,485</b>                   | <b>100.0</b> | <b>174,284</b>                                     | <b>11.5</b>  | <b>1,516,485</b>          | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 283,665                   | 69,970                | 5.4                                | 24.7         | 175,995                                            | 62.0         | 37,700                    | 13.3         |
| Moderate                                                                                                                | 571,437                   | 250,644               | 19.4                               | 43.9         | 270,664                                            | 47.4         | 50,129                    | 8.8          |
| Middle                                                                                                                  | 685,807                   | 383,994               | 29.7                               | 56.0         | 256,343                                            | 37.4         | 45,470                    | 6.6          |
| Upper                                                                                                                   | 832,452                   | 585,856               | 45.4                               | 70.4         | 201,381                                            | 24.2         | 45,215                    | 5.4          |
| Unknown                                                                                                                 | 4,922                     | 1,248                 | 0.1                                | 25.4         | 3,133                                              | 63.7         | 541                       | 11.0         |
| <b>Total AA</b>                                                                                                         | <b>2,378,283</b>          | <b>1,291,712</b>      | <b>100.0</b>                       | <b>54.3</b>  | <b>907,516</b>                                     | <b>38.2</b>  | <b>179,055</b>            | <b>7.5</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 28,887                    | 7.6                   | 25,851                             | 7.4          | 2,832                                              | 11.4         | 204                       | 4.9          |
| Moderate                                                                                                                | 73,151                    | 19.3                  | 66,342                             | 19.0         | 6,305                                              | 25.3         | 504                       | 12.1         |
| Middle                                                                                                                  | 101,095                   | 26.7                  | 93,825                             | 26.8         | 6,336                                              | 25.4         | 934                       | 22.3         |
| Upper                                                                                                                   | 173,760                   | 45.8                  | 162,360                            | 46.4         | 8,892                                              | 35.7         | 2,508                     | 60.0         |
| Unknown                                                                                                                 | 2,234                     | 0.6                   | 1,630                              | 0.5          | 573                                                | 2.3          | 31                        | 0.7          |
| <b>Total AA</b>                                                                                                         | <b>379,127</b>            | <b>100.0</b>          | <b>350,008</b>                     | <b>100.0</b> | <b>24,938</b>                                      | <b>100.0</b> | <b>4,181</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>92.3</b>  |                                                    | <b>6.6</b>   |                           | <b>1.1</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 107                       | 3.4                   | 100                                | 3.2          | 7                                                  | 19.4         | 0                         | 0.0          |
| Moderate                                                                                                                | 334                       | 10.6                  | 326                                | 10.4         | 8                                                  | 22.2         | 0                         | 0.0          |
| Middle                                                                                                                  | 968                       | 30.6                  | 965                                | 30.9         | 3                                                  | 8.3          | 0                         | 0.0          |
| Upper                                                                                                                   | 1,747                     | 55.2                  | 1,727                              | 55.2         | 17                                                 | 47.2         | 3                         | 100.0        |
| Unknown                                                                                                                 | 9                         | 0.3                   | 8                                  | 0.3          | 1                                                  | 2.8          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>3,165</b>              | <b>100.0</b>          | <b>3,126</b>                       | <b>100.0</b> | <b>36</b>                                          | <b>100.0</b> | <b>3</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>98.8</b>  |                                                    | <b>1.1</b>   |                           | <b>0.1</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B17**

| 2021 Combined Demographics<br>Assessment Area: San Antonio Metropolitan                                                                                                                   |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 33                        | 8.9                   | 28,586                             | 6.7          | 10,764                                             | 37.7         | 102,399                   | 23.8         |
| Moderate                                                                                                                                                                                  | 131                       | 35.2                  | 135,059                            | 31.5         | 28,860                                             | 21.4         | 75,626                    | 17.6         |
| Middle                                                                                                                                                                                    | 94                        | 25.3                  | 117,189                            | 27.3         | 12,655                                             | 10.8         | 82,128                    | 19.1         |
| Upper                                                                                                                                                                                     | 110                       | 29.6                  | 148,558                            | 34.6         | 6,006                                              | 4.0          | 169,251                   | 39.4         |
| Unknown                                                                                                                                                                                   | 4                         | 1.1                   | 12                                 | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>372</b>                | <b>100.0</b>          | <b>429,404</b>                     | <b>100.0</b> | <b>58,285</b>                                      | <b>13.6</b>  | <b>429,404</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 47,834                    | 19,121                | 5.1                                | 40.0         | 22,334                                             | 46.7         | 6,379                     | 13.3         |
| Moderate                                                                                                                                                                                  | 229,217                   | 100,677               | 27.1                               | 43.9         | 105,396                                            | 46.0         | 23,144                    | 10.1         |
| Middle                                                                                                                                                                                    | 192,965                   | 101,728               | 27.4                               | 52.7         | 76,061                                             | 39.4         | 15,176                    | 7.9          |
| Upper                                                                                                                                                                                     | 219,934                   | 150,148               | 40.4                               | 68.3         | 56,906                                             | 25.9         | 12,880                    | 5.9          |
| Unknown                                                                                                                                                                                   | 12                        | 12                    | 0.0                                | 100.0        | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>689,962</b>            | <b>371,686</b>        | <b>100.0</b>                       | <b>53.9</b>  | <b>260,697</b>                                     | <b>37.8</b>  | <b>57,579</b>             | <b>8.3</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 4,198                     | 4.9                   | 3,709                              | 4.6          | 465                                                | 8.8          | 24                        | 3.0          |
| Moderate                                                                                                                                                                                  | 19,624                    | 22.8                  | 18,203                             | 22.7         | 1,310                                              | 24.9         | 111                       | 13.9         |
| Middle                                                                                                                                                                                    | 24,449                    | 28.4                  | 22,608                             | 28.2         | 1,664                                              | 31.6         | 177                       | 22.2         |
| Upper                                                                                                                                                                                     | 37,727                    | 43.8                  | 35,466                             | 44.3         | 1,779                                              | 33.8         | 482                       | 60.5         |
| Unknown                                                                                                                                                                                   | 193                       | 0.2                   | 147                                | 0.2          | 43                                                 | 0.8          | 3                         | 0.4          |
| <b>Total AA</b>                                                                                                                                                                           | <b>86,191</b>             | <b>100.0</b>          | <b>80,133</b>                      | <b>100.0</b> | <b>5,261</b>                                       | <b>100.0</b> | <b>797</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 93.0         |                                                    | 6.1          |                           | 0.9          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 13                        | 1.4                   | 12                                 | 1.3          | 1                                                  | 12.5         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 108                       | 11.5                  | 107                                | 11.5         | 1                                                  | 12.5         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 233                       | 24.9                  | 231                                | 24.9         | 2                                                  | 25.0         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 582                       | 62.2                  | 578                                | 62.3         | 4                                                  | 50.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>936</b>                | <b>100.0</b>          | <b>928</b>                         | <b>100.0</b> | <b>8</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 99.1         |                                                    | 0.9          |                           | 0.0          |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table B18**

| 2020 Combined Demographics<br>Assessment Area: San Antonio Metropolitan                                                                                                                   |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 33                        | 8.9                   | 28,586                             | 6.7          | 10,764                                             | 37.7         | 102,399                   | 23.8         |
| Moderate                                                                                                                                                                                  | 131                       | 35.2                  | 135,059                            | 31.5         | 28,860                                             | 21.4         | 75,626                    | 17.6         |
| Middle                                                                                                                                                                                    | 94                        | 25.3                  | 117,189                            | 27.3         | 12,655                                             | 10.8         | 82,128                    | 19.1         |
| Upper                                                                                                                                                                                     | 110                       | 29.6                  | 148,558                            | 34.6         | 6,006                                              | 4.0          | 169,251                   | 39.4         |
| Unknown                                                                                                                                                                                   | 4                         | 1.1                   | 12                                 | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>372</b>                | <b>100.0</b>          | <b>429,404</b>                     | <b>100.0</b> | <b>58,285</b>                                      | <b>13.6</b>  | <b>429,404</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 47,834                    | 19,121                | 5.1                                | 40.0         | 22,334                                             | 46.7         | 6,379                     | 13.3         |
| Moderate                                                                                                                                                                                  | 229,217                   | 100,677               | 27.1                               | 43.9         | 105,396                                            | 46.0         | 23,144                    | 10.1         |
| Middle                                                                                                                                                                                    | 192,965                   | 101,728               | 27.4                               | 52.7         | 76,061                                             | 39.4         | 15,176                    | 7.9          |
| Upper                                                                                                                                                                                     | 219,934                   | 150,148               | 40.4                               | 68.3         | 56,906                                             | 25.9         | 12,880                    | 5.9          |
| Unknown                                                                                                                                                                                   | 12                        | 12                    | 0.0                                | 100.0        | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>689,962</b>            | <b>371,686</b>        | <b>100.0</b>                       | <b>53.9</b>  | <b>260,697</b>                                     | <b>37.8</b>  | <b>57,579</b>             | <b>8.3</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 4,243                     | 5.0                   | 3,748                              | 4.7          | 475                                                | 8.8          | 20                        | 2.6          |
| Moderate                                                                                                                                                                                  | 19,421                    | 22.8                  | 17,985                             | 22.7         | 1,336                                              | 24.8         | 100                       | 13.2         |
| Middle                                                                                                                                                                                    | 24,242                    | 28.4                  | 22,351                             | 28.2         | 1,723                                              | 32.0         | 168                       | 22.1         |
| Upper                                                                                                                                                                                     | 37,237                    | 43.6                  | 34,964                             | 44.1         | 1,805                                              | 33.5         | 468                       | 61.7         |
| Unknown                                                                                                                                                                                   | 201                       | 0.2                   | 153                                | 0.2          | 45                                                 | 0.8          | 3                         | 0.4          |
| <b>Total AA</b>                                                                                                                                                                           | <b>85,344</b>             | <b>100.0</b>          | <b>79,201</b>                      | <b>100.0</b> | <b>5,384</b>                                       | <b>100.0</b> | <b>759</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>92.8</b>  |                                                    | <b>6.3</b>   |                           | <b>0.9</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 10                        | 1.1                   | 9                                  | 1.0          | 1                                                  | 14.3         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 110                       | 11.6                  | 109                                | 11.6         | 1                                                  | 14.3         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 229                       | 24.2                  | 228                                | 24.3         | 1                                                  | 14.3         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 596                       | 63.1                  | 592                                | 63.1         | 4                                                  | 57.1         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>945</b>                | <b>100.0</b>          | <b>938</b>                         | <b>100.0</b> | <b>7</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>99.3</b>  |                                                    | <b>0.7</b>   |                           | <b>0.0</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

APPENDIX C: FULL-SCOPE ASSESSMENT AREAS LENDING TABLES

Table C1A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Phoenix Metropolitan                                   |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 3.1   | 4.5   | 280     | 2.8   | 2.8   | 4.6                          |
| Moderate                                                                | 10                       | 31.3  | 16.4  | 2,267   | 22.5  | 11.7  | 18.8                         |
| Middle                                                                  | 13                       | 40.6  | 36.7  | 2,894   | 28.7  | 31.7  | 34.7                         |
| Upper                                                                   | 8                        | 25.0  | 41.6  | 4,643   | 46.0  | 52.7  | 41.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.9   | 0       | 0.0   | 1.0   | 0.0                          |
| Total                                                                   | 32                       | 100.0 | 100.0 | 10,084  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 4                        | 4.9   | 2.0   | 416     | 2.0   | 1.3   | 4.6                          |
| Moderate                                                                | 19                       | 23.5  | 11.3  | 4,039   | 19.2  | 8.1   | 18.8                         |
| Middle                                                                  | 15                       | 18.5  | 32.9  | 3,037   | 14.5  | 28.1  | 34.7                         |
| Upper                                                                   | 43                       | 53.1  | 53.2  | 13,524  | 64.4  | 61.8  | 41.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 0.0                          |
| Total                                                                   | 81                       | 100.0 | 100.0 | 21,016  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 1.2   | 2.0   | 39      | 0.3   | 1.5   | 4.6                          |
| Moderate                                                                | 3                        | 3.6   | 10.6  | 154     | 1.4   | 8.2   | 18.8                         |
| Middle                                                                  | 26                       | 31.0  | 30.7  | 2,978   | 26.5  | 25.1  | 34.7                         |
| Upper                                                                   | 54                       | 64.3  | 56.2  | 8,086   | 71.8  | 64.8  | 41.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 0.0                          |
| Total                                                                   | 84                       | 100.0 | 100.0 | 11,257  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 27.8  | 0       | 0.0   | 24.5  | 18.9                         |
| Moderate                                                                | 0                        | 0.0   | 34.6  | 0       | 0.0   | 22.8  | 30.7                         |
| Middle                                                                  | 0                        | 0.0   | 23.4  | 0       | 0.0   | 32.2  | 30.9                         |
| Upper                                                                   | 1                        | 100.0 | 13.2  | 26,900  | 100.0 | 20.3  | 19.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.9   | 0       | 0.0   | 0.2   | 0.5                          |
| Total                                                                   | 1                        | 100.0 | 100.0 | 26,900  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 7                        | 2.6   | 2.9   | 767     | 1.0   | 2.6   | 4.6                          |
| Moderate                                                                | 38                       | 13.9  | 13.0  | 7,286   | 9.1   | 9.8   | 18.8                         |
| Middle                                                                  | 75                       | 27.4  | 34.1  | 10,314  | 12.9  | 29.4  | 34.7                         |
| Upper                                                                   | 153                      | 55.8  | 49.3  | 61,439  | 76.9  | 57.5  | 41.9                         |
| Unknown                                                                 | 1                        | 0.4   | 0.7   | 125     | 0.2   | 0.8   | 0.0                          |
| Total                                                                   | 274                      | 100.0 | 100.0 | 79,931  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table C1B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Phoenix Metropolitan                                            |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income Level                                                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | ##%   | ##%   | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 1                        | 1.3   | 1.6   | 32      | 0.3   | 0.8   | 4.6                          |
| Moderate                                                                                                                                                    | 6                        | 8.0   | 8.9   | 826     | 8.6   | 4.6   | 18.8                         |
| Middle                                                                                                                                                      | 21                       | 28.0  | 28.0  | 1,405   | 14.7  | 19.0  | 34.7                         |
| Upper                                                                                                                                                       | 46                       | 61.3  | 61.1  | 7,186   | 75.1  | 75.3  | 41.9                         |
| Unknown                                                                                                                                                     | 1                        | 1.3   | 0.5   | 125     | 1.3   | 0.2   | 0.0                          |
| Total                                                                                                                                                       | 75                       | 100.0 | 100.0 | 9,574   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.2   | 0       | 0.0   | 0.9   | 4.6                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 11.3  | 0       | 0.0   | 5.5   | 18.8                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 30.8  | 0       | 0.0   | 17.5  | 34.7                         |
| Upper                                                                                                                                                       | 1                        | 100.0 | 55.4  | 1,100   | 100.0 | 76.0  | 41.9                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 0.0                          |
| Total                                                                                                                                                       | 1                        | 100.0 | 100.0 | 1,100   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 5.9   | 0       | 0.0   | 3.7   | 4.6                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 21.0  | 0       | 0.0   | 15.9  | 18.8                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 42.5  | 0       | 0.0   | 37.7  | 34.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 30.4  | 0       | 0.0   | 42.4  | 41.9                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.4   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table C2**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Phoenix Metropolitan |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                     | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                   | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                   | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                               | 39                       | 9.8   | 6.7   | 5,075   | 9.9   | 10.2  | 6.6                      |
| Moderate                                                                                                          | 85                       | 21.4  | 16.6  | 11,411  | 22.3  | 19.1  | 16.7                     |
| Middle                                                                                                            | 117                      | 29.4  | 26.4  | 16,608  | 32.5  | 24.6  | 28.4                     |
| Upper                                                                                                             | 154                      | 38.7  | 49.1  | 17,658  | 34.6  | 44.3  | 47.7                     |
| Unknown                                                                                                           | 3                        | 0.8   | 0.7   | 352     | 0.7   | 1.3   | 0.6                      |
| Total                                                                                                             | 398                      | 100.0 | 100.0 | 51,104  | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table C3A**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Phoenix Metropolitan |                          |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                     | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 2                        | 6.3   | 4.5   | 382     | 3.8   | 2.5   | 21.8                              |
| Moderate                                                                                                     | 15                       | 46.9  | 19.8  | 3,433   | 34.0  | 14.3  | 16.9                              |
| Middle                                                                                                       | 4                        | 12.5  | 21.4  | 872     | 8.6   | 19.1  | 19.2                              |
| Upper                                                                                                        | 10                       | 31.3  | 40.9  | 5,117   | 50.7  | 51.2  | 42.2                              |
| Unknown                                                                                                      | 1                        | 3.1   | 13.4  | 280     | 2.8   | 12.9  | 0.0                               |
| Total                                                                                                        | 32                       | 100.0 | 100.0 | 10,084  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 8                        | 9.9   | 4.6   | 1,080   | 5.1   | 2.6   | 21.8                              |
| Moderate                                                                                                     | 19                       | 23.5  | 14.8  | 3,603   | 17.1  | 10.6  | 16.9                              |
| Middle                                                                                                       | 17                       | 21.0  | 20.1  | 3,240   | 15.4  | 17.7  | 19.2                              |
| Upper                                                                                                        | 32                       | 39.5  | 40.7  | 11,574  | 55.1  | 48.8  | 42.2                              |
| Unknown                                                                                                      | 5                        | 6.2   | 19.7  | 1,519   | 7.2   | 20.4  | 0.0                               |
| Total                                                                                                        | 81                       | 100.0 | 100.0 | 21,016  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 2                        | 2.4   | 4.8   | 95      | 0.8   | 3.0   | 21.8                              |
| Moderate                                                                                                     | 8                        | 9.5   | 13.7  | 600     | 5.3   | 11.0  | 16.9                              |
| Middle                                                                                                       | 16                       | 19.0  | 21.9  | 1,178   | 10.5  | 18.9  | 19.2                              |
| Upper                                                                                                        | 56                       | 66.7  | 56.0  | 9,134   | 81.1  | 61.3  | 42.2                              |
| Unknown                                                                                                      | 2                        | 2.4   | 3.7   | 250     | 2.2   | 5.8   | 0.0                               |
| Total                                                                                                        | 84                       | 100.0 | 100.0 | 11,257  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 16                       | 5.9   | 4.6   | 1,890   | 3.6   | 2.5   | 21.8                              |
| Moderate                                                                                                     | 51                       | 18.7  | 16.1  | 8,130   | 15.3  | 11.8  | 16.9                              |
| Middle                                                                                                       | 51                       | 18.7  | 20.3  | 6,342   | 12.0  | 18.0  | 19.2                              |
| Upper                                                                                                        | 146                      | 53.5  | 40.8  | 34,370  | 64.8  | 49.5  | 42.2                              |
| Unknown                                                                                                      | 9                        | 3.3   | 18.2  | 2,299   | 4.3   | 18.2  | 0.0                               |
| Total                                                                                                        | 273                      | 100.0 | 100.0 | 53,031  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                               |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                      |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                    |                          |       |       |         |       |       |                                   |



**Table C3B**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Phoenix Metropolitan |                          |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                     | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                        | ##    | ##    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 4                        | 5.3   | 4.9   | 333     | 3.5   | 2.5   | 21.8                              |
| Moderate                                                                                                     | 9                        | 12.0  | 12.5  | 494     | 5.2   | 7.7   | 16.9                              |
| Middle                                                                                                       | 14                       | 18.7  | 17.6  | 1,052   | 11.0  | 11.6  | 19.2                              |
| Upper                                                                                                        | 47                       | 62.7  | 60.9  | 7,445   | 77.8  | 73.2  | 42.2                              |
| Unknown                                                                                                      | 1                        | 1.3   | 4.1   | 250     | 2.6   | 5.0   | 0.0                               |
| Total                                                                                                        | 75                       | 100.0 | 100.0 | 9,574   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                  |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                        | 0.0   | 7.2   | 0       | 0.0   | 3.5   | 21.8                              |
| Moderate                                                                                                     | 0                        | 0.0   | 13.9  | 0       | 0.0   | 7.3   | 16.9                              |
| Middle                                                                                                       | 0                        | 0.0   | 18.5  | 0       | 0.0   | 10.2  | 19.2                              |
| Upper                                                                                                        | 1                        | 100.0 | 52.3  | 1,100   | 100.0 | 69.7  | 42.2                              |
| Unknown                                                                                                      | 0                        | 0.0   | 8.0   | 0       | 0.0   | 9.2   | 0.0                               |
| Total                                                                                                        | 1                        | 100.0 | 100.0 | 1,100   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 21.8                              |
| Moderate                                                                                                     | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.6   | 16.9                              |
| Middle                                                                                                       | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.6   | 19.2                              |
| Upper                                                                                                        | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.4   | 42.2                              |
| Unknown                                                                                                      | 0                        | 0.0   | 98.1  | 0       | 0.0   | 98.1  | 0.0                               |
| Total                                                                                                        | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                               |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                      |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                          |       |       |         |       |       |                                   |

**Table C4**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Phoenix Metropolitan                                                                                   |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | %     | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 241                      | 60.6  | 40.1  | 19,496  | 38.1  | 21.9  | 93.2                     |
| Over \$1 Million                                                                                                        | 96                       | 24.1  |       | 25,488  | 49.9  |       | 5.6                      |
| Revenue Unknown                                                                                                         | 61                       | 15.3  |       | 6,120   | 12.0  |       | 1.2                      |
| Total                                                                                                                   | 398                      | 100.0 |       | 51,104  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 269                      | 67.6  | 88.8  | 8,835   | 17.3  | 34.5  |                          |
| \$100,001 - \$250,000                                                                                                   | 67                       | 16.8  | 6.4   | 11,527  | 22.6  | 19.5  |                          |
| \$250,001 - \$1 Million                                                                                                 | 62                       | 15.6  | 4.8   | 30,742  | 60.2  | 46.0  |                          |
| Total                                                                                                                   | 398                      | 100.0 | 100.0 | 51,104  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 195                      | 80.9  |       | 5,780   | 29.6  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 27                       | 11.2  |       | 4,081   | 20.9  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 19                       | 7.9   |       | 9,635   | 49.4  |       |                          |
| Total                                                                                                                   | 241                      | 100.0 |       | 19,496  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

Table C5A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Greater Los Angeles MSA |                          |       |       |         |       |       |                              |
|---------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                       | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                     | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                 | 1                        | 1.9   | 2.7   | 381     | 0.8   | 1.9   | 2.7                          |
| Moderate                                                                                                            | 9                        | 17.3  | 16.4  | 2,842   | 5.8   | 11.4  | 17.6                         |
| Middle                                                                                                              | 8                        | 15.4  | 26.8  | 3,192   | 6.5   | 21.4  | 27.5                         |
| Upper                                                                                                               | 34                       | 65.4  | 53.0  | 42,806  | 87.0  | 64.1  | 52.2                         |
| Unknown                                                                                                             | 0                        | 0.0   | 1.1   | 0       | 0.0   | 1.2   | 0.1                          |
| Total                                                                                                               | 52                       | 100.0 | 100.0 | 49,221  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                     |                          |       |       |         |       |       |                              |
| Low                                                                                                                 | 4                        | 1.4   | 2.0   | 1,381   | 0.6   | 1.6   | 2.7                          |
| Moderate                                                                                                            | 57                       | 20.4  | 14.4  | 15,300  | 6.4   | 11.2  | 17.6                         |
| Middle                                                                                                              | 47                       | 16.8  | 27.2  | 16,369  | 6.8   | 23.2  | 27.5                         |
| Upper                                                                                                               | 170                      | 60.9  | 56.2  | 204,477 | 85.5  | 63.7  | 52.2                         |
| Unknown                                                                                                             | 1                        | 0.4   | 0.3   | 1,500   | 0.6   | 0.4   | 0.1                          |
| Total                                                                                                               | 279                      | 100.0 | 100.0 | 239,027 | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                              |                          |       |       |         |       |       |                              |
| Low                                                                                                                 | 2                        | 0.6   | 1.4   | 365     | 0.5   | 1.3   | 2.7                          |
| Moderate                                                                                                            | 31                       | 8.6   | 11.6  | 5,882   | 8.2   | 9.7   | 17.6                         |
| Middle                                                                                                              | 82                       | 22.8  | 23.6  | 14,744  | 20.5  | 20.4  | 27.5                         |
| Upper                                                                                                               | 243                      | 67.7  | 63.3  | 50,749  | 70.4  | 68.5  | 52.2                         |
| Unknown                                                                                                             | 1                        | 0.3   | 0.2   | 302     | 0.4   | 0.1   | 0.1                          |
| Total                                                                                                               | 359                      | 100.0 | 100.0 | 72,042  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                   |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                 | 0                        | 0.0   | 15.6  | 0       | 0.0   | 11.3  |                              |
| Moderate                                                                                                            | 1                        | 50.0  | 35.8  | 2,050   | 47.6  | 31.9  | 31.2                         |
| Middle                                                                                                              | 0                        | 0.0   | 23.3  | 0       | 0.0   | 24.9  | 23.6                         |
| Upper                                                                                                               | 1                        | 50.0  | 24.8  | 2,261   | 52.4  | 31.0  | 31.6                         |
| Unknown                                                                                                             | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.8   | 1.2                          |
| Total                                                                                                               | 2                        | 100.0 | 100.0 | 4,311   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                           |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                 | 9                        | 0.9   | 2.2   | 2,273   | 0.5   | 2.2   |                              |
| Moderate                                                                                                            | 113                      | 11.5  | 14.8  | 28,664  | 5.8   | 12.2  | 17.6                         |
| Middle                                                                                                              | 187                      | 19.0  | 26.9  | 43,374  | 8.8   | 22.7  | 27.5                         |
| Upper                                                                                                               | 671                      | 68.2  | 55.7  | 418,705 | 84.6  | 62.4  | 52.2                         |
| Unknown                                                                                                             | 4                        | 0.4   | 0.4   | 2,150   | 0.4   | 0.5   | 0.1                          |
| Total                                                                                                               | 984                      | 100.0 | 100.0 | 495,166 | 100.0 | 100.0 | 100.0                        |

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C5B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Greater Los Angeles MSA |                          |       |       |         |       |       |                              |
|---------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                       | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                     | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                       |                          |       |       |         |       |       |                              |
| Low                                                                                                                 | 2                        | 0.7   | 0.9   | 146     | 0.2   | 0.5   | 2.7                          |
| Moderate                                                                                                            | 15                       | 5.4   | 8.4   | 2,590   | 3.9   | 5.3   | 17.6                         |
| Middle                                                                                                              | 49                       | 17.6  | 19.9  | 8,581   | 12.9  | 12.9  | 27.5                         |
| Upper                                                                                                               | 210                      | 75.5  | 70.5  | 54,615  | 82.4  | 81.0  | 52.2                         |
| Unknown                                                                                                             | 2                        | 0.7   | 0.3   | 348     | 0.5   | 0.3   | 0.1                          |
| Total                                                                                                               | 278                      | 100.0 | 100.0 | 66,280  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                         |                          |       |       |         |       |       |                              |
| Low                                                                                                                 | 0                        | 0.0   | 1.5   | 0       | 0.0   | 0.6   | 2.7                          |
| Moderate                                                                                                            | 0                        | 0.0   | 11.2  | 0       | 0.0   | 3.7   | 17.6                         |
| Middle                                                                                                              | 1                        | 7.1   | 22.2  | 488     | 0.8   | 8.4   | 27.5                         |
| Upper                                                                                                               | 13                       | 92.9  | 64.8  | 63,797  | 99.2  | 87.1  | 52.2                         |
| Unknown                                                                                                             | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                               | 14                       | 100.0 | 100.0 | 64,285  | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                              |                          |       |       |         |       |       |                              |
| Low                                                                                                                 | 0                        | 0.0   | 5.2   | 0       | 0.0   | 3.5   | 2.7                          |
| Moderate                                                                                                            | 0                        | 0.0   | 25.8  | 0       | 0.0   | 17.7  | 17.6                         |
| Middle                                                                                                              | 0                        | 0.0   | 31.5  | 0       | 0.0   | 27.0  | 27.5                         |
| Upper                                                                                                               | 0                        | 0.0   | 37.3  | 0       | 0.0   | 51.4  | 52.2                         |
| Unknown                                                                                                             | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.4   | 0.1                          |
| Total                                                                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                      |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                             |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                      |                          |       |       |         |       |       |                              |

**Table C6**

Table 30

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Greater Los Angeles MSA |                          |       |       |         |       |       |                          |
|----------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                        | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                      | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                      | #                        | #%    | #%    | \$(000) | %     | \$%   |                          |
| Low                                                                                                                  | 86                       | 5.6   | 5.1   | 15,575  | 5.8   | 5.1   | 5.1                      |
| Moderate                                                                                                             | 227                      | 14.8  | 19.3  | 46,434  | 17.3  | 20.1  | 19.7                     |
| Middle                                                                                                               | 356                      | 23.3  | 25.1  | 81,195  | 30.2  | 27.6  | 25.5                     |
| Upper                                                                                                                | 813                      | 53.1  | 48.4  | 117,966 | 43.9  | 44.0  | 48.0                     |
| Unknown                                                                                                              | 49                       | 3.2   | 1.7   | 7,443   | 2.8   | 2.8   | 1.8                      |
| Total                                                                                                                | 1,531                    | 100.0 | 100.0 | 268,613 | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C7A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Greater Los Angeles MSA |                          |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                     | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                 | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                 | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                             |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 1                        | 1.9   | 1.4   | 155     | 0.3   | 0.8   | 24.4                              |
| Moderate                                                                                                        | 3                        | 5.8   | 5.3   | 911     | 1.9   | 2.5   | 16.3                              |
| Middle                                                                                                          | 3                        | 5.8   | 15.5  | 959     | 1.9   | 10.0  | 17.0                              |
| Upper                                                                                                           | 43                       | 82.7  | 65.6  | 36,646  | 74.5  | 74.2  | 42.3                              |
| Unknown                                                                                                         | 2                        | 3.8   | 12.2  | 10,550  | 21.4  | 12.5  | 0.0                               |
| Total                                                                                                           | 52                       | 100.0 | 100.0 | 49,221  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 5                        | 1.8   | 2.9   | 4,381   | 1.8   | 1.9   | 24.4                              |
| Moderate                                                                                                        | 12                       | 4.3   | 7.8   | 2,565   | 1.1   | 4.8   | 16.3                              |
| Middle                                                                                                          | 39                       | 14.0  | 18.1  | 14,565  | 6.1   | 14.0  | 17.0                              |
| Upper                                                                                                           | 201                      | 72.0  | 56.4  | 145,172 | 60.7  | 63.7  | 42.3                              |
| Unknown                                                                                                         | 22                       | 7.9   | 14.8  | 72,344  | 30.3  | 15.6  | 0.0                               |
| Total                                                                                                           | 279                      | 100.0 | 100.0 | 239,027 | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 1                        | 0.3   | 2.6   | 94      | 0.1   | 2.0   | 24.4                              |
| Moderate                                                                                                        | 9                        | 2.5   | 6.7   | 1,009   | 1.4   | 4.8   | 16.3                              |
| Middle                                                                                                          | 31                       | 8.6   | 15.5  | 4,160   | 5.8   | 13.1  | 17.0                              |
| Upper                                                                                                           | 317                      | 88.3  | 68.8  | 66,659  | 92.5  | 68.8  | 42.3                              |
| Unknown                                                                                                         | 1                        | 0.3   | 6.4   | 120     | 0.2   | 11.4  | 0.0                               |
| Total                                                                                                           | 359                      | 100.0 | 100.0 | 72,042  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 9                        | 0.9   | 2.6   | 4,780   | 1.0   | 1.7   | 24.4                              |
| Moderate                                                                                                        | 33                       | 3.4   | 7.3   | 6,158   | 1.3   | 4.2   | 16.3                              |
| Middle                                                                                                          | 96                       | 9.8   | 17.4  | 22,940  | 4.7   | 12.9  | 17.0                              |
| Upper                                                                                                           | 811                      | 82.6  | 58.0  | 366,974 | 74.8  | 65.8  | 42.3                              |
| Unknown                                                                                                         | 33                       | 3.4   | 14.7  | 90,003  | 18.3  | 15.4  | 0.0                               |
| Total                                                                                                           | 982                      | 100.0 | 100.0 | 490,855 | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                  |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                         |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                       |                          |       |       |         |       |       |                                   |

**Table C7B**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Greater Los Angeles MSA |                          |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                     | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                 | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                 | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 2                        | 0.7   | 3.5   | 150     | 0.2   | 2.6   | 24.4                              |
| Moderate                                                                                                        | 7                        | 2.5   | 5.2   | 1,163   | 1.8   | 2.8   | 16.3                              |
| Middle                                                                                                          | 23                       | 8.3   | 12.1  | 3,256   | 4.9   | 6.4   | 17.0                              |
| Upper                                                                                                           | 238                      | 85.6  | 74.1  | 54,722  | 82.6  | 78.2  | 42.3                              |
| Unknown                                                                                                         | 8                        | 2.9   | 5.0   | 6,989   | 10.5  | 10.0  | 0.0                               |
| Total                                                                                                           | 278                      | 100.0 | 100.0 | 66,280  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 0                        | 0.0   | 3.3   | 0       | 0.0   | 1.7   | 24.4                              |
| Moderate                                                                                                        | 2                        | 14.3  | 7.9   | 510     | 0.8   | 2.5   | 16.3                              |
| Middle                                                                                                          | 0                        | 0.0   | 13.3  | 0       | 0.0   | 4.6   | 17.0                              |
| Upper                                                                                                           | 12                       | 85.7  | 64.9  | 63,775  | 99.2  | 69.6  | 42.3                              |
| Unknown                                                                                                         | 0                        | 0.0   | 10.5  | 0       | 0.0   | 21.7  | 0.0                               |
| Total                                                                                                           | 14                       | 100.0 | 100.0 | 64,285  | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                             | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 24.4                              |
| Moderate                                                                                                        | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 16.3                              |
| Middle                                                                                                          | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 17.0                              |
| Upper                                                                                                           | 0                        | 0.0   | 2.0   | 0       | 0.0   | 3.3   | 42.3                              |
| Unknown                                                                                                         | 0                        | 0.0   | 96.8  | 0       | 0.0   | 95.9  | 0.0                               |
| Total                                                                                                           | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                  |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                         |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                          |       |       |         |       |       |                                   |

**Table C8**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Greater Los Angeles MSA                                  |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 713                      | 46.6  | 41.7  | 72,761  | 27.1  | 24.1  | 91.6                     |
| Over \$1 Million                                                          | 483                      | 31.5  |       | 152,934 | 56.9  |       | 7.9                      |
| Revenue Unknown                                                           | 335                      | 21.9  |       | 42,918  | 16.0  |       | 0.5                      |
| Total                                                                     | 1,531                    | 100.0 |       | 268,613 | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 921                      | 60.2  | 90.1  | 35,183  | 13.1  | 38.1  |                          |
| \$100,001 - \$250,000                                                     | 296                      | 19.3  | 5.8   | 52,642  | 19.6  | 19.4  |                          |
| \$250,001 - \$1 Million                                                   | 314                      | 20.5  | 4.0   | 180,788 | 67.3  | 42.5  |                          |
| Total                                                                     | 1,531                    | 100.0 | 100.0 | 268,613 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 545                      | 76.4  |       | 19,688  | 27.1  |       |                          |
| \$100,001 - \$250,000                                                     | 107                      | 15.0  |       | 17,498  | 24.0  |       |                          |
| \$250,001 - \$1 Million                                                   | 61                       | 8.6   |       | 35,575  | 48.9  |       |                          |
| Total                                                                     | 713                      | 100.0 |       | 72,761  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table C9A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Salinas MSA                                            |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 0.6                          |
| Moderate                                                                | 0                        | 0.0   | 14.9  | 0       | 0.0   | 10.1  | 15.3                         |
| Middle                                                                  | 1                        | 20.0  | 36.3  | 272     | 17.8  | 28.6  | 33.9                         |
| Upper                                                                   | 4                        | 80.0  | 48.3  | 1,259   | 82.2  | 61.0  | 50.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.0                          |
| Total                                                                   | 5                        | 100.0 | 100.0 | 1,531   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 0.6                          |
| Moderate                                                                | 0                        | 0.0   | 12.5  | 0       | 0.0   | 9.5   | 15.3                         |
| Middle                                                                  | 4                        | 30.8  | 35.6  | 773     | 19.3  | 30.8  | 33.9                         |
| Upper                                                                   | 9                        | 69.2  | 51.4  | 3,227   | 80.7  | 59.3  | 50.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 13                       | 100.0 | 100.0 | 4,000   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.7   | 0       | 0.0   | 1.1   | 0.6                          |
| Moderate                                                                | 3                        | 15.8  | 10.5  | 293     | 8.9   | 7.2   | 15.3                         |
| Middle                                                                  | 4                        | 21.1  | 29.4  | 640     | 19.4  | 21.1  | 33.9                         |
| Upper                                                                   | 12                       | 63.2  | 59.5  | 2,361   | 71.7  | 70.6  | 50.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 19                       | 100.0 | 100.0 | 3,294   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 15.7  | 0       | 0.0   | 4.7   | 5.5                          |
| Moderate                                                                | 0                        | 0.0   | 21.6  | 0       | 0.0   | 30.0  | 27.9                         |
| Middle                                                                  | 0                        | 0.0   | 31.4  | 0       | 0.0   | 31.9  | 36.1                         |
| Upper                                                                   | 0                        | 0.0   | 31.4  | 0       | 0.0   | 33.4  | 30.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.4   | 0.6                          |
| Moderate                                                                | 4                        | 8.9   | 13.0  | 425     | 4.2   | 9.9   | 15.3                         |
| Middle                                                                  | 12                       | 26.7  | 35.4  | 1,995   | 19.9  | 29.8  | 33.9                         |
| Upper                                                                   | 29                       | 64.4  | 51.0  | 7,581   | 75.8  | 59.8  | 50.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.1   | 0.0                          |
| Total                                                                   | 45                       | 100.0 | 100.0 | 10,001  | 100.0 | 100.0 | 100.0                        |

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.



Table C9B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Salinas MSA                                                     |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.6                          |
| Moderate                                                                                                                                                    | 1                        | 12.5  | 6.8   | 132     | 11.2  | 3.2   | 15.3                         |
| Middle                                                                                                                                                      | 3                        | 37.5  | 22.0  | 310     | 26.4  | 12.7  | 33.9                         |
| Upper                                                                                                                                                       | 4                        | 50.0  | 71.2  | 734     | 62.4  | 84.1  | 50.2                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 8                        | 100.0 | 100.0 | 1,176   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.1   | 0.6                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 13.5  | 0       | 0.0   | 4.1   | 15.3                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 23.0  | 0       | 0.0   | 11.1  | 33.9                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 63.0  | 0       | 0.0   | 84.8  | 50.2                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 0.6                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 23.3  | 0       | 0.0   | 12.4  | 15.3                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 39.9  | 0       | 0.0   | 34.3  | 33.9                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 36.3  | 0       | 0.0   | 53.0  | 50.2                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table C10**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Salinas MSA                                                                                  |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 6                        | 8.0   | 3.2   | 198     | 2.6   | 2.4   | 3.8                      |
| Moderate                                                                                                                                                                                  | 10                       | 13.3  | 12.6  | 1,536   | 20.0  | 11.7  | 12.5                     |
| Middle                                                                                                                                                                                    | 20                       | 26.7  | 30.2  | 2,268   | 29.5  | 34.0  | 30.4                     |
| Upper                                                                                                                                                                                     | 39                       | 52.0  | 50.9  | 3,696   | 48.0  | 48.6  | 52.9                     |
| Unknown                                                                                                                                                                                   | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.5   | 0.4                      |
| Total                                                                                                                                                                                     | 75                       | 100.0 | 100.0 | 7,698   | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

**Table C11A**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Salinas MSA |                          |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                     | #                        | ##%   | ##%   | \$(000) | ##%   | ##%   |                                   |
| Home Purchase Loans                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.3   | 21.6                              |
| Moderate                                                                                            | 0                        | 0.0   | 4.8   | 0       | 0.0   | 2.4   | 17.9                              |
| Middle                                                                                              | 1                        | 20.0  | 18.2  | 272     | 17.8  | 12.0  | 18.7                              |
| Upper                                                                                               | 3                        | 60.0  | 66.7  | 996     | 65.1  | 75.5  | 41.9                              |
| Unknown                                                                                             | 1                        | 20.0  | 9.7   | 263     | 17.2  | 9.8   | 0.0                               |
| Total                                                                                               | 5                        | 100.0 | 100.0 | 1,531   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 0                        | 0.0   | 2.2   | 0       | 0.0   | 1.4   | 21.6                              |
| Moderate                                                                                            | 2                        | 15.4  | 9.2   | 392     | 9.8   | 5.7   | 17.9                              |
| Middle                                                                                              | 1                        | 7.7   | 19.0  | 175     | 4.4   | 14.9  | 18.7                              |
| Upper                                                                                               | 9                        | 69.2  | 54.0  | 3,073   | 76.8  | 61.1  | 41.9                              |
| Unknown                                                                                             | 1                        | 7.7   | 15.6  | 360     | 9.0   | 17.0  | 0.0                               |
| Total                                                                                               | 13                       | 100.0 | 100.0 | 4,000   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 0                        | 0.0   | 2.3   | 0       | 0.0   | 1.0   | 21.6                              |
| Moderate                                                                                            | 4                        | 21.1  | 6.2   | 623     | 18.9  | 4.1   | 17.9                              |
| Middle                                                                                              | 3                        | 15.8  | 18.0  | 464     | 14.1  | 16.0  | 18.7                              |
| Upper                                                                                               | 12                       | 63.2  | 70.3  | 2,207   | 67.0  | 75.8  | 41.9                              |
| Unknown                                                                                             | 0                        | 0.0   | 3.3   | 0       | 0.0   | 3.1   | 0.0                               |
| Total                                                                                               | 19                       | 100.0 | 100.0 | 3,294   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 0                        | 0.0   | 1.9   | 0       | 0.0   | 1.1   | 21.6                              |
| Moderate                                                                                            | 8                        | 17.8  | 8.1   | 1,291   | 12.9  | 4.7   | 17.9                              |
| Middle                                                                                              | 5                        | 11.1  | 18.5  | 911     | 9.1   | 13.8  | 18.7                              |
| Upper                                                                                               | 30                       | 66.7  | 56.5  | 7,176   | 71.8  | 64.7  | 41.9                              |
| Unknown                                                                                             | 2                        | 4.4   | 14.9  | 623     | 6.2   | 15.6  | 0.0                               |
| Total                                                                                               | 45                       | 100.0 | 100.0 | 10,001  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                      |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                           |                          |       |       |         |       |       |                                   |

Table C11B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Salinas MSA                                                         |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.5   | 0       | 0.0   | 6.1   | 21.6                              |
| Moderate                                                                                                                                                    | 2                        | 25.0  | 5.1   | 276     | 23.5  | 5.4   | 17.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 16.4  | 0       | 0.0   | 7.1   | 18.7                              |
| Upper                                                                                                                                                       | 6                        | 75.0  | 70.1  | 900     | 76.5  | 68.7  | 41.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 4.0   | 0       | 0.0   | 12.7  | 0.0                               |
| Total                                                                                                                                                       | 8                        | 100.0 | 100.0 | 1,176   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.5   | 0       | 0.0   | 1.5   | 21.6                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 6.0   | 0       | 0.0   | 2.1   | 17.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 13.0  | 0       | 0.0   | 3.8   | 18.7                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 69.0  | 0       | 0.0   | 75.9  | 41.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 8.5   | 0       | 0.0   | 16.7  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.6                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 17.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.7                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 2.1   | 0       | 0.0   | 6.6   | 41.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 97.4  | 0       | 0.0   | 93.0  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table C12**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Salinas MSA                                              |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 41                       | 54.7  | 38.3  | 2,567   | 33.3  | 26.8  | 92.5                     |
| Over \$1 Million                                                          | 16                       | 21.3  |       | 4,841   | 62.9  |       | 7.0                      |
| Revenue Unknown                                                           | 18                       | 24.0  |       | 290     | 3.8   |       | 0.5                      |
| Total                                                                     | 75                       | 100.0 |       | 7,698   | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 60                       | 80.0  | 91.4  | 1,792   | 23.3  | 45.6  |                          |
| \$100,001 - \$250,000                                                     | 8                        | 10.7  | 5.8   | 1,426   | 18.5  | 20.6  |                          |
| \$250,001 - \$1 Million                                                   | 7                        | 9.3   | 2.8   | 4,480   | 58.2  | 33.8  |                          |
| Total                                                                     | 75                       | 100.0 | 100.0 | 7,698   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 36                       | 87.8  |       | 1,077   | 42.0  |       |                          |
| \$100,001 - \$250,000                                                     | 4                        | 9.8   |       | 660     | 25.7  |       |                          |
| \$250,001 - \$1 Million                                                   | 1                        | 2.4   |       | 830     | 32.3  |       |                          |
| Total                                                                     | 41                       | 100.0 |       | 2,567   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table C13A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Jose Metropolitan                                  |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.5   | 0       | 0.0   | 2.8   | 4.4                          |
| Moderate                                                                | 2                        | 18.2  | 17.1  | 938     | 18.5  | 11.8  | 15.5                         |
| Middle                                                                  | 4                        | 36.4  | 43.2  | 1,595   | 31.4  | 36.9  | 36.7                         |
| Upper                                                                   | 5                        | 45.5  | 35.2  | 2,540   | 50.1  | 48.4  | 43.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 11                       | 100.0 | 100.0 | 5,073   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.0   | 0       | 0.0   | 3.2   | 4.4                          |
| Moderate                                                                | 6                        | 8.5   | 15.9  | 2,226   | 4.5   | 12.9  | 15.5                         |
| Middle                                                                  | 23                       | 32.4  | 40.1  | 9,146   | 18.6  | 37.2  | 36.7                         |
| Upper                                                                   | 42                       | 59.2  | 40.0  | 37,789  | 76.9  | 46.7  | 43.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 71                       | 100.0 | 100.0 | 49,161  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 3                        | 3.7   | 3.2   | 270     | 1.2   | 2.6   | 4.4                          |
| Moderate                                                                | 13                       | 16.0  | 12.4  | 3,090   | 13.2  | 9.5   | 15.5                         |
| Middle                                                                  | 24                       | 29.6  | 37.0  | 6,339   | 27.1  | 32.1  | 36.7                         |
| Upper                                                                   | 41                       | 50.6  | 47.4  | 13,661  | 58.5  | 55.8  | 43.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 81                       | 100.0 | 100.0 | 23,360  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 22.1  | 0       | 0.0   | 17.3  |                              |
| Moderate                                                                | 1                        | 100.0 | 21.1  | 26,000  | 100.0 | 11.4  | 22.7                         |
| Middle                                                                  | 0                        | 0.0   | 37.9  | 0       | 0.0   | 34.9  | 41.9                         |
| Upper                                                                   | 0                        | 0.0   | 18.8  | 0       | 0.0   | 36.3  | 23.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 1                        | 100.0 | 100.0 | 26,000  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 5                        | 2.2   | 4.1   | 620     | 0.5   | 3.6   |                              |
| Moderate                                                                | 28                       | 12.2  | 15.9  | 34,152  | 27.9  | 12.5  | 15.5                         |
| Middle                                                                  | 70                       | 30.6  | 40.3  | 21,534  | 17.6  | 36.8  | 36.7                         |
| Upper                                                                   | 126                      | 55.0  | 39.7  | 65,944  | 53.9  | 47.1  | 43.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 229                      | 100.0 | 100.0 | 122,250 | 100.0 | 100.0 | 100.0                        |

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C13B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Jose Metropolitan                                           |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 2                        | 3.1   | 2.2   | 350     | 1.9   | 1.5   | 4.4                          |
| Moderate                                                                                                                                                    | 6                        | 9.2   | 10.1  | 1,898   | 10.2  | 6.6   | 15.5                         |
| Middle                                                                                                                                                      | 19                       | 29.2  | 34.2  | 4,454   | 23.9  | 27.9  | 36.7                         |
| Upper                                                                                                                                                       | 38                       | 58.5  | 53.5  | 11,954  | 64.1  | 64.0  | 43.5                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 65                       | 100.0 | 100.0 | 18,656  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.1   | 0       | 0.0   | 2.3   | 4.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 13.9  | 0       | 0.0   | 7.9   | 15.5                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 37.3  | 0       | 0.0   | 27.5  | 36.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 44.7  | 0       | 0.0   | 62.3  | 43.5                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 5.0   | 0       | 0.0   | 3.3   | 4.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 17.6  | 0       | 0.0   | 10.3  | 15.5                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 33.0  | 0       | 0.0   | 29.8  | 36.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 44.3  | 0       | 0.0   | 56.7  | 43.5                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table C14**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: San Jose Metropolitan                                                                        |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 40                       | 6.7   | 7.1   | 7,086   | 5.6   | 6.0   | 5.9                      |
| Moderate                                                                                                                                                                                  | 122                      | 20.5  | 20.1  | 29,556  | 23.4  | 21.7  | 18.4                     |
| Middle                                                                                                                                                                                    | 225                      | 37.8  | 36.5  | 50,234  | 39.8  | 37.1  | 35.8                     |
| Upper                                                                                                                                                                                     | 208                      | 35.0  | 35.9  | 39,483  | 31.2  | 34.8  | 39.6                     |
| Unknown                                                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                      |
| Total                                                                                                                                                                                     | 595                      | 100.0 | 100.0 | 126,359 | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

**Table C15A**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Jose Metropolitan |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                   | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                               | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                               | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 1                        | 9.1   | 1.3   | 178     | 3.5   | 0.5   | 23.8                              |
| Moderate                                                                                                      | 0                        | 0.0   | 6.9   | 0       | 0.0   | 3.2   | 15.5                              |
| Middle                                                                                                        | 2                        | 18.2  | 19.0  | 695     | 13.7  | 13.0  | 18.5                              |
| Upper                                                                                                         | 7                        | 63.6  | 65.9  | 3,382   | 66.7  | 77.4  | 42.2                              |
| Unknown                                                                                                       | 1                        | 9.1   | 6.9   | 818     | 16.1  | 5.9   | 0.0                               |
| Total                                                                                                         | 11                       | 100.0 | 100.0 | 5,073   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 3                        | 4.2   | 4.2   | 472     | 1.0   | 2.5   | 23.8                              |
| Moderate                                                                                                      | 6                        | 8.5   | 12.3  | 1,636   | 3.3   | 8.4   | 15.5                              |
| Middle                                                                                                        | 11                       | 15.5  | 23.8  | 3,709   | 7.5   | 20.3  | 18.5                              |
| Upper                                                                                                         | 45                       | 63.4  | 52.1  | 40,667  | 82.7  | 61.4  | 42.2                              |
| Unknown                                                                                                       | 6                        | 8.5   | 7.5   | 2,677   | 5.4   | 7.4   | 0.0                               |
| Total                                                                                                         | 71                       | 100.0 | 100.0 | 49,161  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 5                        | 6.2   | 4.8   | 554     | 2.4   | 3.4   | 23.8                              |
| Moderate                                                                                                      | 8                        | 9.9   | 10.0  | 1,339   | 5.7   | 7.5   | 15.5                              |
| Middle                                                                                                        | 11                       | 13.6  | 19.5  | 2,016   | 8.6   | 16.3  | 18.5                              |
| Upper                                                                                                         | 56                       | 69.1  | 62.5  | 19,051  | 81.6  | 67.9  | 42.2                              |
| Unknown                                                                                                       | 1                        | 1.2   | 3.2   | 400     | 1.7   | 4.9   | 0.0                               |
| Total                                                                                                         | 81                       | 100.0 | 100.0 | 23,360  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 9                        | 3.9   | 3.8   | 1,204   | 1.3   | 2.1   | 23.8                              |
| Moderate                                                                                                      | 20                       | 8.8   | 11.4  | 4,041   | 4.2   | 7.2   | 15.5                              |
| Middle                                                                                                        | 43                       | 18.9  | 22.8  | 10,747  | 11.2  | 18.5  | 18.5                              |
| Upper                                                                                                         | 147                      | 64.5  | 54.4  | 75,863  | 78.8  | 64.9  | 42.2                              |
| Unknown                                                                                                       | 9                        | 3.9   | 7.6   | 4,395   | 4.6   | 7.4   | 0.0                               |
| Total                                                                                                         | 228                      | 100.0 | 100.0 | 96,250  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                       |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                     |                          |       |       |         |       |       |                                   |



Table C15B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Jose Metropolitan                                               |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.6   | 0       | 0.0   | 3.3   | 23.8                              |
| Moderate                                                                                                                                                    | 6                        | 9.2   | 9.1   | 1,066   | 5.7   | 5.4   | 15.5                              |
| Middle                                                                                                                                                      | 19                       | 29.2  | 18.0  | 4,327   | 23.2  | 12.4  | 18.5                              |
| Upper                                                                                                                                                       | 39                       | 60.0  | 64.4  | 12,763  | 68.4  | 72.8  | 42.2                              |
| Unknown                                                                                                                                                     | 1                        | 1.5   | 3.9   | 500     | 2.7   | 6.1   | 0.0                               |
| Total                                                                                                                                                       | 65                       | 100.0 | 100.0 | 18,656  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 6.1   | 0       | 0.0   | 2.3   | 23.8                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 12.0  | 0       | 0.0   | 6.0   | 15.5                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 19.3  | 0       | 0.0   | 11.5  | 18.5                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 58.7  | 0       | 0.0   | 73.3  | 42.2                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 3.8   | 0       | 0.0   | 6.9   | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 23.8                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.1   | 15.5                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.9   | 0       | 0.0   | 0.6   | 18.5                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 2.5   | 0       | 0.0   | 4.1   | 42.2                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 95.9  | 0       | 0.0   | 95.2  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table C16**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Jose Metropolitan                                    |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 274                      | 46.1  | 44.3  | 33,691  | 26.7  | 25.7  | 91.5                     |
| Over \$1 Million                                                          | 227                      | 38.2  |       | 73,926  | 58.5  |       | 8.1                      |
| Revenue Unknown                                                           | 94                       | 15.8  |       | 18,742  | 14.8  |       | 0.4                      |
| Total                                                                     | 595                      | 100.0 |       | 126,359 | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 310                      | 52.1  | 88.9  | 13,367  | 10.6  | 36.4  |                          |
| \$100,001 - \$250,000                                                     | 126                      | 21.2  | 6.7   | 22,826  | 18.1  | 20.5  |                          |
| \$250,001 - \$1 Million                                                   | 159                      | 26.7  | 4.4   | 90,166  | 71.4  | 43.1  |                          |
| Total                                                                     | 595                      | 100.0 | 100.0 | 126,359 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 188                      | 68.6  |       | 7,353   | 21.8  |       |                          |
| \$100,001 - \$250,000                                                     | 48                       | 17.5  |       | 8,026   | 23.8  |       |                          |
| \$250,001 - \$1 Million                                                   | 38                       | 13.9  |       | 18,312  | 54.4  |       |                          |
| Total                                                                     | 274                      | 100.0 |       | 33,691  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table C17A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan |                          |       |       |         |       |       |                              |
|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                            | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                          | #                        | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                      | 2                        | 7.1   | 2.9   | 717     | 8.5   | 1.8   | 3.0                          |
| Moderate                                                                                                                                 | 12                       | 42.9  | 23.5  | 2,764   | 32.9  | 16.4  | 24.2                         |
| Middle                                                                                                                                   | 7                        | 25.0  | 33.8  | 1,685   | 20.1  | 28.7  | 33.4                         |
| Upper                                                                                                                                    | 7                        | 25.0  | 39.7  | 3,233   | 38.5  | 52.5  | 39.4                         |
| Unknown                                                                                                                                  | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.6   | 0.1                          |
| Total                                                                                                                                    | 28                       | 100.0 | 100.0 | 8,399   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                          |                          |       |       |         |       |       |                              |
| Low                                                                                                                                      | 0                        | 0.0   | 1.5   | 0       | 0.0   | 1.0   | 3.0                          |
| Moderate                                                                                                                                 | 18                       | 30.0  | 14.9  | 4,151   | 10.7  | 10.8  | 24.2                         |
| Middle                                                                                                                                   | 11                       | 18.3  | 33.3  | 4,472   | 11.5  | 28.2  | 33.4                         |
| Upper                                                                                                                                    | 31                       | 51.7  | 50.3  | 30,295  | 77.8  | 59.2  | 39.4                         |
| Unknown                                                                                                                                  | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.7   | 0.1                          |
| Total                                                                                                                                    | 60                       | 100.0 | 100.0 | 38,918  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                   |                          |       |       |         |       |       |                              |
| Low                                                                                                                                      | 0                        | 0.0   | 1.1   | 0       | 0.0   | 0.8   | 3.0                          |
| Moderate                                                                                                                                 | 2                        | 8.7   | 13.5  | 216     | 5.1   | 8.3   | 24.2                         |
| Middle                                                                                                                                   | 4                        | 17.4  | 29.9  | 470     | 11.0  | 22.6  | 33.4                         |
| Upper                                                                                                                                    | 17                       | 73.9  | 55.5  | 3,576   | 83.9  | 68.2  | 39.4                         |
| Unknown                                                                                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                                    | 23                       | 100.0 | 100.0 | 4,262   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                        |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                      | 0                        | 0.0   | 20.1  | 0       | 0.0   | 9.6   |                              |
| Moderate                                                                                                                                 | 0                        | 0.0   | 40.2  | 0       | 0.0   | 37.9  | 33.9                         |
| Middle                                                                                                                                   | 0                        | 0.0   | 22.4  | 0       | 0.0   | 33.6  | 32.2                         |
| Upper                                                                                                                                    | 1                        | 100.0 | 16.7  | 2,146   | 100.0 | 18.9  | 27.2                         |
| Unknown                                                                                                                                  | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                    | 1                        | 100.0 | 100.0 | 2,146   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                                |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                      | 2                        | 1.5   | 2.1   | 717     | 1.2   | 1.6   |                              |
| Moderate                                                                                                                                 | 34                       | 25.6  | 18.8  | 7,351   | 12.8  | 14.0  | 24.2                         |
| Middle                                                                                                                                   | 29                       | 21.8  | 33.4  | 7,181   | 12.5  | 28.1  | 33.4                         |
| Upper                                                                                                                                    | 68                       | 51.1  | 45.5  | 42,368  | 73.5  | 55.2  | 39.4                         |
| Unknown                                                                                                                                  | 0                        | 0.0   | 0.1   | 0       | 0.0   | 1.1   | 0.1                          |
| Total                                                                                                                                    | 133                      | 100.0 | 100.0 | 57,617  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                                           |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                                  |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                           |                          |       |       |         |       |       |                              |

Table C17B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                    |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 1.0   | 0       | 0.0   | 0.6   | 3.0                          |
| Moderate                                                                                                                                                    | 1                        | 5.3   | 11.9  | 60      | 1.7   | 6.6   | 24.2                         |
| Middle                                                                                                                                                      | 6                        | 31.6  | 29.5  | 366     | 10.3  | 19.8  | 33.4                         |
| Upper                                                                                                                                                       | 12                       | 63.2  | 57.5  | 3,118   | 88.0  | 70.6  | 39.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.1   | 0       | 0.0   | 2.4   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 19                       | 100.0 | 100.0 | 3,544   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.2   | 0       | 0.0   | 0.2   | 3.0                          |
| Moderate                                                                                                                                                    | 1                        | 50.0  | 15.2  | 160     | 46.0  | 2.8   | 24.2                         |
| Middle                                                                                                                                                      | 1                        | 50.0  | 26.8  | 188     | 54.0  | 8.5   | 33.4                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 54.7  | 0       | 0.0   | 67.5  | 39.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 1.1   | 0       | 0.0   | 21.0  | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 2                        | 100.0 | 100.0 | 348     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.3   | 0       | 0.0   | 2.3   | 3.0                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 28.8  | 0       | 0.0   | 20.9  | 24.2                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 39.0  | 0       | 0.0   | 35.6  | 33.4                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 28.9  | 0       | 0.0   | 41.2  | 39.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table C18**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                 |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| <b>Low</b>                                                                                                                                                                                | 10                       | 6.1   | 5.9   | 1,957   | 6.0   | 8.2   | 5.3                      |
| <b>Moderate</b>                                                                                                                                                                           | 39                       | 23.8  | 23.1  | 8,590   | 26.5  | 24.8  | 23.1                     |
| <b>Middle</b>                                                                                                                                                                             | 30                       | 18.3  | 29.0  | 6,966   | 21.5  | 27.1  | 30.5                     |
| <b>Upper</b>                                                                                                                                                                              | 81                       | 49.4  | 41.5  | 14,232  | 43.9  | 39.3  | 40.9                     |
| <b>Unknown</b>                                                                                                                                                                            | 4                        | 2.4   | 0.3   | 702     | 2.2   | 0.4   | 0.3                      |
| <b>Total</b>                                                                                                                                                                              | 164                      | 100.0 | 100.0 | 32,447  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table C19A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan |                          |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                          | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                      | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                      | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                  |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                  | 0                        | 0.0   | 3.3   | 0       | 0.0   | 1.3   | 22.5                              |
| Moderate                                                                                                                             | 11                       | 39.3  | 16.5  | 2,383   | 28.4  | 10.0  | 17.3                              |
| Middle                                                                                                                               | 10                       | 35.7  | 22.2  | 2,377   | 28.3  | 18.0  | 18.3                              |
| Upper                                                                                                                                | 7                        | 25.0  | 46.0  | 3,639   | 43.3  | 59.1  | 41.9                              |
| Unknown                                                                                                                              | 0                        | 0.0   | 11.9  | 0       | 0.0   | 11.7  | 0.0                               |
| Total                                                                                                                                | 28                       | 100.0 | 100.0 | 8,399   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                  | 0                        | 0.0   | 2.5   | 0       | 0.0   | 1.1   | 22.5                              |
| Moderate                                                                                                                             | 8                        | 13.3  | 10.3  | 1,479   | 3.8   | 6.1   | 17.3                              |
| Middle                                                                                                                               | 11                       | 18.3  | 18.7  | 2,482   | 6.4   | 14.3  | 18.3                              |
| Upper                                                                                                                                | 33                       | 55.0  | 50.8  | 14,964  | 38.5  | 60.1  | 41.9                              |
| Unknown                                                                                                                              | 8                        | 13.3  | 17.8  | 19,993  | 51.4  | 18.4  | 0.0                               |
| Total                                                                                                                                | 60                       | 100.0 | 100.0 | 38,918  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                  | 1                        | 4.3   | 4.2   | 70      | 1.6   | 1.9   | 22.5                              |
| Moderate                                                                                                                             | 4                        | 17.4  | 11.8  | 515     | 12.1  | 6.7   | 17.3                              |
| Middle                                                                                                                               | 3                        | 13.0  | 17.6  | 705     | 16.5  | 12.0  | 18.3                              |
| Upper                                                                                                                                | 14                       | 60.9  | 62.6  | 2,822   | 66.2  | 72.7  | 41.9                              |
| Unknown                                                                                                                              | 1                        | 4.3   | 3.8   | 150     | 3.5   | 6.7   | 0.0                               |
| Total                                                                                                                                | 23                       | 100.0 | 100.0 | 4,262   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                            |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                  | 1                        | 0.8   | 2.9   | 70      | 0.1   | 1.2   | 22.5                              |
| Moderate                                                                                                                             | 24                       | 18.2  | 12.8  | 4,437   | 8.0   | 7.7   | 17.3                              |
| Middle                                                                                                                               | 29                       | 22.0  | 19.7  | 6,145   | 11.1  | 15.5  | 18.3                              |
| Upper                                                                                                                                | 67                       | 50.8  | 48.1  | 24,523  | 44.2  | 59.1  | 41.9                              |
| Unknown                                                                                                                              | 11                       | 8.3   | 16.6  | 20,296  | 36.6  | 16.5  | 0.0                               |
| Total                                                                                                                                | 132                      | 100.0 | 100.0 | 55,471  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                                       |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                              |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                       |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                            |                          |       |       |         |       |       |                                   |

Table C19B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                        |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 5.3   | 0       | 0.0   | 2.8   | 22.5                              |
| Moderate                                                                                                                                                    | 1                        | 5.3   | 10.9  | 60      | 1.7   | 5.2   | 17.3                              |
| Middle                                                                                                                                                      | 4                        | 21.1  | 15.8  | 421     | 11.9  | 8.5   | 18.3                              |
| Upper                                                                                                                                                       | 12                       | 63.2  | 64.5  | 2,910   | 82.1  | 79.7  | 41.9                              |
| Unknown                                                                                                                                                     | 2                        | 10.5  | 3.3   | 153     | 4.3   | 3.8   | 0.0                               |
| Total                                                                                                                                                       | 19                       | 100.0 | 100.0 | 3,544   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.7   | 0       | 0.0   | 0.9   | 22.5                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 11.0  | 0       | 0.0   | 2.2   | 17.3                              |
| Middle                                                                                                                                                      | 1                        | 50.0  | 14.3  | 160     | 46.0  | 2.9   | 18.3                              |
| Upper                                                                                                                                                       | 1                        | 50.0  | 55.9  | 188     | 54.0  | 62.1  | 41.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 14.1  | 0       | 0.0   | 32.0  | 0.0                               |
| Total                                                                                                                                                       | 2                        | 100.0 | 100.0 | 348     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 1.4   | 0       | 0.0   | 0.8   | 22.5                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 2.4   | 0       | 0.0   | 2.0   | 17.3                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 2.1   | 0       | 0.0   | 2.3   | 18.3                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 1.5   | 0       | 0.0   | 2.2   | 41.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 92.5  | 0       | 0.0   | 92.8  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table C20**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses<br>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan                                                |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
|                                                                                                                                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                                                                                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                                                                                       | 89                       | 54.3  | 41.0  | 10,690  | 32.9  | 24.3  | 93.9                     |
| Over \$1 Million                                                                                                                                                                          | 46                       | 28.0  |       | 14,086  | 43.4  |       | 5.0                      |
| Revenue Unknown                                                                                                                                                                           | 29                       | 17.7  |       | 7,671   | 23.6  |       | 1.1                      |
| Total                                                                                                                                                                                     | 164                      | 100.0 |       | 32,447  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                                                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 90                       | 54.9  | 91.5  | 3,359   | 10.4  | 41.9  |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 29                       | 17.7  | 5.4   | 5,096   | 15.7  | 21.1  |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 45                       | 27.4  | 3.1   | 23,992  | 73.9  | 37.0  |                          |
| Total                                                                                                                                                                                     | 164                      | 100.0 | 100.0 | 32,447  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 63                       | 70.8  |       | 2,289   | 21.4  |       |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 12                       | 13.5  |       | 1,980   | 18.5  |       |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 14                       | 15.7  |       | 6,421   | 60.1  |       |                          |
| Total                                                                                                                                                                                     | 89                       | 100.0 |       | 10,690  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |



Table C21A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Southeast Michigan Metropolitan                        |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 4                        | 2.3   | 3.1   | 322     | 0.8   | 1.6   | 6.1                          |
| Moderate                                                                | 19                       | 11.0  | 16.4  | 3,238   | 8.5   | 10.9  | 19.4                         |
| Middle                                                                  | 66                       | 38.4  | 38.9  | 10,425  | 27.5  | 34.8  | 36.3                         |
| Upper                                                                   | 83                       | 48.3  | 41.4  | 23,920  | 63.1  | 52.7  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 172                      | 100.0 | 100.0 | 37,905  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 12                       | 1.8   | 0.9   | 1,077   | 0.8   | 0.5   | 6.1                          |
| Moderate                                                                | 74                       | 11.3  | 9.1   | 9,089   | 6.9   | 6.0   | 19.4                         |
| Middle                                                                  | 206                      | 31.4  | 35.4  | 33,659  | 25.4  | 30.4  | 36.3                         |
| Upper                                                                   | 365                      | 55.6  | 54.6  | 88,797  | 67.0  | 63.0  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 657                      | 100.0 | 100.0 | 132,622 | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 11                       | 3.5   | 2.1   | 694     | 2.2   | 1.2   | 6.1                          |
| Moderate                                                                | 41                       | 13.1  | 10.5  | 2,351   | 7.4   | 7.5   | 19.4                         |
| Middle                                                                  | 90                       | 28.8  | 35.1  | 6,380   | 20.1  | 30.9  | 36.3                         |
| Upper                                                                   | 170                      | 54.3  | 52.2  | 22,245  | 70.2  | 60.3  | 38.1                         |
| Unknown                                                                 | 1                        | 0.3   | 0.0   | 21      | 0.1   | 0.0   | 0.1                          |
| Total                                                                   | 313                      | 100.0 | 100.0 | 31,691  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 14.8  | 0       | 0.0   | 16.0  |                              |
| Moderate                                                                | 0                        | 0.0   | 33.9  | 0       | 0.0   | 22.8  | 29.2                         |
| Middle                                                                  | 0                        | 0.0   | 33.9  | 0       | 0.0   | 36.5  | 31.3                         |
| Upper                                                                   | 1                        | 100.0 | 17.4  | 289     | 100.0 | 24.6  | 22.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.7                          |
| Total                                                                   | 1                        | 100.0 | 100.0 | 289     | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 32                       | 2.3   | 1.7   | 2,257   | 0.9   | 1.2   |                              |
| Moderate                                                                | 159                      | 11.4  | 11.5  | 16,509  | 6.7   | 7.9   | 19.4                         |
| Middle                                                                  | 436                      | 31.3  | 36.5  | 58,343  | 23.8  | 31.9  | 36.3                         |
| Upper                                                                   | 764                      | 54.9  | 50.3  | 167,675 | 68.5  | 58.9  | 38.1                         |
| Unknown                                                                 | 1                        | 0.1   | 0.0   | 21      | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 1,392                    | 100.0 | 100.0 | 244,805 | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table C21B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Southeast Michigan Metropolitan                                 |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 5                        | 2.1   | 1.2   | 164     | 0.5   | 0.8   | 6.1                          |
| Moderate                                                                                                                                                    | 24                       | 10.1  | 8.1   | 1,761   | 5.2   | 4.9   | 19.4                         |
| Middle                                                                                                                                                      | 73                       | 30.7  | 33.1  | 7,787   | 22.9  | 27.3  | 36.3                         |
| Upper                                                                                                                                                       | 136                      | 57.1  | 57.6  | 24,360  | 71.5  | 67.0  | 38.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 238                      | 100.0 | 100.0 | 34,072  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.4   | 0       | 0.0   | 1.7   | 6.1                          |
| Moderate                                                                                                                                                    | 1                        | 9.1   | 14.9  | 70      | 0.9   | 8.2   | 19.4                         |
| Middle                                                                                                                                                      | 1                        | 9.1   | 36.0  | 92      | 1.1   | 25.1  | 36.3                         |
| Upper                                                                                                                                                       | 9                        | 81.8  | 45.6  | 8,064   | 98.0  | 64.9  | 38.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                                                       | 11                       | 100.0 | 100.0 | 8,226   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.5   | 0       | 0.0   | 2.4   | 6.1                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 21.7  | 0       | 0.0   | 18.5  | 19.4                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 42.9  | 0       | 0.0   | 40.1  | 36.3                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 30.9  | 0       | 0.0   | 39.0  | 38.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table C22**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Southeast Michigan Metropolitan |                          |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                              | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                              | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                          | 669                      | 10.5  | 6.8   | 106,472 | 11.5  | 7.6   | 7.6                      |
| Moderate                                                                                                                     | 1,515                    | 23.7  | 19.9  | 221,790 | 24.0  | 21.5  | 20.6                     |
| Middle                                                                                                                       | 1,647                    | 25.8  | 29.9  | 225,487 | 24.4  | 26.8  | 31.2                     |
| Upper                                                                                                                        | 2,463                    | 38.6  | 42.7  | 346,977 | 37.6  | 42.9  | 40.1                     |
| Unknown                                                                                                                      | 88                       | 1.4   | 0.5   | 22,843  | 2.5   | 1.1   | 0.6                      |
| Total                                                                                                                        | 6,382                    | 100.0 | 100.0 | 923,569 | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C23A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Southeast Michigan Metropolitan                                                                                                                  |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 26                       | 15.1  | 11.4  | 2,926   | 7.7   | 6.4   | 22.7                              |
| Moderate                                                                                                                                                                                                                                 | 36                       | 20.9  | 23.7  | 5,902   | 15.6  | 17.8  | 16.5                              |
| Middle                                                                                                                                                                                                                                   | 29                       | 16.9  | 23.4  | 4,958   | 13.1  | 22.3  | 18.8                              |
| Upper                                                                                                                                                                                                                                    | 58                       | 33.7  | 31.1  | 18,991  | 50.1  | 43.4  | 42.0                              |
| Unknown                                                                                                                                                                                                                                  | 23                       | 13.4  | 10.3  | 5,128   | 13.5  | 10.2  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 172                      | 100.0 | 100.0 | 37,905  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 76                       | 11.6  | 5.8   | 6,746   | 5.1   | 3.1   | 22.7                              |
| Moderate                                                                                                                                                                                                                                 | 131                      | 19.9  | 15.3  | 18,400  | 13.9  | 10.8  | 16.5                              |
| Middle                                                                                                                                                                                                                                   | 106                      | 16.1  | 23.2  | 15,440  | 11.6  | 20.5  | 18.8                              |
| Upper                                                                                                                                                                                                                                    | 226                      | 34.4  | 42.3  | 66,769  | 50.3  | 52.2  | 42.0                              |
| Unknown                                                                                                                                                                                                                                  | 118                      | 18.0  | 13.4  | 25,267  | 19.1  | 13.4  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 657                      | 100.0 | 100.0 | 132,622 | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 46                       | 14.7  | 7.9   | 2,373   | 7.5   | 5.2   | 22.7                              |
| Moderate                                                                                                                                                                                                                                 | 55                       | 17.6  | 15.9  | 4,107   | 13.0  | 12.0  | 16.5                              |
| Middle                                                                                                                                                                                                                                   | 73                       | 23.3  | 22.7  | 6,008   | 19.0  | 18.7  | 18.8                              |
| Upper                                                                                                                                                                                                                                    | 117                      | 37.4  | 51.2  | 16,905  | 53.3  | 60.6  | 42.0                              |
| Unknown                                                                                                                                                                                                                                  | 22                       | 7.0   | 2.3   | 2,298   | 7.3   | 3.5   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 313                      | 100.0 | 100.0 | 31,691  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 185                      | 13.3  | 7.5   | 14,409  | 5.9   | 4.1   | 22.7                              |
| Moderate                                                                                                                                                                                                                                 | 260                      | 18.7  | 17.6  | 31,621  | 12.9  | 12.8  | 16.5                              |
| Middle                                                                                                                                                                                                                                   | 246                      | 17.7  | 22.8  | 29,944  | 12.2  | 20.8  | 18.8                              |
| Upper                                                                                                                                                                                                                                    | 534                      | 38.4  | 38.8  | 135,407 | 55.4  | 49.3  | 42.0                              |
| Unknown                                                                                                                                                                                                                                  | 166                      | 11.9  | 13.3  | 33,135  | 13.6  | 13.0  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 1,391                    | 100.0 | 100.0 | 244,516 | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table C23B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Southeast Michigan Metropolitan |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                         | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                                     | 36                       | 15.1  | 8.6   | 2,272   | 6.7   | 5.7   | 22.7                              |
| Moderate                                                                                                                | 36                       | 15.1  | 15.1  | 3,013   | 8.8   | 10.8  | 16.5                              |
| Middle                                                                                                                  | 38                       | 16.0  | 19.9  | 3,538   | 10.4  | 15.4  | 18.8                              |
| Upper                                                                                                                   | 125                      | 52.5  | 55.0  | 24,807  | 72.8  | 66.8  | 42.0                              |
| Unknown                                                                                                                 | 3                        | 1.3   | 1.3   | 442     | 1.3   | 1.2   | 0.0                               |
| Total                                                                                                                   | 238                      | 100.0 | 100.0 | 34,072  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                             |                          |       |       |         |       |       |                                   |
| Low                                                                                                                     | 1                        | 9.1   | 9.9   | 92      | 1.1   | 5.6   | 22.7                              |
| Moderate                                                                                                                | 2                        | 18.2  | 17.9  | 199     | 2.4   | 10.8  | 16.5                              |
| Middle                                                                                                                  | 0                        | 0.0   | 23.0  | 0       | 0.0   | 15.3  | 18.8                              |
| Upper                                                                                                                   | 8                        | 72.7  | 42.8  | 7,935   | 96.5  | 57.6  | 42.0                              |
| Unknown                                                                                                                 | 0                        | 0.0   | 6.3   | 0       | 0.0   | 10.7  | 0.0                               |
| Total                                                                                                                   | 11                       | 100.0 | 100.0 | 8,226   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                  |                          |       |       |         |       |       |                                   |
| Low                                                                                                                     | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 22.7                              |
| Moderate                                                                                                                | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 16.5                              |
| Middle                                                                                                                  | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 18.8                              |
| Upper                                                                                                                   | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.6   | 42.0                              |
| Unknown                                                                                                                 | 0                        | 0.0   | 98.4  | 0       | 0.0   | 98.3  | 0.0                               |
| Total                                                                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                          |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                 |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                                   |

**Table C24**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Southeast Michigan Metropolitan                          |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 3,496                    | 54.8  | 41.5  | 262,022 | 28.4  | 24.4  | 90.8                     |
| Over \$1 Million                                                          | 1,889                    | 29.6  |       | 539,620 | 58.4  |       | 8.6                      |
| Revenue Unknown                                                           | 997                      | 15.6  |       | 121,927 | 13.2  |       | 0.7                      |
| Total                                                                     | 6,382                    | 100.0 |       | 923,569 | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 4,210                    | 66.0  | 86.7  | 153,995 | 16.7  | 29.8  |                          |
| \$100,001 - \$250,000                                                     | 1,066                    | 16.7  | 7.6   | 184,569 | 20.0  | 21.0  |                          |
| \$250,001 - \$1 Million                                                   | 1,106                    | 17.3  | 5.7   | 585,005 | 63.3  | 49.2  |                          |
| Total                                                                     | 6,382                    | 100.0 | 100.0 | 923,569 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 2,866                    | 82.0  |       | 97,349  | 37.2  |       |                          |
| \$100,001 - \$250,000                                                     | 434                      | 12.4  |       | 71,054  | 27.1  |       |                          |
| \$250,001 - \$1 Million                                                   | 196                      | 5.6   |       | 93,619  | 35.7  |       |                          |
| Total                                                                     | 3,496                    | 100.0 |       | 262,022 | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table C25A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ann Arbor MSA                                          |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 9.1   | 8.2   | 273     | 9.7   | 4.6   | 6.6                          |
| Moderate                                                                | 2                        | 18.2  | 13.9  | 593     | 21.0  | 10.3  | 12.0                         |
| Middle                                                                  | 4                        | 36.4  | 45.5  | 653     | 23.1  | 43.4  | 44.7                         |
| Upper                                                                   | 4                        | 36.4  | 32.0  | 1,306   | 46.2  | 41.3  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                   | 11                       | 100.0 | 100.0 | 2,825   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 1.9   | 3.4   | 2,000   | 14.3  | 2.1   | 6.6                          |
| Moderate                                                                | 4                        | 7.5   | 9.3   | 478     | 3.4   | 6.8   | 12.0                         |
| Middle                                                                  | 21                       | 39.6  | 44.3  | 5,220   | 37.3  | 40.5  | 44.7                         |
| Upper                                                                   | 27                       | 50.9  | 42.7  | 6,291   | 45.0  | 50.4  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.2                          |
| Total                                                                   | 53                       | 100.0 | 100.0 | 13,989  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.8   | 0       | 0.0   | 1.8   | 6.6                          |
| Moderate                                                                | 2                        | 11.8  | 8.0   | 150     | 5.6   | 6.8   | 12.0                         |
| Middle                                                                  | 6                        | 35.3  | 40.3  | 384     | 14.4  | 34.0  | 44.7                         |
| Upper                                                                   | 9                        | 52.9  | 47.4  | 2,139   | 80.0  | 56.8  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.6   | 0.2                          |
| Total                                                                   | 17                       | 100.0 | 100.0 | 2,673   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 46.2  | 0       | 0.0   | 23.1  |                              |
| Moderate                                                                | 0                        | 0.0   | 13.5  | 0       | 0.0   | 22.6  | 18.6                         |
| Middle                                                                  | 1                        | 100.0 | 28.8  | 2,100   | 100.0 | 41.0  | 34.6                         |
| Upper                                                                   | 0                        | 0.0   | 7.7   | 0       | 0.0   | 9.9   | 11.8                         |
| Unknown                                                                 | 0                        | 0.0   | 3.8   | 0       | 0.0   | 3.4   | 6.8                          |
| Total                                                                   | 1                        | 100.0 | 100.0 | 2,100   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 2                        | 2.1   | 4.9   | 2,273   | 9.7   | 4.3   |                              |
| Moderate                                                                | 8                        | 8.4   | 10.6  | 1,221   | 5.2   | 8.9   | 12.0                         |
| Middle                                                                  | 39                       | 41.1  | 44.4  | 9,483   | 40.6  | 41.2  | 44.7                         |
| Upper                                                                   | 46                       | 48.4  | 39.9  | 10,402  | 44.5  | 45.0  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                   | 95                       | 100.0 | 100.0 | 23,379  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table C25B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ann Arbor MSA                                          |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.7   | 0       | 0.0   | 1.0   | 6.6                          |
| Moderate                                                                | 0                        | 0.0   | 8.5   | 0       | 0.0   | 4.5   | 12.0                         |
| Middle                                                                  | 6                        | 50.0  | 39.3  | 918     | 58.0  | 36.9  | 44.7                         |
| Upper                                                                   | 6                        | 50.0  | 49.5  | 666     | 42.0  | 57.5  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 12                       | 100.0 | 100.0 | 1,584   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 6.9   | 0       | 0.0   | 4.8   | 6.6                          |
| Moderate                                                                | 0                        | 0.0   | 7.8   | 0       | 0.0   | 2.4   | 12.0                         |
| Middle                                                                  | 1                        | 100.0 | 45.7  | 208     | 100.0 | 35.0  | 44.7                         |
| Upper                                                                   | 0                        | 0.0   | 38.8  | 0       | 0.0   | 56.2  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.9   | 0       | 0.0   | 1.6   | 0.2                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 1                        | 100.0 | 100.0 | 208     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 7.6   | 0       | 0.0   | 5.3   | 6.6                          |
| Moderate                                                                | 0                        | 0.0   | 15.6  | 0       | 0.0   | 15.0  | 12.0                         |
| Middle                                                                  | 0                        | 0.0   | 38.4  | 0       | 0.0   | 45.9  | 44.7                         |
| Upper                                                                   | 0                        | 0.0   | 38.4  | 0       | 0.0   | 33.8  | 36.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table C26

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Ann Arbor MSA |                          |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                            | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                        | 31                       | 8.8   | 7.6   | 4,541   | 8.7   | 5.9   | 8.7                      |
| Moderate                                                                                                   | 22                       | 6.3   | 9.3   | 2,385   | 4.6   | 8.3   | 9.2                      |
| Middle                                                                                                     | 165                      | 47.0  | 44.7  | 24,362  | 46.7  | 47.0  | 43.8                     |
| Upper                                                                                                      | 113                      | 32.2  | 32.4  | 17,883  | 34.3  | 28.9  | 32.1                     |
| Unknown                                                                                                    | 20                       | 5.7   | 5.9   | 3,039   | 5.8   | 9.8   | 6.1                      |
| Total                                                                                                      | 351                      | 100.0 | 100.0 | 52,210  | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C27A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ann Arbor MSA |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                       | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                       | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                   | 1                        | 9.1   | 11.4  | 71      | 2.5   | 5.9   | 22.7                              |
| Moderate                                                                                              | 5                        | 45.5  | 24.1  | 1,172   | 41.5  | 18.0  | 17.0                              |
| Middle                                                                                                | 0                        | 0.0   | 22.4  | 0       | 0.0   | 21.1  | 19.6                              |
| Upper                                                                                                 | 4                        | 36.4  | 35.0  | 1,288   | 45.6  | 47.7  | 40.7                              |
| Unknown                                                                                               | 1                        | 9.1   | 7.1   | 294     | 10.4  | 7.2   | 0.0                               |
| Total                                                                                                 | 11                       | 100.0 | 100.0 | 2,825   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                                                   | 8                        | 15.1  | 6.0   | 774     | 5.5   | 3.2   | 22.7                              |
| Moderate                                                                                              | 10                       | 18.9  | 19.2  | 1,568   | 11.2  | 13.6  | 17.0                              |
| Middle                                                                                                | 15                       | 28.3  | 24.6  | 3,349   | 23.9  | 22.5  | 19.6                              |
| Upper                                                                                                 | 16                       | 30.2  | 41.3  | 5,932   | 42.4  | 51.7  | 40.7                              |
| Unknown                                                                                               | 4                        | 7.5   | 8.9   | 2,366   | 16.9  | 9.0   | 0.0                               |
| Total                                                                                                 | 53                       | 100.0 | 100.0 | 13,989  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                   | 1                        | 5.9   | 7.8   | 50      | 1.9   | 4.0   | 22.7                              |
| Moderate                                                                                              | 3                        | 17.6  | 17.6  | 430     | 16.1  | 13.0  | 17.0                              |
| Middle                                                                                                | 4                        | 23.5  | 19.9  | 183     | 6.8   | 17.3  | 19.6                              |
| Upper                                                                                                 | 9                        | 52.9  | 52.8  | 2,010   | 75.2  | 63.7  | 40.7                              |
| Unknown                                                                                               | 0                        | 0.0   | 1.9   | 0       | 0.0   | 2.0   | 0.0                               |
| Total                                                                                                 | 17                       | 100.0 | 100.0 | 2,673   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                             |                          |       |       |         |       |       |                                   |
| Low                                                                                                   | 12                       | 12.8  | 7.5   | 1,006   | 4.7   | 4.0   | 22.7                              |
| Moderate                                                                                              | 20                       | 21.3  | 20.2  | 3,413   | 16.0  | 14.8  | 17.0                              |
| Middle                                                                                                | 24                       | 25.5  | 23.5  | 4,089   | 19.2  | 21.9  | 19.6                              |
| Upper                                                                                                 | 33                       | 35.1  | 39.7  | 10,111  | 47.5  | 50.5  | 40.7                              |
| Unknown                                                                                               | 5                        | 5.3   | 9.1   | 2,660   | 12.5  | 8.9   | 0.0                               |
| Total                                                                                                 | 94                       | 100.0 | 100.0 | 21,279  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                        |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                               |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                        |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                             |                          |       |       |         |       |       |                                   |



Table C27B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ann Arbor MSA                                                       |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                        | 16.7  | 5.8   | 111     | 7.0   | 3.4   | 22.7                              |
| Moderate                                                                                                                                                    | 1                        | 8.3   | 16.9  | 35      | 2.2   | 12.6  | 17.0                              |
| Middle                                                                                                                                                      | 5                        | 41.7  | 21.4  | 557     | 35.2  | 18.6  | 19.6                              |
| Upper                                                                                                                                                       | 4                        | 33.3  | 54.2  | 881     | 55.6  | 64.0  | 40.7                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 1.7   | 0       | 0.0   | 1.4   | 0.0                               |
| Total                                                                                                                                                       | 12                       | 100.0 | 100.0 | 1,584   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 8.6   | 0       | 0.0   | 3.4   | 22.7                              |
| Moderate                                                                                                                                                    | 1                        | 100.0 | 24.1  | 208     | 100.0 | 12.4  | 17.0                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 22.4  | 0       | 0.0   | 19.1  | 19.6                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 37.9  | 0       | 0.0   | 57.3  | 40.7                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 6.9   | 0       | 0.0   | 7.9   | 0.0                               |
| Total                                                                                                                                                       | 1                        | 100.0 | 100.0 | 208     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.4   | 22.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.0   | 17.0                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.6                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.7                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 99.1  | 0       | 0.0   | 99.6  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table C28**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Ann Arbor MSA                                                                                          |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | %     | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 200                      | 57.0  | 39.1  | 15,528  | 29.7  | 23.6  | 91.2                     |
| Over \$1 Million                                                                                                        | 104                      | 29.6  |       | 32,290  | 61.8  |       | 8.1                      |
| Revenue Unknown                                                                                                         | 47                       | 13.4  |       | 4,392   | 8.4   |       | 0.6                      |
| Total                                                                                                                   | 351                      | 100.0 |       | 52,210  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 237                      | 67.5  | 85.4  | 8,237   | 15.8  | 28.9  |                          |
| \$100,001 - \$250,000                                                                                                   | 57                       | 16.2  | 8.7   | 10,047  | 19.2  | 22.7  |                          |
| \$250,001 - \$1 Million                                                                                                 | 57                       | 16.2  | 5.9   | 33,926  | 65.0  | 48.4  |                          |
| Total                                                                                                                   | 351                      | 100.0 | 100.0 | 52,210  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 167                      | 83.5  |       | 5,625   | 36.2  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 21                       | 10.5  |       | 3,760   | 24.2  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 12                       | 6.0   |       | 6,143   | 39.6  |       |                          |
| Total                                                                                                                   | 200                      | 100.0 |       | 15,528  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

Table C29A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Dallas-Fort Worth Metropolitan |                          |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                            | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                        |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 1                        | 1.9   | 3.6   | 78      | 0.4   | 2.4   | 5.4                          |
| Moderate                                                                                                                   | 6                        | 11.1  | 12.6  | 1,304   | 6.0   | 9.0   | 19.4                         |
| Middle                                                                                                                     | 12                       | 22.2  | 33.5  | 2,796   | 12.9  | 28.1  | 29.7                         |
| Upper                                                                                                                      | 34                       | 63.0  | 50.1  | 17,162  | 79.1  | 60.2  | 45.4                         |
| Unknown                                                                                                                    | 1                        | 1.9   | 0.2   | 369     | 1.7   | 0.2   | 0.1                          |
| Total                                                                                                                      | 54                       | 100.0 | 100.0 | 21,709  | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                            |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 21                       | 6.0   | 1.8   | 2,743   | 3.1   | 1.5   | 5.4                          |
| Moderate                                                                                                                   | 54                       | 15.4  | 8.2   | 7,456   | 8.3   | 5.5   | 19.4                         |
| Middle                                                                                                                     | 73                       | 20.9  | 25.9  | 11,759  | 13.1  | 20.7  | 29.7                         |
| Upper                                                                                                                      | 202                      | 57.7  | 64.1  | 67,927  | 75.6  | 72.2  | 45.4                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                      | 350                      | 100.0 | 100.0 | 89,885  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                     |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 5                        | 4.1   | 1.9   | 314     | 1.8   | 1.4   | 5.4                          |
| Moderate                                                                                                                   | 14                       | 11.4  | 8.6   | 1,196   | 6.7   | 6.5   | 19.4                         |
| Middle                                                                                                                     | 32                       | 26.0  | 22.3  | 4,335   | 24.3  | 18.2  | 29.7                         |
| Upper                                                                                                                      | 72                       | 58.5  | 67.1  | 11,959  | 67.2  | 73.8  | 45.4                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                      | 123                      | 100.0 | 100.0 | 17,804  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                          |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                        | 0                        | 0.0   | 22.1  | 0       | 0.0   | 17.1  |                              |
| Moderate                                                                                                                   | 1                        | 100.0 | 36.6  | 85      | 100.0 | 25.9  | 27.7                         |
| Middle                                                                                                                     | 0                        | 0.0   | 24.4  | 0       | 0.0   | 27.1  | 26.2                         |
| Upper                                                                                                                      | 0                        | 0.0   | 16.7  | 0       | 0.0   | 29.9  | 23.1                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0.6                          |
| Total                                                                                                                      | 1                        | 100.0 | 100.0 | 85      | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                  |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                        | 34                       | 5.1   | 2.6   | 3,848   | 2.4   | 2.7   |                              |
| Moderate                                                                                                                   | 92                       | 13.9  | 10.6  | 12,069  | 7.6   | 8.2   | 19.4                         |
| Middle                                                                                                                     | 151                      | 22.8  | 29.4  | 23,553  | 14.8  | 24.3  | 29.7                         |
| Upper                                                                                                                      | 384                      | 58.0  | 57.1  | 119,783 | 75.0  | 64.7  | 45.4                         |
| Unknown                                                                                                                    | 1                        | 0.2   | 0.1   | 369     | 0.2   | 0.2   | 0.1                          |
| Total                                                                                                                      | 662                      | 100.0 | 100.0 | 159,622 | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                             |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                    |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                             |                          |       |       |         |       |       |                              |

**Table C29B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Dallas-Fort Worth Metropolitan                                  |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 7                        | 5.5   | 1.4   | 713     | 2.6   | 0.7   | 5.4                          |
| Moderate                                                                                                                                                    | 16                       | 12.6  | 7.6   | 1,908   | 6.8   | 4.5   | 19.4                         |
| Middle                                                                                                                                                      | 32                       | 25.2  | 19.2  | 4,454   | 16.0  | 12.6  | 29.7                         |
| Upper                                                                                                                                                       | 72                       | 56.7  | 71.7  | 20,825  | 74.6  | 82.2  | 45.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 127                      | 100.0 | 100.0 | 27,900  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.0   | 0       | 0.0   | 1.4   | 5.4                          |
| Moderate                                                                                                                                                    | 1                        | 14.3  | 13.0  | 120     | 5.4   | 7.3   | 19.4                         |
| Middle                                                                                                                                                      | 2                        | 28.6  | 26.7  | 209     | 9.3   | 15.7  | 29.7                         |
| Upper                                                                                                                                                       | 4                        | 57.1  | 57.1  | 1,910   | 85.3  | 72.4  | 45.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.2   | 0       | 0.0   | 3.2   | 0.1                          |
| Total                                                                                                                                                       | 7                        | 100.0 | 100.0 | 2,239   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.7   | 0       | 0.0   | 2.0   | 5.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 23.7  | 0       | 0.0   | 14.5  | 19.4                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 38.9  | 0       | 0.0   | 33.0  | 29.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 33.6  | 0       | 0.0   | 50.5  | 45.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table C30**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Dallas-Fort Worth Metropolitan |                          |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                         | 268                      | 14.1  | 4.4   | 55,046  | 16.2  | 4.8   | 7.6                      |
| Moderate                                                                                                                    | 491                      | 25.8  | 18.1  | 97,953  | 28.9  | 18.8  | 19.3                     |
| Middle                                                                                                                      | 431                      | 22.6  | 28.9  | 74,049  | 21.8  | 28.0  | 26.7                     |
| Upper                                                                                                                       | 678                      | 35.6  | 47.4  | 99,982  | 29.5  | 47.3  | 45.8                     |
| Unknown                                                                                                                     | 37                       | 1.9   | 0.9   | 12,436  | 3.7   | 1.0   | 0.6                      |
| Total                                                                                                                       | 1,905                    | 100.0 | 100.0 | 339,466 | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C31A

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level<br>Assessment Area: Dallas-Fort Worth Metropolitan                      |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                             | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                                                         |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                         | 1                        | 1.9   | 3.9   | 78      | 0.4   | 2.0   | 23.4                              |
| Moderate                                                                                                                                    | 9                        | 16.7  | 18.0  | 1,865   | 8.6   | 12.3  | 16.3                              |
| Middle                                                                                                                                      | 8                        | 14.8  | 24.0  | 1,918   | 8.8   | 20.8  | 18.0                              |
| Upper                                                                                                                                       | 26                       | 48.1  | 44.3  | 13,893  | 64.0  | 54.8  | 42.3                              |
| Unknown                                                                                                                                     | 10                       | 18.5  | 9.8   | 3,955   | 18.2  | 10.1  | 0.0                               |
| Total                                                                                                                                       | 54                       | 100.0 | 100.0 | 21,709  | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                             |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                         | 42                       | 12.0  | 2.6   | 4,078   | 4.5   | 1.2   | 23.4                              |
| Moderate                                                                                                                                    | 53                       | 15.1  | 9.0   | 7,133   | 7.9   | 5.5   | 16.3                              |
| Middle                                                                                                                                      | 75                       | 21.4  | 17.1  | 12,524  | 13.9  | 13.3  | 18.0                              |
| Upper                                                                                                                                       | 144                      | 41.1  | 52.1  | 53,939  | 60.0  | 61.0  | 42.3                              |
| Unknown                                                                                                                                     | 36                       | 10.3  | 19.1  | 12,211  | 13.6  | 19.1  | 0.0                               |
| Total                                                                                                                                       | 350                      | 100.0 | 100.0 | 89,885  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                         | 20                       | 16.3  | 3.4   | 1,225   | 6.9   | 1.9   | 23.4                              |
| Moderate                                                                                                                                    | 16                       | 13.0  | 10.2  | 1,734   | 9.7   | 7.5   | 16.3                              |
| Middle                                                                                                                                      | 22                       | 17.9  | 15.7  | 2,426   | 13.6  | 12.1  | 18.0                              |
| Upper                                                                                                                                       | 61                       | 49.6  | 66.8  | 12,132  | 68.1  | 73.4  | 42.3                              |
| Unknown                                                                                                                                     | 4                        | 3.3   | 4.0   | 287     | 1.6   | 5.1   | 0.0                               |
| Total                                                                                                                                       | 123                      | 100.0 | 100.0 | 17,804  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                         | 74                       | 11.2  | 3.1   | 6,257   | 3.9   | 1.5   | 23.4                              |
| Moderate                                                                                                                                    | 102                      | 15.4  | 12.6  | 13,256  | 8.3   | 8.4   | 16.3                              |
| Middle                                                                                                                                      | 125                      | 18.9  | 19.4  | 19,629  | 12.3  | 16.4  | 18.0                              |
| Upper                                                                                                                                       | 306                      | 46.3  | 47.4  | 102,640 | 64.3  | 57.4  | 42.3                              |
| Unknown                                                                                                                                     | 54                       | 8.2   | 17.5  | 17,755  | 11.1  | 16.3  | 0.0                               |
| Total                                                                                                                                       | 661                      | 100.0 | 100.0 | 159,537 | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey                                                   |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table C31B

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level<br>Assessment Area: Dallas-Fort Worth Metropolitan                                      |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 10                       | 7.9   | 5.8   | 782     | 2.8   | 3.1   | 23.4                              |
| Moderate                                                                                                                                                    | 21                       | 16.5  | 10.5  | 2,056   | 7.4   | 5.6   | 16.3                              |
| Middle                                                                                                                                                      | 20                       | 15.7  | 14.6  | 2,761   | 9.9   | 10.2  | 18.0                              |
| Upper                                                                                                                                                       | 73                       | 57.5  | 66.8  | 21,217  | 76.0  | 77.6  | 42.3                              |
| Unknown                                                                                                                                                     | 3                        | 2.4   | 2.3   | 1,084   | 3.9   | 3.5   | 0.0                               |
| Total                                                                                                                                                       | 127                      | 100.0 | 100.0 | 27,900  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 1                        | 14.3  | 5.4   | 94      | 4.2   | 2.1   | 23.4                              |
| Moderate                                                                                                                                                    | 3                        | 42.9  | 10.4  | 468     | 20.9  | 5.3   | 16.3                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 16.3  | 0       | 0.0   | 9.8   | 18.0                              |
| Upper                                                                                                                                                       | 2                        | 28.6  | 57.8  | 1,459   | 65.2  | 69.4  | 42.3                              |
| Unknown                                                                                                                                                     | 1                        | 14.3  | 10.1  | 218     | 9.7   | 13.4  | 0.0                               |
| Total                                                                                                                                                       | 7                        | 100.0 | 100.0 | 2,239   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 23.4                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.5   | 16.3                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 18.0                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.6   | 0       | 0.0   | 1.5   | 42.3                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 98.1  | 0       | 0.0   | 97.2  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table C32**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Dallas-Fort Worth Metropolitan                                                                         |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 963                      | 50.6  | 49.3  | 96,363  | 28.4  | 33.2  | 92.3                     |
| Over \$1 Million                                                                                                        | 628                      | 33.0  |       | 205,242 | 60.5  |       | 6.6                      |
| Revenue Unknown                                                                                                         | 314                      | 16.5  |       | 37,861  | 11.2  |       | 1.1                      |
| Total                                                                                                                   | 1,905                    | 100.0 |       | 339,466 | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 1,118                    | 58.7  | 94.4  | 41,145  | 12.1  | 41.1  |                          |
| \$100,001 - \$250,000                                                                                                   | 362                      | 19.0  | 2.9   | 65,181  | 19.2  | 14.9  |                          |
| \$250,001 - \$1 Million                                                                                                 | 425                      | 22.3  | 2.6   | 233,140 | 68.7  | 44.0  |                          |
| Total                                                                                                                   | 1,905                    | 100.0 | 100.0 | 339,466 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 729                      | 75.7  |       | 24,373  | 25.3  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 138                      | 14.3  |       | 23,606  | 24.5  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 96                       | 10.0  |       | 48,384  | 50.2  |       |                          |
| Total                                                                                                                   | 963                      | 100.0 |       | 96,363  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

Table C33A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Antonio Metropolitan                               |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.7   | 0       | 0.0   | 1.1   | 5.1                          |
| Moderate                                                                | 0                        | 0.0   | 14.3  | 0       | 0.0   | 9.7   | 27.1                         |
| Middle                                                                  | 1                        | 50.0  | 33.1  | 182     | 69.5  | 27.3  | 27.4                         |
| Upper                                                                   | 1                        | 50.0  | 50.9  | 80      | 30.5  | 61.8  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 262     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 2                        | 15.4  | 0.9   | 150     | 7.8   | 0.7   | 5.1                          |
| Moderate                                                                | 2                        | 15.4  | 9.8   | 232     | 12.0  | 6.3   | 27.1                         |
| Middle                                                                  | 2                        | 15.4  | 26.2  | 135     | 7.0   | 20.5  | 27.4                         |
| Upper                                                                   | 7                        | 53.8  | 63.0  | 1,411   | 73.2  | 72.6  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 13                       | 100.0 | 100.0 | 1,928   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 50.0  | 2.3   | 15      | 23.1  | 1.6   | 5.1                          |
| Moderate                                                                | 0                        | 0.0   | 15.7  | 0       | 0.0   | 11.8  | 27.1                         |
| Middle                                                                  | 0                        | 0.0   | 23.2  | 0       | 0.0   | 18.4  | 27.4                         |
| Upper                                                                   | 1                        | 50.0  | 58.9  | 50      | 76.9  | 68.1  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 65      | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 7.6   | 0       | 0.0   | 4.4   | 7.0                          |
| Moderate                                                                | 0                        | 0.0   | 52.2  | 0       | 0.0   | 44.7  | 38.4                         |
| Middle                                                                  | 0                        | 0.0   | 21.7  | 0       | 0.0   | 27.1  | 30.5                         |
| Upper                                                                   | 0                        | 0.0   | 18.5  | 0       | 0.0   | 23.8  | 24.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 3                        | 10.0  | 1.4   | 165     | 3.7   | 1.1   | 5.1                          |
| Moderate                                                                | 7                        | 23.3  | 12.9  | 466     | 10.6  | 10.1  | 27.1                         |
| Middle                                                                  | 4                        | 13.3  | 30.2  | 362     | 8.2   | 24.5  | 27.4                         |
| Upper                                                                   | 16                       | 53.3  | 55.5  | 3,422   | 77.5  | 64.2  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 30                       | 100.0 | 100.0 | 4,415   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |



**Table C33B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Antonio Metropolitan                               |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.7   | 0       | 0.0   | 0.7   | 5.1                          |
| Moderate                                                                | 5                        | 38.5  | 11.3  | 234     | 10.8  | 7.4   | 27.1                         |
| Middle                                                                  | 1                        | 7.7   | 20.7  | 45      | 2.1   | 12.9  | 27.4                         |
| Upper                                                                   | 7                        | 53.8  | 66.3  | 1,881   | 87.1  | 79.0  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 13                       | 100.0 | 100.0 | 2,160   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.4   | 0       | 0.0   | 2.4   | 5.1                          |
| Moderate                                                                | 0                        | 0.0   | 22.9  | 0       | 0.0   | 15.4  | 27.1                         |
| Middle                                                                  | 0                        | 0.0   | 24.5  | 0       | 0.0   | 19.2  | 27.4                         |
| Upper                                                                   | 0                        | 0.0   | 49.2  | 0       | 0.0   | 62.9  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.2   | 0       | 0.0   | 1.1   | 5.1                          |
| Moderate                                                                | 0                        | 0.0   | 23.2  | 0       | 0.0   | 14.9  | 27.1                         |
| Middle                                                                  | 0                        | 0.0   | 40.1  | 0       | 0.0   | 36.5  | 27.4                         |
| Upper                                                                   | 0                        | 0.0   | 34.5  | 0       | 0.0   | 47.5  | 40.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table C34**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                          |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                       | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                       | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                   | 15                       | 9.3   | 4.7   | 2,909   | 9.8   | 6.0   | 5.0                      |
| Moderate                                                                                                              | 43                       | 26.5  | 22.0  | 7,058   | 23.8  | 21.9  | 22.8                     |
| Middle                                                                                                                | 39                       | 24.1  | 27.0  | 7,397   | 24.9  | 28.7  | 28.4                     |
| Upper                                                                                                                 | 64                       | 39.5  | 45.7  | 12,132  | 40.9  | 42.8  | 43.6                     |
| Unknown                                                                                                               | 1                        | 0.6   | 0.3   | 160     | 0.5   | 0.3   | 0.2                      |
| Total                                                                                                                 | 162                      | 100.0 | 100.0 | 29,656  | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C35A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Antonio Metropolitan |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                  | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                  | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                              | 1                        | 50.0  | 3.4   | 182     | 69.5  | 1.8   | 23.8                              |
| Moderate                                                                                                         | 0                        | 0.0   | 17.6  | 0       | 0.0   | 12.4  | 17.6                              |
| Middle                                                                                                           | 0                        | 0.0   | 25.3  | 0       | 0.0   | 22.1  | 19.1                              |
| Upper                                                                                                            | 1                        | 50.0  | 39.8  | 80      | 30.5  | 49.4  | 39.4                              |
| Unknown                                                                                                          | 0                        | 0.0   | 13.8  | 0       | 0.0   | 14.3  | 0.0                               |
| Total                                                                                                            | 2                        | 100.0 | 100.0 | 262     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                  |                          |       |       |         |       |       |                                   |
| Low                                                                                                              | 1                        | 7.7   | 1.9   | 20      | 1.0   | 0.8   | 23.8                              |
| Moderate                                                                                                         | 0                        | 0.0   | 6.3   | 0       | 0.0   | 3.6   | 17.6                              |
| Middle                                                                                                           | 4                        | 30.8  | 12.7  | 407     | 21.1  | 9.1   | 19.1                              |
| Upper                                                                                                            | 8                        | 61.5  | 37.0  | 1,501   | 77.9  | 41.7  | 39.4                              |
| Unknown                                                                                                          | 0                        | 0.0   | 42.0  | 0       | 0.0   | 44.9  | 0.0                               |
| Total                                                                                                            | 13                       | 100.0 | 100.0 | 1,928   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                              | 1                        | 50.0  | 6.1   | 15      | 23.1  | 3.6   | 23.8                              |
| Moderate                                                                                                         | 0                        | 0.0   | 13.2  | 0       | 0.0   | 9.6   | 17.6                              |
| Middle                                                                                                           | 0                        | 0.0   | 18.9  | 0       | 0.0   | 14.9  | 19.1                              |
| Upper                                                                                                            | 1                        | 50.0  | 59.2  | 50      | 76.9  | 69.5  | 39.4                              |
| Unknown                                                                                                          | 0                        | 0.0   | 2.7   | 0       | 0.0   | 2.4   | 0.0                               |
| Total                                                                                                            | 2                        | 100.0 | 100.0 | 65      | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                              | 5                        | 16.7  | 2.7   | 317     | 7.2   | 1.3   | 23.8                              |
| Moderate                                                                                                         | 2                        | 6.7   | 11.7  | 60      | 1.4   | 8.1   | 17.6                              |
| Middle                                                                                                           | 7                        | 23.3  | 18.4  | 703     | 15.9  | 15.7  | 19.1                              |
| Upper                                                                                                            | 15                       | 50.0  | 37.0  | 3,316   | 75.1  | 44.8  | 39.4                              |
| Unknown                                                                                                          | 1                        | 3.3   | 30.2  | 19      | 0.4   | 30.1  | 0.0                               |
| Total                                                                                                            | 30                       | 100.0 | 100.0 | 4,415   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                   |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                          |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                   |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                        |                          |       |       |         |       |       |                                   |

Table C35B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Antonio Metropolitan                                            |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                        | 15.4  | 4.3   | 100     | 4.6   | 4.1   | 23.8                              |
| Moderate                                                                                                                                                    | 2                        | 15.4  | 12.3  | 60      | 2.8   | 7.9   | 17.6                              |
| Middle                                                                                                                                                      | 3                        | 23.1  | 25.0  | 296     | 13.7  | 16.8  | 19.1                              |
| Upper                                                                                                                                                       | 5                        | 38.5  | 54.3  | 1,685   | 78.0  | 69.2  | 39.4                              |
| Unknown                                                                                                                                                     | 1                        | 7.7   | 4.0   | 19      | 0.9   | 2.0   | 0.0                               |
| Total                                                                                                                                                       | 13                       | 100.0 | 100.0 | 2,160   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 8.4   | 0       | 0.0   | 4.2   | 23.8                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 13.2  | 0       | 0.0   | 8.0   | 17.6                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 19.0  | 0       | 0.0   | 12.8  | 19.1                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 48.5  | 0       | 0.0   | 58.9  | 39.4                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 10.9  | 0       | 0.0   | 16.2  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.2   | 23.8                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 17.6                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 19.1                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 39.4                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 98.7  | 0       | 0.0   | 98.7  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table C36**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses<br>Assessment Area: San Antonio Metropolitan  |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | #%    | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 81                       | 50.0  | 35.7  | 9,017   | 30.4  | 23.2  | 92.8                     |
| Over \$1 Million                                                                                                        | 53                       | 32.7  |       | 16,130  | 54.4  |       | 6.3                      |
| Revenue Unknown                                                                                                         | 28                       | 17.3  |       | 4,509   | 15.2  |       | 0.9                      |
| Total                                                                                                                   | 162                      | 100.0 |       | 29,656  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 90                       | 55.6  | 86.8  | 3,219   | 10.9  | 31.1  |                          |
| \$100,001 - \$250,000                                                                                                   | 35                       | 21.6  | 7.6   | 5,735   | 19.3  | 20.6  |                          |
| \$250,001 - \$1 Million                                                                                                 | 37                       | 22.8  | 5.6   | 20,702  | 69.8  | 48.3  |                          |
| Total                                                                                                                   | 162                      | 100.0 | 100.0 | 29,656  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 60                       | 74.1  |       | 1,973   | 21.9  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 13                       | 16.0  |       | 2,159   | 23.9  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 8                        | 9.9   |       | 4,885   | 54.2  |       |                          |
| Total                                                                                                                   | 81                       | 100.0 |       | 9,017   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

APPENDIX D: METROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

Table D1

| 2022 Combined Demographics<br>Assessment Area: Inland Empire MSA                                                        |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 48                        | 4.9                   | 36,200                             | 3.5       | 10,864                                             | 30.0      | 224,678                   | 21.8      |
| Moderate                                                                                                                | 282                       | 28.7                  | 266,208                            | 25.9      | 45,478                                             | 17.1      | 180,300                   | 17.5      |
| Middle                                                                                                                  | 362                       | 36.8                  | 386,945                            | 37.6      | 36,382                                             | 9.4       | 198,334                   | 19.3      |
| Upper                                                                                                                   | 279                       | 28.4                  | 334,365                            | 32.5      | 14,766                                             | 4.4       | 425,997                   | 41.4      |
| Unknown                                                                                                                 | 13                        | 1.3                   | 5,591                              | 0.5       | 754                                                | 13.5      | 0                         | 0.0       |
| Total AA                                                                                                                | 984                       | 100.0                 | 1,029,309                          | 100.0     | 108,244                                            | 10.5      | 1,029,309                 | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 65,594                    | 19,792                | 2.2                                | 30.2      | 36,968                                             | 56.4      | 8,834                     | 13.5      |
| Moderate                                                                                                                | 428,240                   | 189,178               | 21.4                               | 44.2      | 183,228                                            | 42.8      | 55,834                    | 13.0      |
| Middle                                                                                                                  | 592,595                   | 338,093               | 38.3                               | 57.1      | 183,422                                            | 31.0      | 71,080                    | 12.0      |
| Upper                                                                                                                   | 468,619                   | 330,059               | 37.4                               | 70.4      | 87,479                                             | 18.7      | 51,081                    | 10.9      |
| Unknown                                                                                                                 | 11,394                    | 4,911                 | 0.6                                | 43.1      | 3,373                                              | 29.6      | 3,110                     | 27.3      |
| Total AA                                                                                                                | 1,566,442                 | 882,033               | 100.0                              | 56.3      | 494,470                                            | 31.6      | 189,939                   | 12.1      |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 4,845                     | 2.9                   | 4,517                              | 2.9       | 303                                                | 2.9       | 25                        | 2.7       |
| Moderate                                                                                                                | 40,751                    | 24.2                  | 37,489                             | 23.9      | 3,016                                              | 28.8      | 246                       | 26.7      |
| Middle                                                                                                                  | 63,503                    | 37.8                  | 58,987                             | 37.6      | 4,208                                              | 40.2      | 308                       | 33.4      |
| Upper                                                                                                                   | 57,881                    | 34.4                  | 54,730                             | 34.9      | 2,816                                              | 26.9      | 335                       | 36.3      |
| Unknown                                                                                                                 | 1,160                     | 0.7                   | 1,035                              | 0.7       | 116                                                | 1.1       | 9                         | 1.0       |
| Total AA                                                                                                                | 168,140                   | 100.0                 | 156,758                            | 100.0     | 10,459                                             | 100.0     | 923                       | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 93.2      |                                                    | 6.2       |                           | 0.5       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 52                        | 3.5                   | 42                                 | 3.0       | 9                                                  | 10.6      | 1                         | 33.3      |
| Moderate                                                                                                                | 242                       | 16.4                  | 226                                | 16.3      | 16                                                 | 18.8      | 0                         | 0.0       |
| Middle                                                                                                                  | 524                       | 35.5                  | 489                                | 35.2      | 34                                                 | 40.0      | 1                         | 33.3      |
| Upper                                                                                                                   | 644                       | 43.6                  | 622                                | 44.7      | 21                                                 | 24.7      | 1                         | 33.3      |
| Unknown                                                                                                                 | 16                        | 1.1                   | 11                                 | 0.8       | 5                                                  | 5.9       | 0                         | 0.0       |
| Total AA                                                                                                                | 1,478                     | 100.0                 | 1,390                              | 100.0     | 85                                                 | 100.0     | 3                         | 100.0     |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 94.0      |                                                    | 5.8       |                           | 0.2       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table D2

| 2021 Combined Demographics<br>Assessment Area: Inland Empire MSA                                                                                                                          |                           |                                    |                          |                  |                                                    |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 43                        | 5.2                                | 47,381                   | 4.8              | 19,296                                             | 40.7                 | 225,448                   | 23.0      |
| Moderate                                                                                                                                                                                  | 246                       | 29.9                               | 255,969                  | 26.1             | 61,231                                             | 23.9                 | 164,661                   | 16.8      |
| Middle                                                                                                                                                                                    | 301                       | 36.6                               | 348,264                  | 35.6             | 42,631                                             | 12.2                 | 184,676                   | 18.9      |
| Upper                                                                                                                                                                                     | 226                       | 27.5                               | 327,191                  | 33.4             | 17,033                                             | 5.2                  | 404,404                   | 41.3      |
| Unknown                                                                                                                                                                                   | 6                         | 0.7                                | 384                      | 0.0              | 40                                                 | 10.4                 | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 822                       | 100.0                              | 979,189                  | 100.0            | 140,231                                            | 14.3                 | 979,189                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 75,328                    | 21,114                             | 2.6                      | 28.0             | 44,948                                             | 59.7                 | 9,266                     | 12.3      |
| Moderate                                                                                                                                                                                  | 416,192                   | 172,176                            | 21.0                     | 41.4             | 186,837                                            | 44.9                 | 57,179                    | 13.7      |
| Middle                                                                                                                                                                                    | 555,369                   | 305,288                            | 37.2                     | 55.0             | 167,036                                            | 30.1                 | 83,045                    | 15.0      |
| Upper                                                                                                                                                                                     | 472,583                   | 320,458                            | 39.1                     | 67.8             | 94,922                                             | 20.1                 | 57,203                    | 12.1      |
| Unknown                                                                                                                                                                                   | 1,812                     | 617                                | 0.1                      | 34.1             | 161                                                | 8.9                  | 1,034                     | 57.1      |
| Total AA                                                                                                                                                                                  | 1,521,284                 | 819,653                            | 100.0                    | 53.9             | 493,904                                            | 32.5                 | 207,727                   | 13.7      |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 7,164                     | 4.3                                | 6,513                    | 4.2              | 602                                                | 5.8                  | 49                        | 6.0       |
| Moderate                                                                                                                                                                                  | 42,717                    | 25.8                               | 39,104                   | 25.4             | 3,383                                              | 32.4                 | 230                       | 28.1      |
| Middle                                                                                                                                                                                    | 58,091                    | 35.1                               | 54,043                   | 35.1             | 3,793                                              | 36.4                 | 255                       | 31.2      |
| Upper                                                                                                                                                                                     | 57,149                    | 34.6                               | 54,246                   | 35.2             | 2,621                                              | 25.1                 | 282                       | 34.5      |
| Unknown                                                                                                                                                                                   | 156                       | 0.1                                | 126                      | 0.1              | 28                                                 | 0.3                  | 2                         | 0.2       |
| Total AA                                                                                                                                                                                  | 165,277                   | 100.0                              | 154,032                  | 100.0            | 10,427                                             | 100.0                | 818                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    | 93.2                     |                  | 6.3                                                |                      | 0.5                       |           |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 75                        | 5.1                                | 62                       | 4.5              | 12                                                 | 13.2                 | 1                         | 50.0      |
| Moderate                                                                                                                                                                                  | 292                       | 19.7                               | 265                      | 19.1             | 27                                                 | 29.7                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 537                       | 36.2                               | 507                      | 36.5             | 30                                                 | 33.0                 | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 575                       | 38.8                               | 552                      | 39.7             | 22                                                 | 24.2                 | 1                         | 50.0      |
| Unknown                                                                                                                                                                                   | 3                         | 0.2                                | 3                        | 0.2              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,482                     | 100.0                              | 1,389                    | 100.0            | 91                                                 | 100.0                | 2                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    | 93.7                     |                  | 6.1                                                |                      | 0.1                       |           |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |

Table D3

| 2020 Combined Demographics<br>Assessment Area: Inland Empire MSA                                                                                                                          |                           |                                    |                          |                  |                                                    |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 43                        | 5.2                                | 47,381                   | 4.8              | 19,296                                             | 40.7                 | 225,448                   | 23.0      |
| Moderate                                                                                                                                                                                  | 246                       | 29.9                               | 255,969                  | 26.1             | 61,231                                             | 23.9                 | 164,661                   | 16.8      |
| Middle                                                                                                                                                                                    | 301                       | 36.6                               | 348,264                  | 35.6             | 42,631                                             | 12.2                 | 184,676                   | 18.9      |
| Upper                                                                                                                                                                                     | 226                       | 27.5                               | 327,191                  | 33.4             | 17,033                                             | 5.2                  | 404,404                   | 41.3      |
| Unknown                                                                                                                                                                                   | 6                         | 0.7                                | 384                      | 0.0              | 40                                                 | 10.4                 | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 822                       | 100.0                              | 979,189                  | 100.0            | 140,231                                            | 14.3                 | 979,189                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 75,328                    | 21,114                             | 2.6                      | 28.0             | 44,948                                             | 59.7                 | 9,266                     | 12.3      |
| Moderate                                                                                                                                                                                  | 416,192                   | 172,176                            | 21.0                     | 41.4             | 186,837                                            | 44.9                 | 57,179                    | 13.7      |
| Middle                                                                                                                                                                                    | 555,369                   | 305,288                            | 37.2                     | 55.0             | 167,036                                            | 30.1                 | 83,045                    | 15.0      |
| Upper                                                                                                                                                                                     | 472,583                   | 320,458                            | 39.1                     | 67.8             | 94,922                                             | 20.1                 | 57,203                    | 12.1      |
| Unknown                                                                                                                                                                                   | 1,812                     | 617                                | 0.1                      | 34.1             | 161                                                | 8.9                  | 1,034                     | 57.1      |
| Total AA                                                                                                                                                                                  | 1,521,284                 | 819,653                            | 100.0                    | 53.9             | 493,904                                            | 32.5                 | 207,727                   | 13.7      |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 7,224                     | 4.4                                | 6,584                    | 4.3              | 599                                                | 5.7                  | 41                        | 5.3       |
| Moderate                                                                                                                                                                                  | 42,601                    | 25.9                               | 38,960                   | 25.5             | 3,422                                              | 32.3                 | 219                       | 28.3      |
| Middle                                                                                                                                                                                    | 57,711                    | 35.1                               | 53,577                   | 35.0             | 3,890                                              | 36.7                 | 244                       | 31.6      |
| Upper                                                                                                                                                                                     | 56,656                    | 34.5                               | 53,737                   | 35.1             | 2,652                                              | 25.0                 | 267                       | 34.5      |
| Unknown                                                                                                                                                                                   | 160                       | 0.1                                | 132                      | 0.1              | 26                                                 | 0.2                  | 2                         | 0.3       |
| Total AA                                                                                                                                                                                  | 164,352                   | 100.0                              | 152,990                  | 100.0            | 10,589                                             | 100.0                | 773                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    | 93.1                     |                  | 6.4                                                |                      | 0.5                       |           |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 75                        | 5.1                                | 61                       | 4.4              | 13                                                 | 14.1                 | 1                         | 50.0      |
| Moderate                                                                                                                                                                                  | 293                       | 19.7                               | 264                      | 19.0             | 29                                                 | 31.5                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 525                       | 35.4                               | 497                      | 35.8             | 28                                                 | 30.4                 | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 589                       | 39.7                               | 566                      | 40.7             | 22                                                 | 23.9                 | 1                         | 50.0      |
| Unknown                                                                                                                                                                                   | 2                         | 0.1                                | 2                        | 0.1              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,484                     | 100.0                              | 1,390                    | 100.0            | 92                                                 | 100.0                | 2                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    | 93.7                     |                  | 6.2                                                |                      | 0.1                       |           |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |

Table D4A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Inland Empire MSA                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.6   | 0       | 0.0   | 1.8   | 0    | 0.0   | 2.5   | 0       | 0.0   | 1.7   | 2.2                          |
| Moderate                                                                         | 0                                | 0.0   | 20.3  | 0       | 0.0   | 16.6  | 0    | 0.0   | 21.5  | 0       | 0.0   | 17.0  | 21.4                         |
| Middle                                                                           | 2                                | 66.7  | 37.5  | 2,490   | 92.4  | 34.9  | 0    | 0.0   | 39.2  | 0       | 0.0   | 37.1  | 38.3                         |
| Upper                                                                            | 1                                | 33.3  | 39.5  | 206     | 7.6   | 46.6  | 5    | 100.0 | 36.1  | 3,665   | 100.0 | 43.4  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.8   | 0.6                          |
| Total                                                                            | 3                                | 100.0 | 100.0 | 2,696   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 3,665   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.6   | 0       | 0.0   | 1.1   | 0    | 0.0   | 2.0   | 0       | 0.0   | 1.5   | 2.2                          |
| Moderate                                                                         | 1                                | 7.7   | 16.1  | 134     | 2.1   | 12.7  | 4    | 21.1  | 20.4  | 874     | 15.5  | 16.0  | 21.4                         |
| Middle                                                                           | 2                                | 15.4  | 36.0  | 650     | 10.0  | 32.4  | 4    | 21.1  | 39.1  | 931     | 16.6  | 36.2  | 38.3                         |
| Upper                                                                            | 10                               | 76.9  | 46.3  | 5,726   | 88.0  | 53.8  | 11   | 57.9  | 37.8  | 3,819   | 67.9  | 45.5  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.8   | 0.6                          |
| Total                                                                            | 13                               | 100.0 | 100.0 | 6,510   | 100.0 | 100.0 | 19   | 100.0 | 100.0 | 5,624   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.4   | 0    | 0.0   | 1.1   | 0       | 0.0   | 1.0   | 2.2                          |
| Moderate                                                                         | 4                                | 6.3   | 12.8  | 382     | 4.1   | 11.8  | 9    | 9.5   | 11.7  | 1,125   | 8.8   | 10.1  | 21.4                         |
| Middle                                                                           | 18                               | 28.1  | 32.1  | 2,730   | 29.4  | 30.1  | 20   | 21.1  | 33.1  | 2,143   | 16.8  | 29.6  | 38.3                         |
| Upper                                                                            | 42                               | 65.6  | 54.5  | 6,186   | 66.5  | 57.6  | 65   | 68.4  | 53.6  | 9,183   | 72.1  | 58.6  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 1    | 1.1   | 0.6   | 290     | 2.3   | 0.8   | 0.6                          |
| Total                                                                            | 64                               | 100.0 | 100.0 | 9,298   | 100.0 | 100.0 | 95   | 100.0 | 100.0 | 12,741  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 13.0  | 0       | 0.0   | 7.9   | 0    | 0.0   | 13.0  | 0       | 0.0   | 6.4   | 7.9                          |
| Moderate                                                                         | 0                                | 0.0   | 49.6  | 0       | 0.0   | 35.6  | 0    | 0.0   | 46.1  | 0       | 0.0   | 23.8  | 37.2                         |
| Middle                                                                           | 0                                | 0.0   | 29.6  | 0       | 0.0   | 39.4  | 1    | 100.0 | 31.9  | 2,250   | 100.0 | 39.4  | 38.7                         |
| Upper                                                                            | 0                                | 0.0   | 7.8   | 0       | 0.0   | 17.2  | 0    | 0.0   | 8.4   | 0       | 0.0   | 28.9  | 15.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.6   | 0       | 0.0   | 1.6   | 1.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 2,250   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 0                                | 0.0   | 1.9   | 0       | 0.0   | 1.5   | 0    | 0.0   | 2.2   | 0       | 0.0   | 1.8   | 2.2                          |
| Moderate                                                                         | 12                               | 9.9   | 17.4  | 1,900   | 7.5   | 14.6  | 15   | 8.5   | 20.2  | 2,180   | 6.5   | 16.7  | 21.4                         |
| Middle                                                                           | 28                               | 23.1  | 36.3  | 6,710   | 26.6  | 33.4  | 45   | 25.6  | 38.4  | 8,639   | 25.8  | 36.5  | 38.3                         |
| Upper                                                                            | 81                               | 66.9  | 44.3  | 16,658  | 65.9  | 50.4  | 114  | 64.8  | 38.5  | 22,310  | 66.6  | 44.0  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2    | 1.1   | 0.8   | 348     | 1.0   | 0.9   | 0.6                          |
| Total                                                                            | 121                              | 100.0 | 100.0 | 25,268  | 100.0 | 100.0 | 176  | 100.0 | 100.0 | 33,477  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.



**Table D4B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Inland Empire MSA                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.5   | 2.2                          |
| Moderate                                                                         | 6                                | 15.0  | 9.6   | 1,033   | 16.1  | 9.1   | 2    | 3.6   | 11.5  | 181     | 2.0   | 8.2   | 21.4                         |
| Middle                                                                           | 6                                | 15.0  | 30.9  | 840     | 13.1  | 26.0  | 20   | 35.7  | 32.4  | 3,315   | 36.0  | 27.8  | 38.3                         |
| Upper                                                                            | 28                               | 70.0  | 59.1  | 4,540   | 70.8  | 64.6  | 33   | 58.9  | 54.6  | 5,643   | 61.4  | 62.3  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1    | 1.8   | 0.8   | 58      | 0.6   | 1.2   | 0.6                          |
| Total                                                                            | 40                               | 100.0 | 100.0 | 6,413   | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 9,197   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.3   | 0       | 0.0   | 0.6   | 0    | 0.0   | 1.6   | 0       | 0.0   | 1.7   | 2.2                          |
| Moderate                                                                         | 1                                | 100.0 | 16.5  | 351     | 100.0 | 11.3  | 0    | 0.0   | 15.7  | 0       | 0.0   | 10.9  | 21.4                         |
| Middle                                                                           | 0                                | 0.0   | 33.3  | 0       | 0.0   | 28.8  | 0    | 0.0   | 33.2  | 0       | 0.0   | 24.5  | 38.3                         |
| Upper                                                                            | 0                                | 0.0   | 48.8  | 0       | 0.0   | 59.3  | 0    | 0.0   | 48.4  | 0       | 0.0   | 59.2  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.2   | 0       | 0.0   | 3.7   | 0.6                          |
| Total                                                                            | 1                                | 100.0 | 100.0 | 351     | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.4   | 0       | 0.0   | 2.7   | 0    | 0.0   | 3.1   | 0       | 0.0   | 2.4   | 2.2                          |
| Moderate                                                                         | 0                                | 0.0   | 26.1  | 0       | 0.0   | 21.7  | 0    | 0.0   | 29.7  | 0       | 0.0   | 24.4  | 21.4                         |
| Middle                                                                           | 0                                | 0.0   | 42.8  | 0       | 0.0   | 40.6  | 0    | 0.0   | 41.7  | 0       | 0.0   | 41.0  | 38.3                         |
| Upper                                                                            | 0                                | 0.0   | 27.6  | 0       | 0.0   | 34.8  | 0    | 0.0   | 24.8  | 0       | 0.0   | 31.0  | 37.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.7   | 0       | 0.0   | 1.0   | 0.6                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D5A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Inland Empire MSA                                      |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.3   | 0       | 0.0   | 1.5   | 2.6                          |
| Moderate                                                                | 0                        | 0.0   | 19.4  | 0       | 0.0   | 15.2  | 21.0                         |
| Middle                                                                  | 2                        | 40.0  | 37.5  | 1,360   | 53.8  | 34.3  | 37.2                         |
| Upper                                                                   | 3                        | 60.0  | 40.8  | 1,167   | 46.2  | 48.9  | 39.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                   | 5                        | 100.0 | 100.0 | 2,527   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.2   | 0       | 0.0   | 0.8   | 2.6                          |
| Moderate                                                                | 1                        | 5.9   | 13.6  | 48      | 1.3   | 10.7  | 21.0                         |
| Middle                                                                  | 6                        | 35.3  | 34.0  | 888     | 24.9  | 30.6  | 37.2                         |
| Upper                                                                   | 10                       | 58.8  | 51.2  | 2,630   | 73.8  | 57.9  | 39.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 17                       | 100.0 | 100.0 | 3,566   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.0   | 0       | 0.0   | 0.8   | 2.6                          |
| Moderate                                                                | 2                        | 6.5   | 12.7  | 125     | 2.8   | 9.8   | 21.0                         |
| Middle                                                                  | 5                        | 16.1  | 30.8  | 394     | 8.8   | 28.1  | 37.2                         |
| Upper                                                                   | 24                       | 77.4  | 55.5  | 3,940   | 88.4  | 61.3  | 39.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                   | 31                       | 100.0 | 100.0 | 4,459   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 18.2  | 0       | 0.0   | 12.3  | 10.5                         |
| Moderate                                                                | 0                        | 0.0   | 48.7  | 0       | 0.0   | 32.7  | 41.0                         |
| Middle                                                                  | 0                        | 0.0   | 24.5  | 0       | 0.0   | 24.7  | 31.2                         |
| Upper                                                                   | 0                        | 0.0   | 8.5   | 0       | 0.0   | 30.2  | 17.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 1.5   | 0       | 0.0   | 1.3   | 2.6                          |
| Moderate                                                                | 7                        | 8.4   | 15.4  | 711     | 4.4   | 12.7  | 21.0                         |
| Middle                                                                  | 20                       | 24.1  | 35.1  | 3,777   | 23.4  | 31.6  | 37.2                         |
| Upper                                                                   | 56                       | 67.5  | 48.0  | 11,664  | 72.2  | 54.4  | 39.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 83                       | 100.0 | 100.0 | 16,152  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table D5B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Inland Empire MSA                                               |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income Level                                                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.4   | 2.6                          |
| Moderate                                                                                                                                                    | 4                        | 14.3  | 11.7  | 538     | 11.6  | 8.3   | 21.0                         |
| Middle                                                                                                                                                      | 6                        | 21.4  | 28.1  | 785     | 16.9  | 23.7  | 37.2                         |
| Upper                                                                                                                                                       | 18                       | 64.3  | 59.3  | 3,327   | 71.5  | 67.4  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                                                                                                       | 28                       | 100.0 | 100.0 | 4,650   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.0   | 0       | 0.0   | 1.1   | 2.6                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 15.5  | 0       | 0.0   | 9.8   | 21.0                         |
| Middle                                                                                                                                                      | 1                        | 50.0  | 36.7  | 350     | 36.8  | 32.0  | 37.2                         |
| Upper                                                                                                                                                       | 1                        | 50.0  | 45.9  | 600     | 63.2  | 57.1  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 2                        | 100.0 | 100.0 | 950     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.0   | 0       | 0.0   | 2.0   | 2.6                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 23.7  | 0       | 0.0   | 18.1  | 21.0                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 42.3  | 0       | 0.0   | 39.6  | 37.2                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 30.9  | 0       | 0.0   | 40.2  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table D6**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Inland Empire MSA                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income Level                                                                                                                                                                | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 6                                | 7.0   | 3.5   | 501     | 2.4   | 4.3   | 9    | 5.5   | 2.1   | 1,146   | 5.2   | 2.1   | 2.9                      |
| Moderate                                                                                                                                                                                  | 22                               | 25.6  | 23.6  | 6,412   | 31.0  | 28.7  | 40   | 24.2  | 21.3  | 4,820   | 21.8  | 24.5  | 24.2                     |
| Middle                                                                                                                                                                                    | 28                               | 32.6  | 34.2  | 5,183   | 25.0  | 35.1  | 73   | 44.2  | 37.7  | 8,288   | 37.4  | 39.3  | 37.8                     |
| Upper                                                                                                                                                                                     | 30                               | 34.9  | 38.0  | 8,612   | 41.6  | 31.4  | 40   | 24.2  | 37.8  | 7,666   | 34.6  | 33.0  | 34.4                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 3    | 1.8   | 0.6   | 235     | 1.1   | 0.9   | 0.7                      |
| Total                                                                                                                                                                                     | 86                               | 100.0 | 100.0 | 20,708  | 100.0 | 100.0 | 165  | 100.0 | 100.0 | 22,155  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D7

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Inland Empire MSA          |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                     | 6                        | 5.6   | 3.7   | 817     | 2.7   | 4.5   | 4.4                      |
| Moderate                                                                                                                | 22                       | 20.6  | 25.0  | 6,903   | 22.7  | 29.8  | 25.9                     |
| Middle                                                                                                                  | 35                       | 32.7  | 34.1  | 8,399   | 27.6  | 34.8  | 35.1                     |
| Upper                                                                                                                   | 44                       | 41.1  | 36.5  | 14,317  | 47.0  | 30.2  | 34.5                     |
| Unknown                                                                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                      |
| Total                                                                                                                   | 107                      | 100.0 | 100.0 | 30,436  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

Table D8A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Inland Empire MSA                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 1.7   | 0       | 0.0   | 1.1   | 0    | 0.0   | 1.8   | 0       | 0.0   | 1.2   | 21.8                              |
| Moderate                                                                     | 0                                | 0.0   | 7.4   | 0       | 0.0   | 4.6   | 0    | 0.0   | 6.4   | 0       | 0.0   | 3.6   | 17.5                              |
| Middle                                                                       | 0                                | 0.0   | 21.3  | 0       | 0.0   | 18.3  | 1    | 20.0  | 18.9  | 66      | 1.8   | 15.6  | 19.3                              |
| Upper                                                                        | 3                                | 100.0 | 48.6  | 2,696   | 100.0 | 55.2  | 4    | 80.0  | 49.9  | 3,599   | 98.2  | 56.2  | 41.4                              |
| Unknown                                                                      | 0                                | 0.0   | 20.9  | 0       | 0.0   | 20.7  | 0    | 0.0   | 23.1  | 0       | 0.0   | 23.5  | 0.0                               |
| Total                                                                        | 3                                | 100.0 | 100.0 | 2,696   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 3,665   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 3.6   | 0       | 0.0   | 2.2   | 0    | 0.0   | 7.9   | 0       | 0.0   | 5.1   | 21.8                              |
| Moderate                                                                     | 0                                | 0.0   | 10.7  | 0       | 0.0   | 7.5   | 2    | 10.5  | 15.2  | 430     | 7.6   | 11.1  | 17.5                              |
| Middle                                                                       | 1                                | 7.7   | 19.8  | 158     | 2.4   | 17.6  | 5    | 26.3  | 22.9  | 1,003   | 17.8  | 21.3  | 19.3                              |
| Upper                                                                        | 11                               | 84.6  | 42.7  | 4,532   | 69.6  | 48.6  | 12   | 63.2  | 37.2  | 4,191   | 74.5  | 44.4  | 41.4                              |
| Unknown                                                                      | 1                                | 7.7   | 23.1  | 1,820   | 28.0  | 24.1  | 0    | 0.0   | 16.7  | 0       | 0.0   | 18.1  | 0.0                               |
| Total                                                                        | 13                               | 100.0 | 100.0 | 6,510   | 100.0 | 100.0 | 19   | 100.0 | 100.0 | 5,624   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 3.9   | 0       | 0.0   | 2.8   | 1    | 1.1   | 2.6   | 60      | 0.5   | 2.4   | 21.8                              |
| Moderate                                                                     | 1                                | 1.6   | 8.5   | 51      | 0.5   | 6.8   | 4    | 4.2   | 8.2   | 329     | 2.6   | 5.8   | 17.5                              |
| Middle                                                                       | 8                                | 12.5  | 16.3  | 1,000   | 10.8  | 14.7  | 13   | 13.7  | 20.7  | 1,139   | 8.9   | 15.7  | 19.3                              |
| Upper                                                                        | 55                               | 85.9  | 65.1  | 8,247   | 88.7  | 66.6  | 77   | 81.1  | 62.1  | 11,213  | 88.0  | 68.9  | 41.4                              |
| Unknown                                                                      | 0                                | 0.0   | 6.1   | 0       | 0.0   | 9.1   | 0    | 0.0   | 6.5   | 0       | 0.0   | 7.3   | 0.0                               |
| Total                                                                        | 64                               | 100.0 | 100.0 | 9,298   | 100.0 | 100.0 | 95   | 100.0 | 100.0 | 12,741  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 3.0   | 0       | 0.0   | 1.8   | 2    | 1.1   | 4.2   | 80      | 0.3   | 2.6   | 21.8                              |
| Moderate                                                                     | 2                                | 1.7   | 9.6   | 143     | 0.6   | 6.4   | 11   | 6.3   | 9.8   | 1,314   | 4.2   | 6.2   | 17.5                              |
| Middle                                                                       | 14                               | 11.6  | 20.1  | 1,647   | 6.5   | 17.7  | 26   | 14.9  | 20.4  | 2,774   | 8.9   | 17.3  | 19.3                              |
| Upper                                                                        | 104                              | 86.0  | 44.9  | 21,658  | 85.7  | 51.1  | 135  | 77.1  | 46.0  | 26,129  | 83.7  | 52.4  | 41.4                              |
| Unknown                                                                      | 1                                | 0.8   | 22.4  | 1,820   | 7.2   | 23.0  | 1    | 0.6   | 19.6  | 930     | 3.0   | 21.4  | 0.0                               |
| Total                                                                        | 121                              | 100.0 | 100.0 | 25,268  | 100.0 | 100.0 | 175  | 100.0 | 100.0 | 31,227  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table D8B**

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Inland Empire MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                        | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                | 0                                | 0.0   | 4.3   | 0       | 0.0   | 5.0   | 1    | 1.8   | 2.8   | 20      | 0.2   | 3.0   | 21.8                              |
| Moderate                                                                                                           | 1                                | 2.5   | 6.0   | 92      | 1.4   | 3.7   | 5    | 8.9   | 5.7   | 555     | 6.0   | 3.4   | 17.5                              |
| Middle                                                                                                             | 5                                | 12.5  | 13.2  | 489     | 7.6   | 8.7   | 7    | 12.5  | 18.1  | 566     | 6.2   | 12.0  | 19.3                              |
| Upper                                                                                                              | 34                               | 85.0  | 68.4  | 5,832   | 90.9  | 72.1  | 42   | 75.0  | 60.0  | 7,126   | 77.5  | 67.9  | 41.4                              |
| Unknown                                                                                                            | 0                                | 0.0   | 8.2   | 0       | 0.0   | 10.6  | 1    | 1.8   | 13.5  | 930     | 10.1  | 13.7  | 0.0                               |
| Total                                                                                                              | 40                               | 100.0 | 100.0 | 6,413   | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 9,197   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                | 0                                | 0.0   | 6.8   | 0       | 0.0   | 4.4   | 0    | 0.0   | 6.2   | 0       | 0.0   | 4.5   | 21.8                              |
| Moderate                                                                                                           | 0                                | 0.0   | 9.3   | 0       | 0.0   | 4.7   | 0    | 0.0   | 10.1  | 0       | 0.0   | 5.2   | 17.5                              |
| Middle                                                                                                             | 0                                | 0.0   | 15.1  | 0       | 0.0   | 8.4   | 0    | 0.0   | 17.4  | 0       | 0.0   | 8.3   | 19.3                              |
| Upper                                                                                                              | 1                                | 100.0 | 56.0  | 351     | 100.0 | 64.1  | 0    | 0.0   | 55.4  | 0       | 0.0   | 66.3  | 41.4                              |
| Unknown                                                                                                            | 0                                | 0.0   | 12.9  | 0       | 0.0   | 18.5  | 0    | 0.0   | 10.9  | 0       | 0.0   | 15.6  | 0.0                               |
| Total                                                                                                              | 1                                | 100.0 | 100.0 | 351     | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 21.8                              |
| Moderate                                                                                                           | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 17.5                              |
| Middle                                                                                                             | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 19.3                              |
| Upper                                                                                                              | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.4                              |
| Unknown                                                                                                            | 0                                | 0.0   | 99.3  | 0       | 0.0   | 99.6  | 0    | 0.0   | 99.4  | 0       | 0.0   | 99.6  | 0.0                               |
| Total                                                                                                              | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D9A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Inland Empire MSA |                          |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                           | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                                                       | 0                        | 0.0   | 2.0   | 0       | 0.0   | 1.1   | 23.0                              |
| Moderate                                                                                                  | 0                        | 0.0   | 10.3  | 0       | 0.0   | 6.7   | 16.8                              |
| Middle                                                                                                    | 0                        | 0.0   | 24.1  | 0       | 0.0   | 21.0  | 18.9                              |
| Upper                                                                                                     | 4                        | 80.0  | 48.9  | 1,594   | 63.1  | 56.2  | 41.3                              |
| Unknown                                                                                                   | 1                        | 20.0  | 14.6  | 933     | 36.9  | 15.0  | 0.0                               |
| Total                                                                                                     | 5                        | 100.0 | 100.0 | 2,527   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                       | 2                        | 11.8  | 2.8   | 163     | 4.6   | 1.7   | 23.0                              |
| Moderate                                                                                                  | 2                        | 11.8  | 9.3   | 157     | 4.4   | 6.5   | 16.8                              |
| Middle                                                                                                    | 1                        | 5.9   | 17.8  | 241     | 6.8   | 15.6  | 18.9                              |
| Upper                                                                                                     | 11                       | 64.7  | 43.9  | 2,635   | 73.9  | 48.0  | 41.3                              |
| Unknown                                                                                                   | 1                        | 5.9   | 26.2  | 370     | 10.4  | 28.2  | 0.0                               |
| Total                                                                                                     | 17                       | 100.0 | 100.0 | 3,566   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                       | 0                        | 0.0   | 3.6   | 0       | 0.0   | 2.3   | 23.0                              |
| Moderate                                                                                                  | 2                        | 6.5   | 10.0  | 130     | 2.9   | 7.9   | 16.8                              |
| Middle                                                                                                    | 4                        | 12.9  | 18.4  | 170     | 3.8   | 17.4  | 18.9                              |
| Upper                                                                                                     | 25                       | 80.6  | 61.2  | 4,159   | 93.3  | 62.2  | 41.3                              |
| Unknown                                                                                                   | 0                        | 0.0   | 6.7   | 0       | 0.0   | 10.2  | 0.0                               |
| Total                                                                                                     | 31                       | 100.0 | 100.0 | 4,459   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                       | 4                        | 4.8   | 2.6   | 345     | 2.1   | 1.5   | 23.0                              |
| Moderate                                                                                                  | 6                        | 7.2   | 9.5   | 607     | 3.8   | 6.5   | 16.8                              |
| Middle                                                                                                    | 7                        | 8.4   | 19.3  | 593     | 3.7   | 17.1  | 18.9                              |
| Upper                                                                                                     | 64                       | 77.1  | 45.1  | 13,304  | 82.4  | 50.3  | 41.3                              |
| Unknown                                                                                                   | 2                        | 2.4   | 23.6  | 1,303   | 8.1   | 24.6  | 0.0                               |
| Total                                                                                                     | 83                       | 100.0 | 100.0 | 16,152  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                            |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                   |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                            |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                 |                          |       |       |         |       |       |                                   |

Table D9B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Inland Empire MSA                                                   |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                        | 7.1   | 6.2   | 182     | 3.9   | 5.0   | 23.0                              |
| Moderate                                                                                                                                                    | 2                        | 7.1   | 9.3   | 320     | 6.9   | 6.0   | 16.8                              |
| Middle                                                                                                                                                      | 2                        | 7.1   | 16.0  | 182     | 3.9   | 11.1  | 18.9                              |
| Upper                                                                                                                                                       | 22                       | 78.6  | 64.6  | 3,966   | 85.3  | 72.7  | 41.3                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 3.9   | 0       | 0.0   | 5.3   | 0.0                               |
| Total                                                                                                                                                       | 28                       | 100.0 | 100.0 | 4,650   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 6.3   | 0       | 0.0   | 2.8   | 23.0                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 10.2  | 0       | 0.0   | 6.4   | 16.8                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 18.7  | 0       | 0.0   | 9.6   | 18.9                              |
| Upper                                                                                                                                                       | 2                        | 100.0 | 53.1  | 950     | 100.0 | 65.1  | 41.3                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 11.6  | 0       | 0.0   | 16.1  | 0.0                               |
| Total                                                                                                                                                       | 2                        | 100.0 | 100.0 | 950     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 23.0                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 16.8                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.5   | 18.9                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.7   | 0       | 0.0   | 1.1   | 41.3                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 98.4  | 0       | 0.0   | 97.9  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |



**Table D10**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Inland Empire MSA                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 30                               | 34.9  | 46.3  | 3,687   | 17.8  | 23.9  | 114  | 69.1  | 53.1  | 8,025   | 36.2  | 32.0  | 93.2                     |
| Over \$1 Million                                                                   | 33                               | 38.4  |       | 11,327  | 54.7  |       | 37   | 22.4  |       | 12,600  | 56.9  |       | 6.2                      |
| Revenue Unknown                                                                    | 23                               | 26.7  |       | 5,694   | 27.5  |       | 14   | 8.5   |       | 1,530   | 6.9   |       | 0.5                      |
| Total                                                                              | 86                               | 100.0 |       | 20,708  | 100.0 |       | 165  | 100.0 |       | 22,155  | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 44                               | 51.2  | 94.4  | 1,930   | 9.3   | 42.6  | 123  | 74.5  | 96.4  | 6,543   | 29.5  | 52.2  |                          |
| \$100,001 - \$250,000                                                              | 14                               | 16.3  | 3.3   | 2,493   | 12.0  | 17.1  | 19   | 11.5  | 2.2   | 3,009   | 13.6  | 14.7  |                          |
| \$250,001 - \$1 Million                                                            | 28                               | 32.6  | 2.3   | 16,285  | 78.6  | 40.4  | 23   | 13.9  | 1.4   | 12,603  | 56.9  | 33.1  |                          |
| Total                                                                              | 86                               | 100.0 | 100.0 | 20,708  | 100.0 | 100.0 | 165  | 100.0 | 100.0 | 22,155  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 22                               | 73.3  |       | 925     | 25.1  |       | 104  | 91.2  |       | 5,404   | 67.3  |       |                          |
| \$100,001 - \$250,000                                                              | 4                                | 13.3  |       | 679     | 18.4  |       | 8    | 7.0   |       | 1,229   | 15.3  |       |                          |
| \$250,001 - \$1 Million                                                            | 4                                | 13.3  |       | 2,083   | 56.5  |       | 2    | 1.8   |       | 1,392   | 17.3  |       |                          |
| Total                                                                              | 30                               | 100.0 |       | 3,687   | 100.0 |       | 114  | 100.0 |       | 8,025   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D11**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                                                                                                 |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Inland Empire MSA                                                                                                                                                        |                          |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | %     | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                                                                                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                                                                                       | 42                       | 39.3  | 39.4  | 5,266   | 17.3  | 22.4  | 93.1                     |
| Over \$1 Million                                                                                                                                                                          | 53                       | 49.5  |       | 22,041  | 72.4  |       | 6.4                      |
| Revenue Unknown                                                                                                                                                                           | 12                       | 11.2  |       | 3,129   | 10.3  |       | 0.5                      |
| Total                                                                                                                                                                                     | 107                      | 100.0 |       | 30,436  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                                                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 39                       | 36.4  | 90.4  | 1,638   | 5.4   | 38.2  |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 27                       | 25.2  | 5.9   | 4,738   | 15.6  | 20.3  |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 41                       | 38.3  | 3.7   | 24,060  | 79.1  | 41.5  |                          |
| Total                                                                                                                                                                                     | 107                      | 100.0 | 100.0 | 30,436  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 27                       | 64.3  |       | 1,142   | 21.7  |       |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 10                       | 23.8  |       | 1,553   | 29.5  |       |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 5                        | 11.9  |       | 2,571   | 48.8  |       |                          |
| Total                                                                                                                                                                                     | 42                       | 100.0 |       | 5,266   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D12

| 2022 Combined Demographics<br>Assessment Area: San Diego MSA                                                                                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 46                        | 6.2                   | 43,837                             | 5.8       | 10,530                                             | 24.0      | 172,988                   | 22.8      |
| Moderate                                                                                                                                                                                  | 167                       | 22.7                  | 173,346                            | 22.8      | 20,063                                             | 11.6      | 131,098                   | 17.3      |
| Middle                                                                                                                                                                                    | 262                       | 35.5                  | 260,157                            | 34.3      | 15,032                                             | 5.8       | 142,293                   | 18.7      |
| Upper                                                                                                                                                                                     | 248                       | 33.6                  | 279,925                            | 36.9      | 9,275                                              | 3.3       | 313,039                   | 41.2      |
| Unknown                                                                                                                                                                                   | 14                        | 1.9                   | 2,153                              | 0.3       | 144                                                | 6.7       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 737                       | 100.0                 | 759,418                            | 100.0     | 55,044                                             | 7.2       | 759,418                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           |                                                    | Rental    |                           | Vacant    |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 69,718                    | 14,897                | 2.4                                | 21.4      | 51,057                                             | 73.2      | 3,764                     | 5.4       |
| Moderate                                                                                                                                                                                  | 279,122                   | 96,116                | 15.8                               | 34.4      | 164,465                                            | 58.9      | 18,541                    | 6.6       |
| Middle                                                                                                                                                                                    | 437,896                   | 226,716               | 37.2                               | 51.8      | 180,673                                            | 41.3      | 30,507                    | 7.0       |
| Upper                                                                                                                                                                                     | 423,636                   | 270,251               | 44.4                               | 63.8      | 121,644                                            | 28.7      | 31,741                    | 7.5       |
| Unknown                                                                                                                                                                                   | 5,156                     | 1,370                 | 0.2                                | 26.6      | 3,514                                              | 68.2      | 272                       | 5.3       |
| Total AA                                                                                                                                                                                  | 1,215,528                 | 609,350               | 100.0                              | 50.1      | 521,353                                            | 42.9      | 84,825                    | 7.0       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 6,913                     | 3.9                   | 6,407                              | 3.9       | 476                                                | 4.0       | 30                        | 3.1       |
| Moderate                                                                                                                                                                                  | 30,660                    | 17.3                  | 28,623                             | 17.4      | 1,919                                              | 16.3      | 118                       | 12.1      |
| Middle                                                                                                                                                                                    | 61,356                    | 34.6                  | 57,025                             | 34.7      | 4,014                                              | 34.0      | 317                       | 32.4      |
| Upper                                                                                                                                                                                     | 76,901                    | 43.4                  | 71,154                             | 43.3      | 5,246                                              | 44.5      | 501                       | 51.3      |
| Unknown                                                                                                                                                                                   | 1,451                     | 0.8                   | 1,300                              | 0.8       | 140                                                | 1.2       | 11                        | 1.1       |
| Total AA                                                                                                                                                                                  | 177,281                   | 100.0                 | 164,509                            | 100.0     | 11,795                                             | 100.0     | 977                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.8      |                                                    | 6.7       |                           | 0.6       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 25                        | 1.8                   | 24                                 | 1.8       | 1                                                  | 1.6       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 142                       | 10.0                  | 137                                | 10.1      | 5                                                  | 8.2       | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 605                       | 42.6                  | 584                                | 43.0      | 20                                                 | 32.8      | 1                         | 100.0     |
| Upper                                                                                                                                                                                     | 646                       | 45.5                  | 611                                | 45.0      | 35                                                 | 57.4      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 2                         | 0.1                   | 2                                  | 0.1       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 1,420                     | 100.0                 | 1,358                              | 100.0     | 61                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.6      |                                                    | 4.3       |                           | 0.1       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table D13**

| 2021 Combined Demographics<br>Assessment Area: San Diego MSA                                                                                                                              |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 61                        | 9.7                   | 57,401                             | 7.8          | 18,951                                             | 33.0         | 172,423                   | 23.6         |
| Moderate                                                                                                                                                                                  | 142                       | 22.6                  | 158,623                            | 21.7         | 25,027                                             | 15.8         | 123,833                   | 16.9         |
| Middle                                                                                                                                                                                    | 204                       | 32.5                  | 236,551                            | 32.3         | 20,679                                             | 8.7          | 130,363                   | 17.8         |
| Upper                                                                                                                                                                                     | 214                       | 34.1                  | 278,708                            | 38.1         | 13,088                                             | 4.7          | 304,709                   | 41.7         |
| Unknown                                                                                                                                                                                   | 7                         | 1.1                   | 45                                 | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>628</b>                | <b>100.0</b>          | <b>731,328</b>                     | <b>100.0</b> | <b>77,745</b>                                      | <b>10.6</b>  | <b>731,328</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 90,459                    | 16,148                | 2.8                                | 17.9         | 67,684                                             | 74.8         | 6,627                     | 7.3          |
| Moderate                                                                                                                                                                                  | 255,834                   | 87,646                | 15.1                               | 34.3         | 148,426                                            | 58.0         | 19,762                    | 7.7          |
| Middle                                                                                                                                                                                    | 403,508                   | 205,291               | 35.5                               | 50.9         | 168,950                                            | 41.9         | 29,267                    | 7.3          |
| Upper                                                                                                                                                                                     | 430,949                   | 269,968               | 46.6                               | 62.6         | 129,999                                            | 30.2         | 30,982                    | 7.2          |
| Unknown                                                                                                                                                                                   | 56                        | 26                    | 0.0                                | 46.4         | 19                                                 | 33.9         | 11                        | 19.6         |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,180,806</b>          | <b>579,079</b>        | <b>100.0</b>                       | <b>49.0</b>  | <b>515,078</b>                                     | <b>43.6</b>  | <b>86,649</b>             | <b>7.3</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 10,043                    | 5.7                   | 9,265                              | 5.7          | 723                                                | 6.2          | 55                        | 6.2          |
| Moderate                                                                                                                                                                                  | 27,626                    | 15.7                  | 25,765                             | 15.8         | 1,735                                              | 14.8         | 126                       | 14.1         |
| Middle                                                                                                                                                                                    | 61,926                    | 35.2                  | 57,295                             | 35.0         | 4,405                                              | 37.6         | 226                       | 25.3         |
| Upper                                                                                                                                                                                     | 76,429                    | 43.4                  | 71,096                             | 43.5         | 4,850                                              | 41.3         | 483                       | 54.1         |
| Unknown                                                                                                                                                                                   | 142                       | 0.1                   | 122                                | 0.1          | 17                                                 | 0.1          | 3                         | 0.3          |
| <b>Total AA</b>                                                                                                                                                                           | <b>176,166</b>            | <b>100.0</b>          | <b>163,543</b>                     | <b>100.0</b> | <b>11,730</b>                                      | <b>100.0</b> | <b>893</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>92.8</b>  |                                                    | <b>6.7</b>   |                           | <b>0.5</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 15                        | 1.0                   | 15                                 | 1.1          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 190                       | 13.3                  | 185                                | 13.5         | 5                                                  | 8.1          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 514                       | 35.9                  | 493                                | 36.0         | 21                                                 | 33.9         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 712                       | 49.8                  | 676                                | 49.4         | 36                                                 | 58.1         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,431</b>              | <b>100.0</b>          | <b>1,369</b>                       | <b>100.0</b> | <b>62</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>95.7</b>  |                                                    | <b>4.3</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D14**

| 2020 Combined Demographics<br>Assessment Area: San Diego MSA                                                                                                                              |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 61                        | 9.7                   | 57,401                             | 7.8          | 18,951                                             | 33.0         | 172,423                   | 23.6         |
| Moderate                                                                                                                                                                                  | 142                       | 22.6                  | 158,623                            | 21.7         | 25,027                                             | 15.8         | 123,833                   | 16.9         |
| Middle                                                                                                                                                                                    | 204                       | 32.5                  | 236,551                            | 32.3         | 20,679                                             | 8.7          | 130,363                   | 17.8         |
| Upper                                                                                                                                                                                     | 214                       | 34.1                  | 278,708                            | 38.1         | 13,088                                             | 4.7          | 304,709                   | 41.7         |
| Unknown                                                                                                                                                                                   | 7                         | 1.1                   | 45                                 | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>628</b>                | <b>100.0</b>          | <b>731,328</b>                     | <b>100.0</b> | <b>77,745</b>                                      | <b>10.6</b>  | <b>731,328</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 90,459                    | 16,148                | 2.8                                | 17.9         | 67,684                                             | 74.8         | 6,627                     | 7.3          |
| Moderate                                                                                                                                                                                  | 255,834                   | 87,646                | 15.1                               | 34.3         | 148,426                                            | 58.0         | 19,762                    | 7.7          |
| Middle                                                                                                                                                                                    | 403,508                   | 205,291               | 35.5                               | 50.9         | 168,950                                            | 41.9         | 29,267                    | 7.3          |
| Upper                                                                                                                                                                                     | 430,949                   | 269,968               | 46.6                               | 62.6         | 129,999                                            | 30.2         | 30,982                    | 7.2          |
| Unknown                                                                                                                                                                                   | 56                        | 26                    | 0.0                                | 46.4         | 19                                                 | 33.9         | 11                        | 19.6         |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,180,806</b>          | <b>579,079</b>        | <b>100.0</b>                       | <b>49.0</b>  | <b>515,078</b>                                     | <b>43.6</b>  | <b>86,649</b>             | <b>7.3</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 10,142                    | 5.7                   | 9,361                              | 5.7          | 730                                                | 6.1          | 51                        | 5.9          |
| Moderate                                                                                                                                                                                  | 27,821                    | 15.6                  | 25,929                             | 15.7         | 1,772                                              | 14.7         | 120                       | 14.0         |
| Middle                                                                                                                                                                                    | 62,744                    | 35.3                  | 58,004                             | 35.2         | 4,516                                              | 37.5         | 224                       | 26.0         |
| Upper                                                                                                                                                                                     | 76,962                    | 43.3                  | 71,499                             | 43.4         | 4,999                                              | 41.5         | 464                       | 54.0         |
| Unknown                                                                                                                                                                                   | 145                       | 0.1                   | 128                                | 0.1          | 16                                                 | 0.1          | 1                         | 0.1          |
| <b>Total AA</b>                                                                                                                                                                           | <b>177,814</b>            | <b>100.0</b>          | <b>164,921</b>                     | <b>100.0</b> | <b>12,033</b>                                      | <b>100.0</b> | <b>860</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.7         |                                                    | 6.8          |                           | 0.5          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 18                        | 1.2                   | 18                                 | 1.3          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 202                       | 13.5                  | 194                                | 13.5         | 8                                                  | 12.7         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 537                       | 35.9                  | 514                                | 35.8         | 23                                                 | 36.5         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 740                       | 49.4                  | 708                                | 49.4         | 32                                                 | 50.8         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,497</b>              | <b>100.0</b>          | <b>1,434</b>                       | <b>100.0</b> | <b>63</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.8         |                                                    | 4.2          |                           | 0.0          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D15A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Diego MSA                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.4   | 0       | 0.0   | 2.5   | 0    | 0.0   | 2.6   | 0       | 0.0   | 1.7   | 2.4                          |
| Moderate                                                                         | 0                                | 0.0   | 16.4  | 0       | 0.0   | 12.1  | 1    | 9.1   | 16.5  | 287     | 5.8   | 12.1  | 15.8                         |
| Middle                                                                           | 2                                | 22.2  | 35.0  | 436     | 4.6   | 31.1  | 2    | 18.2  | 38.9  | 462     | 9.3   | 33.9  | 37.2                         |
| Upper                                                                            | 7                                | 77.8  | 45.2  | 8,941   | 95.4  | 54.3  | 8    | 72.7  | 41.8  | 4,197   | 84.9  | 52.1  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.2                          |
| Total                                                                            | 9                                | 100.0 | 100.0 | 9,377   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 4,946   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.6   | 0       | 0.0   | 2.0   | 0    | 0.0   | 2.5   | 0       | 0.0   | 1.7   | 2.4                          |
| Moderate                                                                         | 2                                | 4.3   | 13.6  | 390     | 2.3   | 10.6  | 4    | 7.0   | 16.4  | 679     | 2.9   | 12.2  | 15.8                         |
| Middle                                                                           | 13                               | 27.7  | 33.9  | 5,297   | 30.9  | 30.3  | 14   | 24.6  | 37.4  | 4,888   | 21.1  | 32.4  | 37.2                         |
| Upper                                                                            | 32                               | 68.1  | 49.8  | 11,441  | 66.8  | 57.2  | 39   | 68.4  | 43.4  | 17,590  | 76.0  | 53.5  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.2                          |
| Total                                                                            | 47                               | 100.0 | 100.0 | 17,128  | 100.0 | 100.0 | 57   | 100.0 | 100.0 | 23,157  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 1                                | 0.5   | 1.8   | 136     | 0.3   | 1.6   | 1    | 0.4   | 1.3   | 118     | 0.2   | 0.8   | 2.4                          |
| Moderate                                                                         | 8                                | 4.1   | 9.7   | 1,047   | 2.6   | 8.4   | 20   | 8.4   | 10.9  | 2,948   | 5.7   | 7.9   | 15.8                         |
| Middle                                                                           | 66                               | 33.5  | 31.8  | 10,093  | 25.0  | 27.0  | 80   | 33.8  | 36.5  | 15,024  | 29.2  | 29.5  | 37.2                         |
| Upper                                                                            | 122                              | 61.9  | 56.7  | 29,030  | 72.0  | 63.0  | 136  | 57.4  | 51.1  | 33,333  | 64.8  | 61.7  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.2                          |
| Total                                                                            | 197                              | 100.0 | 100.0 | 40,306  | 100.0 | 100.0 | 237  | 100.0 | 100.0 | 51,423  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 23.1  | 0       | 0.0   | 12.2  | 0    | 0.0   | 13.5  | 0       | 0.0   | 8.2   | 10.1                         |
| Moderate                                                                         | 0                                | 0.0   | 32.3  | 0       | 0.0   | 29.0  | 0    | 0.0   | 39.2  | 0       | 0.0   | 34.7  | 29.1                         |
| Middle                                                                           | 0                                | 0.0   | 31.9  | 0       | 0.0   | 34.0  | 0    | 0.0   | 32.5  | 0       | 0.0   | 35.0  | 35.0                         |
| Upper                                                                            | 0                                | 0.0   | 12.7  | 0       | 0.0   | 24.7  | 0    | 0.0   | 13.3  | 0       | 0.0   | 20.4  | 25.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.5   | 0       | 0.0   | 1.8   | 0.9                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 4                                | 1.2   | 2.8   | 670     | 0.8   | 2.7   | 1    | 0.3   | 2.4   | 118     | 0.1   | 2.1   | 2.4                          |
| Moderate                                                                         | 12                               | 3.5   | 14.2  | 1,906   | 2.1   | 11.9  | 32   | 8.7   | 15.7  | 4,488   | 4.8   | 13.4  | 15.8                         |
| Middle                                                                           | 104                              | 30.7  | 34.0  | 19,613  | 22.1  | 30.5  | 115  | 31.3  | 37.6  | 23,253  | 25.0  | 32.8  | 37.2                         |
| Upper                                                                            | 219                              | 64.6  | 49.0  | 66,748  | 75.1  | 54.9  | 219  | 59.7  | 44.1  | 65,276  | 70.1  | 51.3  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0.2                          |
| Total                                                                            | 339                              | 100.0 | 100.0 | 88,937  | 100.0 | 100.0 | 367  | 100.0 | 100.0 | 93,135  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D15B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Diego MSA                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 3                                | 3.6   | 1.0   | 534     | 2.9   | 0.5   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.5   | 2.4                          |
| Moderate                                                                         | 2                                | 2.4   | 9.6   | 469     | 2.6   | 5.6   | 7    | 11.3  | 11.5  | 574     | 4.2   | 6.9   | 15.8                         |
| Middle                                                                           | 23                               | 27.4  | 29.3  | 3,787   | 20.7  | 20.6  | 19   | 30.6  | 32.1  | 2,879   | 21.2  | 23.5  | 37.2                         |
| Upper                                                                            | 56                               | 66.7  | 60.1  | 13,536  | 73.9  | 73.3  | 36   | 58.1  | 55.1  | 10,156  | 74.6  | 68.8  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0.2                          |
| Total                                                                            | 84                               | 100.0 | 100.0 | 18,326  | 100.0 | 100.0 | 62   | 100.0 | 100.0 | 13,609  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.1   | 0       | 0.0   | 0.9   | 0    | 0.0   | 1.4   | 0       | 0.0   | 0.4   | 2.4                          |
| Moderate                                                                         | 0                                | 0.0   | 9.0   | 0       | 0.0   | 3.9   | 0    | 0.0   | 11.0  | 0       | 0.0   | 4.1   | 15.8                         |
| Middle                                                                           | 0                                | 0.0   | 31.7  | 0       | 0.0   | 17.6  | 0    | 0.0   | 35.8  | 0       | 0.0   | 16.0  | 37.2                         |
| Upper                                                                            | 2                                | 100.0 | 57.3  | 3,800   | 100.0 | 77.6  | 0    | 0.0   | 51.3  | 0       | 0.0   | 79.1  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 0.2                          |
| Total                                                                            | 2                                | 100.0 | 100.0 | 3,800   | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 4.2   | 0       | 0.0   | 3.3   | 0    | 0.0   | 2.8   | 0       | 0.0   | 2.4   | 2.4                          |
| Moderate                                                                         | 0                                | 0.0   | 22.1  | 0       | 0.0   | 18.2  | 0    | 0.0   | 22.9  | 0       | 0.0   | 17.3  | 15.8                         |
| Middle                                                                           | 0                                | 0.0   | 37.3  | 0       | 0.0   | 34.6  | 0    | 0.0   | 39.1  | 0       | 0.0   | 39.3  | 37.2                         |
| Upper                                                                            | 0                                | 0.0   | 36.4  | 0       | 0.0   | 43.9  | 0    | 0.0   | 35.2  | 0       | 0.0   | 41.0  | 44.4                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D16A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Diego MSA                                          |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 10.0  | 3.3   | 150     | 2.3   | 2.4   | 2.8                          |
| Moderate                                                                | 0                        | 0.0   | 16.0  | 0       | 0.0   | 11.8  | 15.1                         |
| Middle                                                                  | 4                        | 40.0  | 34.9  | 2,618   | 40.7  | 31.4  | 35.5                         |
| Upper                                                                   | 5                        | 50.0  | 45.7  | 3,657   | 56.9  | 54.4  | 46.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 10                       | 100.0 | 100.0 | 6,425   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.2   | 0       | 0.0   | 1.8   | 2.8                          |
| Moderate                                                                | 2                        | 3.5   | 12.5  | 491     | 1.6   | 10.1  | 15.1                         |
| Middle                                                                  | 8                        | 14.0  | 34.0  | 2,445   | 7.8   | 31.1  | 35.5                         |
| Upper                                                                   | 47                       | 82.5  | 51.3  | 28,386  | 90.6  | 57.1  | 46.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 57                       | 100.0 | 100.0 | 31,322  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 3                        | 2.3   | 2.0   | 427     | 1.8   | 1.8   | 2.8                          |
| Moderate                                                                | 15                       | 11.5  | 10.0  | 1,915   | 8.3   | 8.1   | 15.1                         |
| Middle                                                                  | 41                       | 31.5  | 31.2  | 6,351   | 27.5  | 28.8  | 35.5                         |
| Upper                                                                   | 71                       | 54.6  | 56.8  | 14,425  | 62.4  | 61.3  | 46.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 130                      | 100.0 | 100.0 | 23,118  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 24.1  | 0       | 0.0   | 19.5  | 13.0                         |
| Moderate                                                                | 1                        | 50.0  | 35.2  | 150     | 12.0  | 32.4  | 26.4                         |
| Middle                                                                  | 0                        | 0.0   | 28.3  | 0       | 0.0   | 31.0  | 34.3                         |
| Upper                                                                   | 1                        | 50.0  | 12.3  | 1,100   | 88.0  | 17.1  | 26.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 1,250   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 6                        | 2.4   | 2.5   | 861     | 1.2   | 2.6   | 2.8                          |
| Moderate                                                                | 19                       | 7.5   | 13.2  | 2,688   | 3.7   | 11.3  | 15.1                         |
| Middle                                                                  | 68                       | 26.7  | 34.1  | 14,138  | 19.3  | 31.1  | 35.5                         |
| Upper                                                                   | 162                      | 63.5  | 50.3  | 55,724  | 75.9  | 55.1  | 46.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 255                      | 100.0 | 100.0 | 73,411  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D16B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Diego MSA                                                   |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income Level                                                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 2                        | 3.6   | 1.4   | 284     | 2.6   | 1.0   | 2.8                          |
| Moderate                                                                                                                                                    | 1                        | 1.8   | 7.7   | 132     | 1.2   | 4.9   | 15.1                         |
| Middle                                                                                                                                                      | 14                       | 25.5  | 30.3  | 2,424   | 22.0  | 23.5  | 35.5                         |
| Upper                                                                                                                                                       | 38                       | 69.1  | 60.7  | 8,156   | 74.2  | 70.6  | 46.6                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 55                       | 100.0 | 100.0 | 10,996  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.1   | 0       | 0.0   | 0.9   | 2.8                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 10.1  | 0       | 0.0   | 3.6   | 15.1                         |
| Middle                                                                                                                                                      | 1                        | 100.0 | 32.8  | 300     | 100.0 | 20.7  | 35.5                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 55.0  | 0       | 0.0   | 74.8  | 46.6                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 1                        | 100.0 | 100.0 | 300     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.7   | 0       | 0.0   | 3.0   | 2.8                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 18.0  | 0       | 0.0   | 13.0  | 15.1                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 36.3  | 0       | 0.0   | 33.0  | 35.5                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 41.0  | 0       | 0.0   | 50.9  | 46.6                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

Table D17

Table D-1

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: San Diego MSA                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income Level                                                                                                                                                                | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 21                               | 8.8   | 5.2   | 2,104   | 4.5   | 5.2   | 3    | 2.3   | 3.4   | 641     | 2.2   | 3.9   | 3.9                      |
| Moderate                                                                                                                                                                                  | 36                               | 15.1  | 14.2  | 3,297   | 7.1   | 13.8  | 26   | 20.3  | 16.6  | 5,948   | 20.0  | 16.2  | 17.3                     |
| Middle                                                                                                                                                                                    | 88                               | 37.0  | 34.3  | 24,281  | 52.1  | 35.9  | 51   | 39.8  | 34.0  | 11,685  | 39.4  | 33.4  | 34.6                     |
| Upper                                                                                                                                                                                     | 93                               | 39.1  | 45.6  | 16,937  | 36.3  | 44.8  | 48   | 37.5  | 44.7  | 11,394  | 38.4  | 45.4  | 43.4                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.7   | 0       | 0.0   | 1.0   | 0.8                      |
| Total                                                                                                                                                                                     | 238                              | 100.0 | 100.0 | 46,619  | 100.0 | 100.0 | 128  | 100.0 | 100.0 | 29,668  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |



**Table D18**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: San Diego MSA                                                                                |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| <b>Low</b>                                                                                                                                                                                | 39                       | 10.7  | 5.1   | 3,894   | 7.3   | 5.2   | 5.7                      |
| <b>Moderate</b>                                                                                                                                                                           | 58                       | 16.0  | 14.0  | 4,971   | 9.3   | 13.4  | 15.6                     |
| <b>Middle</b>                                                                                                                                                                             | 136                      | 37.5  | 34.5  | 27,283  | 50.8  | 36.9  | 35.3                     |
| <b>Upper</b>                                                                                                                                                                              | 130                      | 35.8  | 45.7  | 17,551  | 32.7  | 43.7  | 43.3                     |
| <b>Unknown</b>                                                                                                                                                                            | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 0.1                      |
| <b>Total</b>                                                                                                                                                                              | 363                      | 100.0 | 100.0 | 53,699  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table 19A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: San Diego MSA                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 1                                | 11.1  | 1.1   | 186     | 2.0   | 0.5   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.4   | 22.8                              |
| Moderate                                                                     | 0                                | 0.0   | 7.1   | 0       | 0.0   | 3.7   | 0    | 0.0   | 6.0   | 0       | 0.0   | 2.9   | 17.3                              |
| Middle                                                                       | 0                                | 0.0   | 19.1  | 0       | 0.0   | 14.2  | 1    | 9.1   | 17.2  | 362     | 7.3   | 11.8  | 18.7                              |
| Upper                                                                        | 8                                | 88.9  | 57.7  | 9,191   | 98.0  | 67.1  | 10   | 90.9  | 59.6  | 4,584   | 92.7  | 66.5  | 41.2                              |
| Unknown                                                                      | 0                                | 0.0   | 14.9  | 0       | 0.0   | 14.4  | 0    | 0.0   | 16.3  | 0       | 0.0   | 18.4  | 0.0                               |
| Total                                                                        | 9                                | 100.0 | 100.0 | 9,377   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 4,946   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 3.7   | 0       | 0.0   | 2.3   | 1    | 1.8   | 8.7   | 238     | 1.0   | 5.8   | 22.8                              |
| Moderate                                                                     | 3                                | 6.4   | 10.3  | 585     | 3.4   | 6.5   | 3    | 5.3   | 12.8  | 671     | 2.9   | 8.0   | 17.3                              |
| Middle                                                                       | 8                                | 17.0  | 18.5  | 2,672   | 15.6  | 15.0  | 5    | 8.8   | 20.1  | 910     | 3.9   | 15.8  | 18.7                              |
| Upper                                                                        | 34                               | 72.3  | 46.7  | 12,459  | 72.7  | 54.4  | 47   | 82.5  | 43.8  | 18,158  | 78.4  | 54.3  | 41.2                              |
| Unknown                                                                      | 2                                | 4.3   | 20.7  | 1,412   | 8.2   | 21.8  | 1    | 1.8   | 14.6  | 3,180   | 13.7  | 16.0  | 0.0                               |
| Total                                                                        | 47                               | 100.0 | 100.0 | 17,128  | 100.0 | 100.0 | 57   | 100.0 | 100.0 | 23,157  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 3.1   | 0       | 0.0   | 2.6   | 2    | 0.8   | 2.9   | 238     | 0.5   | 2.7   | 22.8                              |
| Moderate                                                                     | 4                                | 2.0   | 6.8   | 470     | 1.2   | 4.6   | 14   | 5.9   | 7.9   | 1,422   | 2.8   | 4.7   | 17.3                              |
| Middle                                                                       | 26                               | 13.2  | 15.9  | 2,802   | 7.0   | 12.0  | 28   | 11.8  | 21.0  | 4,521   | 8.8   | 14.0  | 18.7                              |
| Upper                                                                        | 163                              | 82.7  | 70.1  | 36,001  | 89.3  | 74.3  | 190  | 80.2  | 63.7  | 44,720  | 87.0  | 73.1  | 41.2                              |
| Unknown                                                                      | 4                                | 2.0   | 4.2   | 1,033   | 2.6   | 6.4   | 3    | 1.3   | 4.6   | 522     | 1.0   | 5.6   | 0.0                               |
| Total                                                                        | 197                              | 100.0 | 100.0 | 40,306  | 100.0 | 100.0 | 237  | 100.0 | 100.0 | 51,423  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 3                                | 0.9   | 3.1   | 481     | 0.5   | 1.8   | 3    | 0.8   | 4.4   | 476     | 0.5   | 2.6   | 22.8                              |
| Moderate                                                                     | 13                               | 3.8   | 9.4   | 1,720   | 1.9   | 5.6   | 23   | 6.3   | 8.9   | 2,298   | 2.5   | 4.8   | 17.3                              |
| Middle                                                                       | 44                               | 13.0  | 18.5  | 7,014   | 7.9   | 14.6  | 40   | 10.9  | 18.7  | 6,254   | 6.7   | 13.1  | 18.7                              |
| Upper                                                                        | 271                              | 79.9  | 50.1  | 75,102  | 84.4  | 58.6  | 297  | 80.9  | 54.0  | 80,405  | 86.3  | 62.5  | 41.2                              |
| Unknown                                                                      | 8                                | 2.4   | 18.8  | 4,620   | 5.2   | 19.4  | 4    | 1.1   | 14.0  | 3,702   | 4.0   | 17.0  | 0.0                               |
| Total                                                                        | 339                              | 100.0 | 100.0 | 88,937  | 100.0 | 100.0 | 367  | 100.0 | 100.0 | 93,135  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D19B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: San Diego MSA                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 2.4   | 2.5   | 295     | 1.6   | 3.4   | 0    | 0.0   | 2.7   | 0       | 0.0   | 2.7   | 22.8                              |
| Moderate                                                                     | 6                                | 7.1   | 7.0   | 665     | 3.6   | 3.7   | 6    | 9.7   | 6.5   | 205     | 1.5   | 2.9   | 17.3                              |
| Middle                                                                       | 10                               | 11.9  | 15.7  | 1,540   | 8.4   | 8.8   | 6    | 9.7   | 16.1  | 461     | 3.4   | 8.9   | 18.7                              |
| Upper                                                                        | 65                               | 77.4  | 70.5  | 15,451  | 84.3  | 79.3  | 50   | 80.6  | 63.7  | 12,943  | 95.1  | 76.1  | 41.2                              |
| Unknown                                                                      | 1                                | 1.2   | 4.3   | 375     | 2.0   | 4.7   | 0    | 0.0   | 11.1  | 0       | 0.0   | 9.4   | 0.0                               |
| Total                                                                        | 84                               | 100.0 | 100.0 | 18,326  | 100.0 | 100.0 | 62   | 100.0 | 100.0 | 13,609  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 5.0   | 0       | 0.0   | 2.6   | 0    | 0.0   | 5.9   | 0       | 0.0   | 3.8   | 22.8                              |
| Moderate                                                                     | 0                                | 0.0   | 8.6   | 0       | 0.0   | 3.8   | 0    | 0.0   | 9.7   | 0       | 0.0   | 3.3   | 17.3                              |
| Middle                                                                       | 0                                | 0.0   | 13.4  | 0       | 0.0   | 6.2   | 0    | 0.0   | 17.1  | 0       | 0.0   | 5.4   | 18.7                              |
| Upper                                                                        | 1                                | 50.0  | 63.7  | 2,000   | 52.6  | 67.8  | 0    | 0.0   | 58.2  | 0       | 0.0   | 68.7  | 41.2                              |
| Unknown                                                                      | 1                                | 50.0  | 9.3   | 1,800   | 47.4  | 19.5  | 0    | 0.0   | 9.0   | 0       | 0.0   | 18.7  | 0.0                               |
| Total                                                                        | 2                                | 100.0 | 100.0 | 3,800   | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.3   | 22.8                              |
| Moderate                                                                     | 0                                | 0.0   | 1.2   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.3                              |
| Middle                                                                       | 0                                | 0.0   | 1.0   | 0       | 0.0   | 0.7   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.9   | 18.7                              |
| Upper                                                                        | 0                                | 0.0   | 1.5   | 0       | 0.0   | 2.1   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.2                              |
| Unknown                                                                      | 0                                | 0.0   | 96.1  | 0       | 0.0   | 96.6  | 0    | 0.0   | 97.2  | 0       | 0.0   | 98.7  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D20A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Diego MSA                                                                                                                                    |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 1.3   | 0       | 0.0   | 0.6   | 23.6                              |
| Moderate                                                                                                                                                                                                                                 | 1                        | 10.0  | 8.8   | 150     | 2.3   | 5.0   | 16.9                              |
| Middle                                                                                                                                                                                                                                   | 0                        | 0.0   | 23.2  | 0       | 0.0   | 18.1  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 9                        | 90.0  | 56.7  | 6,275   | 97.7  | 66.4  | 41.7                              |
| Unknown                                                                                                                                                                                                                                  | 0                        | 0.0   | 10.0  | 0       | 0.0   | 9.8   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 10                       | 100.0 | 100.0 | 6,425   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 1                        | 1.8   | 2.5   | 156     | 0.5   | 1.5   | 23.6                              |
| Moderate                                                                                                                                                                                                                                 | 2                        | 3.5   | 8.7   | 566     | 1.8   | 5.7   | 16.9                              |
| Middle                                                                                                                                                                                                                                   | 5                        | 8.8   | 18.5  | 1,273   | 4.1   | 15.3  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 45                       | 78.9  | 47.7  | 23,806  | 76.0  | 53.4  | 41.7                              |
| Unknown                                                                                                                                                                                                                                  | 4                        | 7.0   | 22.5  | 5,521   | 17.6  | 24.1  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 57                       | 100.0 | 100.0 | 31,322  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 1                        | 0.8   | 2.9   | 120     | 0.5   | 1.9   | 23.6                              |
| Moderate                                                                                                                                                                                                                                 | 1                        | 0.8   | 8.3   | 265     | 1.1   | 6.2   | 16.9                              |
| Middle                                                                                                                                                                                                                                   | 18                       | 13.8  | 18.9  | 2,782   | 12.0  | 17.5  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 108                      | 83.1  | 64.5  | 19,810  | 85.7  | 64.5  | 41.7                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 1.5   | 5.3   | 141     | 0.6   | 9.8   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 130                      | 100.0 | 100.0 | 23,118  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 3                        | 1.2   | 2.3   | 332     | 0.5   | 1.3   | 23.6                              |
| Moderate                                                                                                                                                                                                                                 | 5                        | 2.0   | 8.7   | 1,081   | 1.5   | 5.5   | 16.9                              |
| Middle                                                                                                                                                                                                                                   | 31                       | 12.3  | 19.3  | 5,159   | 7.1   | 15.8  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 208                      | 82.2  | 49.8  | 59,927  | 83.0  | 56.4  | 41.7                              |
| Unknown                                                                                                                                                                                                                                  | 6                        | 2.4   | 20.0  | 5,662   | 7.8   | 20.9  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 253                      | 100.0 | 100.0 | 72,161  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table D20B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Diego MSA                                                       |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 1                        | 1.8   | 3.7   | 56      | 0.5   | 3.8   | 23.6                              |
| Moderate                                                                                                                                                    | 1                        | 1.8   | 7.2   | 100     | 0.9   | 4.4   | 16.9                              |
| Middle                                                                                                                                                      | 8                        | 14.5  | 17.2  | 1,104   | 10.0  | 11.8  | 17.8                              |
| Upper                                                                                                                                                       | 45                       | 81.8  | 69.6  | 9,736   | 88.5  | 76.7  | 41.7                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 2.3   | 0       | 0.0   | 3.3   | 0.0                               |
| Total                                                                                                                                                       | 55                       | 100.0 | 100.0 | 10,996  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.9   | 0       | 0.0   | 2.4   | 23.6                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 9.6   | 0       | 0.0   | 3.6   | 16.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 19.9  | 0       | 0.0   | 8.1   | 17.8                              |
| Upper                                                                                                                                                       | 1                        | 100.0 | 58.5  | 300     | 100.0 | 69.5  | 41.7                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 7.1   | 0       | 0.0   | 16.3  | 0.0                               |
| Total                                                                                                                                                       | 1                        | 100.0 | 100.0 | 300     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 23.6                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 16.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 17.8                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.8   | 0       | 0.0   | 1.5   | 41.7                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 97.9  | 0       | 0.0   | 97.6  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table D21**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Diego MSA                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 106                              | 44.5  | 46.5  | 12,201  | 26.2  | 25.1  | 50   | 39.1  | 52.3  | 5,574   | 18.8  | 31.4  | 92.8                     |
| Over \$1 Million                                                                                                        | 84                               | 35.3  |       | 30,719  | 65.9  |       | 67   | 52.3  |       | 22,707  | 76.5  |       | 6.7                      |
| Revenue Unknown                                                                                                         | 48                               | 20.2  |       | 3,699   | 7.9   |       | 11   | 8.6   |       | 1,387   | 4.7   |       | 0.6                      |
| Total                                                                                                                   | 238                              | 100.0 |       | 46,619  | 100.0 |       | 128  | 100.0 |       | 29,668  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 134                              | 56.3  | 93.4  | 5,236   | 11.2  | 40.1  | 64   | 50.0  | 96.0  | 3,329   | 11.2  | 50.0  |                          |
| \$100,001 - \$250,000                                                                                                   | 48                               | 20.2  | 3.8   | 8,326   | 17.9  | 17.9  | 30   | 23.4  | 2.4   | 5,958   | 20.1  | 15.2  |                          |
| \$250,001 - \$1 Million                                                                                                 | 56                               | 23.5  | 2.8   | 33,057  | 70.9  | 42.0  | 34   | 26.6  | 1.7   | 20,381  | 68.7  | 34.8  |                          |
| Total                                                                                                                   | 238                              | 100.0 | 100.0 | 46,619  | 100.0 | 100.0 | 128  | 100.0 | 100.0 | 29,668  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 72                               | 67.9  |       | 2,718   | 22.3  |       | 37   | 74.0  |       | 1,735   | 31.1  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 23                               | 21.7  |       | 3,940   | 32.3  |       | 11   | 22.0  |       | 2,263   | 40.6  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 11                               | 10.4  |       | 5,543   | 45.4  |       | 2    | 4.0   |       | 1,576   | 28.3  |       |                          |
| Total                                                                                                                   | 106                              | 100.0 |       | 12,201  | 100.0 |       | 50   | 100.0 |       | 5,574   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D22**

Table 2.11

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Diego MSA                                                                                          |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 200                      | 55.1  | 41.1  | 15,772  | 29.4  | 24.7  | 92.7                     |
| Over \$1 Million                                                                                                        | 95                       | 26.2  |       | 32,447  | 60.4  |       | 6.8                      |
| Revenue Unknown                                                                                                         | 68                       | 18.7  |       | 5,480   | 10.2  |       | 0.5                      |
| Total                                                                                                                   | 363                      | 100.0 |       | 53,699  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 233                      | 64.2  | 89.7  | 7,466   | 13.9  | 37.9  |                          |
| \$100,001 - \$250,000                                                                                                   | 69                       | 19.0  | 6.3   | 12,544  | 23.4  | 20.7  |                          |
| \$250,001 - \$1 Million                                                                                                 | 61                       | 16.8  | 4.0   | 33,689  | 62.7  | 41.5  |                          |
| Total                                                                                                                   | 363                      | 100.0 | 100.0 | 53,699  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 153                      | 76.5  |       | 4,372   | 27.7  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 36                       | 18.0  |       | 6,302   | 40.0  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 11                       | 5.5   |       | 5,098   | 32.3  |       |                          |
| Total                                                                                                                   | 200                      | 100.0 |       | 15,772  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

Table D23

| 2022 Combined Demographics<br>Assessment Area: San Francisco Bay Metropolitan                                                                                                             |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 91                        | 8.8                   | 72,932                             | 7.1          | 13,583                                             | 18.6         | 240,172                   | 23.5         |
| Moderate                                                                                                                                                                                  | 240                       | 23.1                  | 229,789                            | 22.5         | 17,895                                             | 7.8          | 167,475                   | 16.4         |
| Middle                                                                                                                                                                                    | 330                       | 31.8                  | 344,121                            | 33.7         | 13,218                                             | 3.8          | 191,394                   | 18.7         |
| Upper                                                                                                                                                                                     | 337                       | 32.4                  | 362,427                            | 35.5         | 8,660                                              | 2.4          | 423,164                   | 41.4         |
| Unknown                                                                                                                                                                                   | 41                        | 3.9                   | 12,936                             | 1.3          | 1,582                                              | 12.2         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,039</b>              | <b>100.0</b>          | <b>1,022,205</b>                   | <b>100.0</b> | <b>54,938</b>                                      | <b>5.4</b>   | <b>1,022,205</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by                               | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 132,500                   | 30,475                | 3.5                                | 23.0         | 92,364                                             | 69.7         | 9,661                     | 7.3          |
| Moderate                                                                                                                                                                                  | 380,058                   | 167,123               | 19.2                               | 44.0         | 192,481                                            | 50.6         | 20,454                    | 5.4          |
| Middle                                                                                                                                                                                    | 557,444                   | 306,586               | 35.3                               | 55.0         | 221,156                                            | 39.7         | 29,702                    | 5.3          |
| Upper                                                                                                                                                                                     | 587,052                   | 356,898               | 41.1                               | 60.8         | 192,755                                            | 32.8         | 37,399                    | 6.4          |
| Unknown                                                                                                                                                                                   | 41,149                    | 7,819                 | 0.9                                | 19.0         | 29,308                                             | 71.2         | 4,022                     | 9.8          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,698,203</b>          | <b>868,901</b>        | <b>100.0</b>                       | <b>51.2</b>  | <b>728,064</b>                                     | <b>42.9</b>  | <b>101,238</b>            | <b>6.0</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 14,161                    | 6.2                   | 12,766                             | 6.1          | 1,310                                              | 7.2          | 85                        | 6.6          |
| Moderate                                                                                                                                                                                  | 41,273                    | 18.0                  | 38,171                             | 18.2         | 2,914                                              | 16.0         | 188                       | 14.6         |
| Middle                                                                                                                                                                                    | 68,371                    | 29.8                  | 63,034                             | 30.0         | 4,965                                              | 27.3         | 372                       | 28.9         |
| Upper                                                                                                                                                                                     | 93,111                    | 40.6                  | 85,392                             | 40.7         | 7,170                                              | 39.4         | 549                       | 42.7         |
| Unknown                                                                                                                                                                                   | 12,385                    | 5.4                   | 10,458                             | 5.0          | 1,836                                              | 10.1         | 91                        | 7.1          |
| <b>Total AA</b>                                                                                                                                                                           | <b>229,301</b>            | <b>100.0</b>          | <b>209,821</b>                     | <b>100.0</b> | <b>18,195</b>                                      | <b>100.0</b> | <b>1,285</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>91.5</b>  |                                                    | <b>7.9</b>   |                           | <b>0.6</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 52                        | 4.5                   | 49                                 | 4.4          | 3                                                  | 6.8          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 196                       | 16.8                  | 189                                | 16.9         | 7                                                  | 15.9         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 285                       | 24.5                  | 271                                | 24.2         | 14                                                 | 31.8         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 604                       | 51.8                  | 584                                | 52.2         | 19                                                 | 43.2         | 1                         | 50.0         |
| Unknown                                                                                                                                                                                   | 28                        | 2.4                   | 26                                 | 2.3          | 1                                                  | 2.3          | 1                         | 50.0         |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,165</b>              | <b>100.0</b>          | <b>1,119</b>                       | <b>100.0</b> | <b>44</b>                                          | <b>100.0</b> | <b>2</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>96.1</b>  |                                                    | <b>3.8</b>   |                           | <b>0.2</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D24**

| 2021 Combined Demographics                                     |                           |                                    |                          |                  |                                                    |                      |                           |           |
|----------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Assessment Area: San Francisco Bay Metropolitan                |                           |                                    |                          |                  |                                                    |                      |                           |           |
| Income Categories                                              | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                            | 113                       | 12.2                               | 99,051                   | 10.1             | 24,321                                             | 24.6                 | 240,734                   | 24.5      |
| Moderate                                                       | 198                       | 21.4                               | 201,834                  | 20.5             | 22,893                                             | 11.3                 | 156,646                   | 15.9      |
| Middle                                                         | 276                       | 29.9                               | 317,676                  | 32.3             | 17,358                                             | 5.5                  | 177,159                   | 18.0      |
| Upper                                                          | 322                       | 34.8                               | 361,447                  | 36.8             | 9,081                                              | 2.5                  | 407,773                   | 41.5      |
| Unknown                                                        | 15                        | 1.6                                | 2,304                    | 0.2              | 283                                                | 12.3                 | 0                         | 0.0       |
| Total AA                                                       | 924                       | 100.0                              | 982,312                  | 100.0            | 73,936                                             | 7.5                  | 982,312                   | 100.0     |
|                                                                | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                |                           | #                                  | % by                     | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                            | 191,251                   | 39,757                             | 4.8                      | 20.8             | 135,027                                            | 70.6                 | 16,467                    | 8.6       |
| Moderate                                                       | 346,462                   | 141,407                            | 17.1                     | 40.8             | 184,685                                            | 53.3                 | 20,370                    | 5.9       |
| Middle                                                         | 521,675                   | 276,060                            | 33.4                     | 52.9             | 218,082                                            | 41.8                 | 27,533                    | 5.3       |
| Upper                                                          | 581,474                   | 366,890                            | 44.4                     | 63.1             | 185,326                                            | 31.9                 | 29,258                    | 5.0       |
| Unknown                                                        | 10,511                    | 1,318                              | 0.2                      | 12.5             | 7,999                                              | 76.1                 | 1,194                     | 11.4      |
| Total AA                                                       | 1,651,373                 | 825,432                            | 100.0                    | 50.0             | 731,119                                            | 44.3                 | 94,822                    | 5.7       |
|                                                                | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                            | 26,929                    | 11.8                               | 23,754                   | 11.4             | 3,031                                              | 16.6                 | 144                       | 12.2      |
| Moderate                                                       | 39,481                    | 17.3                               | 36,368                   | 17.4             | 2,930                                              | 16.0                 | 183                       | 15.5      |
| Middle                                                         | 65,298                    | 28.6                               | 60,294                   | 28.9             | 4,693                                              | 25.7                 | 311                       | 26.3      |
| Upper                                                          | 94,659                    | 41.5                               | 86,702                   | 41.5             | 7,434                                              | 40.7                 | 523                       | 44.2      |
| Unknown                                                        | 1,861                     | 0.8                                | 1,649                    | 0.8              | 191                                                | 1.0                  | 21                        | 1.8       |
| Total AA                                                       | 228,228                   | 100.0                              | 208,767                  | 100.0            | 18,279                                             | 100.0                | 1,182                     | 100.0     |
| Percentage of Total Businesses:                                |                           |                                    |                          | 91.5             |                                                    | 8.0                  |                           | 0.5       |
|                                                                | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                            | 84                        | 7.1                                | 79                       | 6.9              | 4                                                  | 9.5                  | 1                         | 25.0      |
| Moderate                                                       | 144                       | 12.1                               | 140                      | 12.2             | 3                                                  | 7.1                  | 1                         | 25.0      |
| Middle                                                         | 375                       | 31.5                               | 354                      | 31.0             | 20                                                 | 47.6                 | 1                         | 25.0      |
| Upper                                                          | 582                       | 48.9                               | 566                      | 49.5             | 15                                                 | 35.7                 | 1                         | 25.0      |
| Unknown                                                        | 4                         | 0.3                                | 4                        | 0.3              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                       | 1,189                     | 100.0                              | 1,143                    | 100.0            | 42                                                 | 100.0                | 4                         | 100.0     |
| Percentage of Total Farms:                                     |                           |                                    |                          | 96.1             |                                                    | 3.5                  |                           | 0.3       |
| Source: 2021 FFIEC Census Data                                 |                           |                                    |                          |                  |                                                    |                      |                           |           |
| 2021 Dun & Bradstreet Data                                     |                           |                                    |                          |                  |                                                    |                      |                           |           |
| 2011-2015 U.S. Census Bureau: American Community Survey        |                           |                                    |                          |                  |                                                    |                      |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |



Table D25

| 2020 Combined Demographics                                     |                           |                                    |                          |                  |                                                    |                      |                           |           |
|----------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Assessment Area: San Francisco Bay Metropolitan                |                           |                                    |                          |                  |                                                    |                      |                           |           |
| Income Categories                                              | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                            | 113                       | 12.2                               | 99,051                   | 10.1             | 24,321                                             | 24.6                 | 240,734                   | 24.5      |
| Moderate                                                       | 198                       | 21.4                               | 201,834                  | 20.5             | 22,893                                             | 11.3                 | 156,646                   | 15.9      |
| Middle                                                         | 276                       | 29.9                               | 317,676                  | 32.3             | 17,358                                             | 5.5                  | 177,159                   | 18.0      |
| Upper                                                          | 322                       | 34.8                               | 361,447                  | 36.8             | 9,081                                              | 2.5                  | 407,773                   | 41.5      |
| Unknown                                                        | 15                        | 1.6                                | 2,304                    | 0.2              | 283                                                | 12.3                 | 0                         | 0.0       |
| Total AA                                                       | 924                       | 100.0                              | 982,312                  | 100.0            | 73,936                                             | 7.5                  | 982,312                   | 100.0     |
|                                                                | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                |                           | #                                  | % by                     | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                            | 191,251                   | 39,757                             | 4.8                      | 20.8             | 135,027                                            | 70.6                 | 16,467                    | 8.6       |
| Moderate                                                       | 346,462                   | 141,407                            | 17.1                     | 40.8             | 184,685                                            | 53.3                 | 20,370                    | 5.9       |
| Middle                                                         | 521,675                   | 276,060                            | 33.4                     | 52.9             | 218,082                                            | 41.8                 | 27,533                    | 5.3       |
| Upper                                                          | 581,474                   | 366,890                            | 44.4                     | 63.1             | 185,326                                            | 31.9                 | 29,258                    | 5.0       |
| Unknown                                                        | 10,511                    | 1,318                              | 0.2                      | 12.5             | 7,999                                              | 76.1                 | 1,194                     | 11.4      |
| Total AA                                                       | 1,651,373                 | 825,432                            | 100.0                    | 50.0             | 731,119                                            | 44.3                 | 94,822                    | 5.7       |
|                                                                | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                            | 27,119                    | 11.8                               | 23,790                   | 11.3             | 3,188                                              | 16.9                 | 141                       | 12.9      |
| Moderate                                                       | 39,804                    | 17.3                               | 36,626                   | 17.4             | 3,015                                              | 16.0                 | 163                       | 14.9      |
| Middle                                                         | 65,942                    | 28.6                               | 60,853                   | 28.9             | 4,807                                              | 25.6                 | 282                       | 25.7      |
| Upper                                                          | 95,469                    | 41.5                               | 87,376                   | 41.5             | 7,603                                              | 40.4                 | 490                       | 44.7      |
| Unknown                                                        | 1,882                     | 0.8                                | 1,662                    | 0.8              | 200                                                | 1.1                  | 20                        | 1.8       |
| Total AA                                                       | 230,216                   | 100.0                              | 210,307                  | 100.0            | 18,813                                             | 100.0                | 1,096                     | 100.0     |
| Percentage of Total Businesses:                                |                           |                                    |                          | 91.4             |                                                    | 8.2                  |                           | 0.5       |
|                                                                | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                            | 82                        | 6.8                                | 75                       | 6.4              | 6                                                  | 13.0                 | 1                         | 25.0      |
| Moderate                                                       | 148                       | 12.2                               | 143                      | 12.3             | 4                                                  | 8.7                  | 1                         | 25.0      |
| Middle                                                         | 376                       | 31.0                               | 356                      | 30.6             | 19                                                 | 41.3                 | 1                         | 25.0      |
| Upper                                                          | 604                       | 49.8                               | 586                      | 50.3             | 17                                                 | 37.0                 | 1                         | 25.0      |
| Unknown                                                        | 4                         | 0.3                                | 4                        | 0.3              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                       | 1,214                     | 100.0                              | 1,164                    | 100.0            | 46                                                 | 100.0                | 4                         | 100.0     |
| Percentage of Total Farms:                                     |                           |                                    |                          | 95.9             |                                                    | 3.8                  |                           | 0.3       |
| Source: 2020 FFIEC Census Data                                 |                           |                                    |                          |                  |                                                    |                      |                           |           |
| 2020 Dun & Bradstreet Data                                     |                           |                                    |                          |                  |                                                    |                      |                           |           |
| 2011-2015 U.S. Census Bureau: American Community Survey        |                           |                                    |                          |                  |                                                    |                      |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |

Table D26A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Francisco Bay Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                       | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                     | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                     | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                     | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 0                                | 0.0   | 5.9   | 0       | 0.0   | 3.8   | 2    | 8.7   | 4.4   | 282     | 3.4   | 2.5   | 3.5                          |
| Moderate                                                                                                                            | 1                                | 6.7   | 18.4  | 1,520   | 20.9  | 13.1  | 5    | 21.7  | 21.2  | 720     | 8.8   | 14.8  | 19.2                         |
| Middle                                                                                                                              | 5                                | 33.3  | 32.6  | 1,602   | 22.1  | 28.4  | 6    | 26.1  | 37.4  | 2,493   | 30.3  | 33.1  | 35.3                         |
| Upper                                                                                                                               | 9                                | 60.0  | 42.5  | 4,138   | 57.0  | 54.3  | 10   | 43.5  | 36.1  | 4,724   | 57.5  | 48.6  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.4   | 0    | 0.0   | 1.0   | 0       | 0.0   | 1.0   | 0.9                          |
| Total                                                                                                                               | 15                               | 100.0 | 100.0 | 7,260   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 8,219   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 2                                | 2.2   | 4.4   | 372     | 0.6   | 3.2   | 2    | 2.1   | 4.1   | 1,190   | 2.7   | 2.5   | 3.5                          |
| Moderate                                                                                                                            | 8                                | 8.8   | 15.9  | 2,619   | 4.5   | 12.1  | 8    | 8.5   | 19.8  | 2,279   | 5.2   | 13.7  | 19.2                         |
| Middle                                                                                                                              | 27                               | 29.7  | 33.2  | 10,084  | 17.4  | 29.1  | 31   | 33.0  | 33.9  | 11,086  | 25.2  | 28.0  | 35.3                         |
| Upper                                                                                                                               | 54                               | 59.3  | 46.3  | 44,867  | 77.4  | 55.5  | 53   | 56.4  | 41.2  | 29,457  | 66.9  | 54.8  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 1.0   | 0       | 0.0   | 1.0   | 0.9                          |
| Total                                                                                                                               | 91                               | 100.0 | 100.0 | 57,942  | 100.0 | 100.0 | 94   | 100.0 | 100.0 | 44,012  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 9                                | 3.0   | 3.0   | 1,515   | 1.9   | 2.4   | 2    | 0.8   | 2.0   | 160     | 0.3   | 1.3   | 3.5                          |
| Moderate                                                                                                                            | 42                               | 13.9  | 11.3  | 8,308   | 10.4  | 9.1   | 40   | 16.4  | 14.2  | 6,011   | 9.7   | 10.3  | 19.2                         |
| Middle                                                                                                                              | 93                               | 30.7  | 32.6  | 21,857  | 27.4  | 28.2  | 97   | 39.8  | 34.6  | 22,048  | 35.5  | 28.5  | 35.3                         |
| Upper                                                                                                                               | 159                              | 52.5  | 53.0  | 48,037  | 60.3  | 60.3  | 105  | 43.0  | 48.6  | 33,889  | 54.6  | 59.2  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 0.9                          |
| Total                                                                                                                               | 303                              | 100.0 | 100.0 | 79,717  | 100.0 | 100.0 | 244  | 100.0 | 100.0 | 62,108  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                 | 0                                | 0.0   | 17.8  | 0       | 0.0   | 13.7  | 0    | 0.0   | 11.4  | 0       | 0.0   | 10.6  | 12.8                         |
| Moderate                                                                                                                            | 1                                | 100.0 | 27.0  | 892     | 100.0 | 30.5  | 1    | 25.0  | 27.5  | 100,000 | 76.6  | 24.1  | 22.9                         |
| Middle                                                                                                                              | 0                                | 0.0   | 28.1  | 0       | 0.0   | 26.1  | 1    | 25.0  | 26.2  | 29,000  | 22.2  | 33.0  | 28.4                         |
| Upper                                                                                                                               | 0                                | 0.0   | 25.9  | 0       | 0.0   | 28.8  | 0    | 0.0   | 30.8  | 0       | 0.0   | 28.6  | 29.9                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 1.2   | 0       | 0.0   | 0.9   | 2    | 50.0  | 4.1   | 1,517   | 1.2   | 3.8   | 6.1                          |
| Total                                                                                                                               | 1                                | 100.0 | 100.0 | 892     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 130,517 | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                 | 14                               | 2.4   | 4.7   | 2,331   | 1.1   | 3.6   | 8    | 1.7   | 4.0   | 1,822   | 0.6   | 2.9   | 3.5                          |
| Moderate                                                                                                                            | 79                               | 13.5  | 16.3  | 20,084  | 9.9   | 12.6  | 70   | 14.7  | 19.5  | 112,346 | 39.6  | 14.5  | 19.2                         |
| Middle                                                                                                                              | 187                              | 31.9  | 32.9  | 50,443  | 24.8  | 28.6  | 178  | 37.3  | 35.4  | 79,138  | 27.9  | 30.6  | 35.3                         |
| Upper                                                                                                                               | 306                              | 52.2  | 45.8  | 130,468 | 64.2  | 54.9  | 219  | 45.9  | 40.2  | 88,660  | 31.3  | 50.7  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 2    | 0.4   | 0.9   | 1,517   | 0.5   | 1.1   | 0.9                          |
| Total                                                                                                                               | 586                              | 100.0 | 100.0 | 203,326 | 100.0 | 100.0 | 477  | 100.0 | 100.0 | 283,483 | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D26B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: San Francisco Bay Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                       | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                     | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                     | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                     | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 3                                | 1.7   | 2.3   | 444     | 0.8   | 1.5   | 2    | 1.8   | 2.0   | 190     | 0.6   | 1.0   | 3.5                          |
| Moderate                                                                                                                            | 27                               | 15.4  | 11.4  | 6,745   | 12.2  | 8.1   | 16   | 14.5  | 13.2  | 3,336   | 10.5  | 8.5   | 19.2                         |
| Middle                                                                                                                              | 62                               | 35.4  | 30.8  | 16,900  | 30.5  | 25.7  | 42   | 38.2  | 34.1  | 10,711  | 33.6  | 26.7  | 35.3                         |
| Upper                                                                                                                               | 83                               | 47.4  | 55.5  | 31,251  | 56.5  | 64.6  | 50   | 45.5  | 50.2  | 17,665  | 55.4  | 63.3  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.5   | 0       | 0.0   | 0.5   | 0.9                          |
| Total                                                                                                                               | 175                              | 100.0 | 100.0 | 55,340  | 100.0 | 100.0 | 110  | 100.0 | 100.0 | 31,902  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 0                                | 0.0   | 4.3   | 0       | 0.0   | 1.7   | 0    | 0.0   | 2.7   | 0       | 0.0   | 0.9   | 3.5                          |
| Moderate                                                                                                                            | 0                                | 0.0   | 13.8  | 0       | 0.0   | 6.4   | 0    | 0.0   | 16.4  | 0       | 0.0   | 5.7   | 19.2                         |
| Middle                                                                                                                              | 0                                | 0.0   | 28.8  | 0       | 0.0   | 16.9  | 1    | 50.0  | 33.0  | 3,800   | 56.5  | 15.8  | 35.3                         |
| Upper                                                                                                                               | 1                                | 100.0 | 52.8  | 2,175   | 100.0 | 74.9  | 1    | 50.0  | 47.4  | 2,925   | 43.5  | 76.5  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.6   | 0       | 0.0   | 1.1   | 0.9                          |
| Total                                                                                                                               | 1                                | 100.0 | 100.0 | 2,175   | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 6,725   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 0                                | 0.0   | 8.4   | 0       | 0.0   | 6.4   | 0    | 0.0   | 5.0   | 0       | 0.0   | 3.2   | 3.5                          |
| Moderate                                                                                                                            | 0                                | 0.0   | 22.2  | 0       | 0.0   | 18.6  | 0    | 0.0   | 25.4  | 0       | 0.0   | 15.9  | 19.2                         |
| Middle                                                                                                                              | 0                                | 0.0   | 37.8  | 0       | 0.0   | 34.7  | 0    | 0.0   | 40.9  | 0       | 0.0   | 40.7  | 35.3                         |
| Upper                                                                                                                               | 0                                | 0.0   | 31.6  | 0       | 0.0   | 40.3  | 0    | 0.0   | 27.1  | 0       | 0.0   | 39.6  | 41.1                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.6   | 0.9                          |
| Total                                                                                                                               | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D27A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Francisco Bay Metropolitan                         |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 14.3  | 5.8   | 95      | 4.4   | 3.8   | 4.8                          |
| Moderate                                                                | 0                        | 0.0   | 17.9  | 0       | 0.0   | 12.7  | 17.1                         |
| Middle                                                                  | 1                        | 14.3  | 32.6  | 273     | 12.7  | 28.6  | 33.4                         |
| Upper                                                                   | 5                        | 71.4  | 43.2  | 1,790   | 82.9  | 54.6  | 44.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 0.2                          |
| Total                                                                   | 7                        | 100.0 | 100.0 | 2,158   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 6                        | 5.1   | 3.7   | 2,042   | 3.0   | 2.8   | 4.8                          |
| Moderate                                                                | 11                       | 9.4   | 15.3  | 5,588   | 8.3   | 12.2  | 17.1                         |
| Middle                                                                  | 22                       | 18.8  | 34.9  | 10,103  | 15.1  | 31.5  | 33.4                         |
| Upper                                                                   | 78                       | 66.7  | 45.9  | 49,356  | 73.6  | 53.3  | 44.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.2                          |
| Total                                                                   | 117                      | 100.0 | 100.0 | 67,089  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 14                       | 7.8   | 3.1   | 2,459   | 5.3   | 2.6   | 4.8                          |
| Moderate                                                                | 12                       | 6.7   | 13.3  | 2,357   | 5.1   | 11.2  | 17.1                         |
| Middle                                                                  | 55                       | 30.6  | 31.8  | 11,209  | 24.3  | 28.3  | 33.4                         |
| Upper                                                                   | 98                       | 54.4  | 51.7  | 30,007  | 65.0  | 57.6  | 44.4                         |
| Unknown                                                                 | 1                        | 0.6   | 0.1   | 105     | 0.2   | 0.2   | 0.2                          |
| Total                                                                   | 180                      | 100.0 | 100.0 | 46,137  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-<br>family<br>Units %  |
| Low                                                                     | 0                        | 0.0   | 18.0  | 0       | 0.0   | 15.7  |                              |
| Moderate                                                                | 0                        | 0.0   | 27.2  | 0       | 0.0   | 21.6  | 24.1                         |
| Middle                                                                  | 2                        | 100.0 | 28.7  | 1,485   | 100.0 | 27.1  | 26.8                         |
| Upper                                                                   | 0                        | 0.0   | 25.0  | 0       | 0.0   | 34.6  | 27.5                         |
| Unknown                                                                 | 0                        | 0.0   | 1.1   | 0       | 0.0   | 1.0   | 1.8                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 1,485   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 29                       | 7.7   | 4.1   | 5,510   | 3.8   | 3.5   |                              |
| Moderate                                                                | 30                       | 7.9   | 15.7  | 9,298   | 6.3   | 12.5  | 17.1                         |
| Middle                                                                  | 102                      | 27.0  | 34.3  | 28,037  | 19.1  | 30.5  | 33.4                         |
| Upper                                                                   | 216                      | 57.1  | 45.7  | 103,876 | 70.7  | 53.3  | 44.4                         |
| Unknown                                                                 | 1                        | 0.3   | 0.2   | 105     | 0.1   | 0.2   | 0.2                          |
| Total                                                                   | 378                      | 100.0 | 100.0 | 146,826 | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D27B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: San Francisco Bay Metropolitan                         |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 8                        | 11.4  | 2.8   | 914     | 3.8   | 1.9   | 4.8                          |
| Moderate                                                                | 7                        | 10.0  | 11.8  | 1,353   | 5.7   | 8.5   | 17.1                         |
| Middle                                                                  | 21                       | 30.0  | 29.2  | 4,817   | 20.3  | 22.8  | 33.4                         |
| Upper                                                                   | 34                       | 48.6  | 56.0  | 16,673  | 70.2  | 66.7  | 44.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.2                          |
| Total                                                                   | 70                       | 100.0 | 100.0 | 23,757  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.9   | 0       | 0.0   | 2.1   | 4.8                          |
| Moderate                                                                | 0                        | 0.0   | 14.5  | 0       | 0.0   | 6.9   | 17.1                         |
| Middle                                                                  | 1                        | 50.0  | 30.6  | 150     | 2.4   | 19.9  | 33.4                         |
| Upper                                                                   | 1                        | 50.0  | 49.8  | 6,050   | 97.6  | 70.9  | 44.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.2                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 6,200   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 8.2   | 0       | 0.0   | 5.3   | 4.8                          |
| Moderate                                                                | 0                        | 0.0   | 20.2  | 0       | 0.0   | 12.7  | 17.1                         |
| Middle                                                                  | 0                        | 0.0   | 30.7  | 0       | 0.0   | 26.6  | 33.4                         |
| Upper                                                                   | 0                        | 0.0   | 40.4  | 0       | 0.0   | 54.9  | 44.4                         |
| Unknown                                                                 | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D28

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: San Francisco Bay Metropolitan                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 54                               | 14.2  | 10.8  | 12,196  | 14.6  | 12.6  | 16   | 6.1   | 5.9   | 4,179   | 6.3   | 5.9   | 6.2                      |
| Moderate                                                                                                                                                                                  | 63                               | 16.6  | 18.0  | 14,120  | 16.9  | 16.7  | 59   | 22.5  | 19.1  | 12,103  | 18.2  | 16.8  | 18.0                     |
| Middle                                                                                                                                                                                    | 97                               | 25.5  | 29.9  | 18,414  | 22.0  | 27.6  | 86   | 32.8  | 31.5  | 21,451  | 32.3  | 29.8  | 29.8                     |
| Upper                                                                                                                                                                                     | 166                              | 43.7  | 40.1  | 38,860  | 46.5  | 42.2  | 78   | 29.8  | 39.1  | 21,524  | 32.4  | 41.2  | 40.6                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.8   | 23   | 8.8   | 3.9   | 7,225   | 10.9  | 6.1   | 5.4                      |
| Total                                                                                                                                                                                     | 380                              | 100.0 | 100.0 | 83,590  | 100.0 | 100.0 | 262  | 100.0 | 100.0 | 66,482  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D29A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Francisco Bay Metropolitan                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                                                                                              | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                                                                                                          | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 1                                | 6.7   | 1.8   | 132     | 1.8   | 0.8   | 0    | 0.0   | 2.1   | 0       | 0.0   | 0.9   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 1                                | 6.7   | 9.2   | 264     | 3.6   | 4.5   | 2    | 8.7   | 9.4   | 891     | 10.8  | 4.3   | 16.4                              |
| Middle                                                                                                                                                                                                                                   | 4                                | 26.7  | 17.8  | 1,402   | 19.3  | 12.2  | 9    | 39.1  | 17.5  | 1,827   | 22.2  | 11.8  | 18.7                              |
| Upper                                                                                                                                                                                                                                    | 9                                | 60.0  | 60.4  | 5,462   | 75.2  | 72.3  | 11   | 47.8  | 58.3  | 4,626   | 56.3  | 71.3  | 41.4                              |
| Unknown                                                                                                                                                                                                                                  | 0                                | 0.0   | 10.8  | 0       | 0.0   | 10.3  | 1    | 4.3   | 12.7  | 875     | 10.6  | 11.8  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 15                               | 100.0 | 100.0 | 7,260   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 8,219   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 6                                | 6.6   | 6.0   | 1,252   | 2.2   | 3.3   | 1    | 1.1   | 11.5  | 120     | 0.3   | 6.8   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 9                                | 9.9   | 14.4  | 2,963   | 5.1   | 9.1   | 14   | 14.9  | 16.0  | 3,497   | 7.9   | 9.6   | 16.4                              |
| Middle                                                                                                                                                                                                                                   | 14                               | 15.4  | 20.1  | 4,808   | 8.3   | 16.1  | 14   | 14.9  | 17.9  | 4,714   | 10.7  | 13.9  | 18.7                              |
| Upper                                                                                                                                                                                                                                    | 58                               | 63.7  | 48.3  | 43,251  | 74.6  | 59.9  | 61   | 64.9  | 40.7  | 29,376  | 66.7  | 54.6  | 41.4                              |
| Unknown                                                                                                                                                                                                                                  | 4                                | 4.4   | 11.2  | 5,668   | 9.8   | 11.5  | 4    | 4.3   | 13.9  | 6,305   | 14.3  | 15.2  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 91                               | 100.0 | 100.0 | 57,942  | 100.0 | 100.0 | 94   | 100.0 | 100.0 | 44,012  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 5                                | 1.7   | 4.2   | 617     | 0.8   | 3.3   | 6    | 2.5   | 4.2   | 721     | 1.2   | 2.7   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 19                               | 6.3   | 9.9   | 2,187   | 2.7   | 7.0   | 17   | 7.0   | 11.6  | 2,746   | 4.4   | 6.9   | 16.4                              |
| Middle                                                                                                                                                                                                                                   | 59                               | 19.5  | 19.5  | 10,729  | 13.5  | 15.3  | 56   | 23.0  | 20.8  | 9,383   | 15.1  | 14.7  | 18.7                              |
| Upper                                                                                                                                                                                                                                    | 215                              | 71.0  | 62.5  | 64,834  | 81.3  | 67.8  | 160  | 65.6  | 58.9  | 47,857  | 77.1  | 69.9  | 41.4                              |
| Unknown                                                                                                                                                                                                                                  | 5                                | 1.7   | 3.9   | 1,350   | 1.7   | 6.6   | 5    | 2.0   | 4.4   | 1,401   | 2.3   | 5.8   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 303                              | 100.0 | 100.0 | 79,717  | 100.0 | 100.0 | 244  | 100.0 | 100.0 | 62,108  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 15                               | 2.6   | 5.1   | 2,471   | 1.2   | 2.6   | 11   | 2.3   | 6.1   | 1,330   | 0.9   | 3.2   | 23.5                              |
| Moderate                                                                                                                                                                                                                                 | 41                               | 7.0   | 13.0  | 7,273   | 3.6   | 7.6   | 50   | 10.6  | 12.1  | 10,418  | 6.8   | 6.2   | 16.4                              |
| Middle                                                                                                                                                                                                                                   | 109                              | 18.6  | 19.5  | 24,025  | 11.9  | 14.8  | 97   | 20.5  | 18.1  | 19,517  | 12.8  | 12.4  | 18.7                              |
| Upper                                                                                                                                                                                                                                    | 404                              | 69.1  | 51.6  | 157,747 | 77.9  | 63.9  | 304  | 64.3  | 51.6  | 112,620 | 73.6  | 65.2  | 41.4                              |
| Unknown                                                                                                                                                                                                                                  | 16                               | 2.7   | 10.9  | 10,918  | 5.4   | 11.2  | 11   | 2.3   | 12.1  | 9,081   | 5.9   | 13.0  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 585                              | 100.0 | 100.0 | 202,434 | 100.0 | 100.0 | 473  | 100.0 | 100.0 | 152,966 | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D29B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Francisco Bay Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                 | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 3                                | 1.7   | 4.3   | 470     | 0.8   | 4.8   | 4    | 3.6   | 3.8   | 489     | 1.5   | 3.4   | 23.5                              |
| Moderate                                                                                                                        | 12                               | 6.9   | 8.3   | 1,859   | 3.4   | 4.4   | 17   | 15.5  | 9.3   | 3,284   | 10.3  | 4.6   | 16.4                              |
| Middle                                                                                                                          | 32                               | 18.3  | 17.9  | 7,086   | 12.8  | 11.1  | 18   | 16.4  | 20.2  | 3,593   | 11.3  | 12.5  | 18.7                              |
| Upper                                                                                                                           | 121                              | 69.1  | 63.6  | 42,025  | 75.9  | 70.7  | 70   | 63.6  | 58.4  | 24,036  | 75.3  | 68.8  | 41.4                              |
| Unknown                                                                                                                         | 7                                | 4.0   | 6.0   | 3,900   | 7.0   | 9.0   | 1    | 0.9   | 8.2   | 500     | 1.6   | 10.6  | 0.0                               |
| Total                                                                                                                           | 175                              | 100.0 | 100.0 | 55,340  | 100.0 | 100.0 | 110  | 100.0 | 100.0 | 31,902  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 0                                | 0.0   | 6.6   | 0       | 0.0   | 2.8   | 0    | 0.0   | 8.1   | 0       | 0.0   | 4.4   | 23.5                              |
| Moderate                                                                                                                        | 0                                | 0.0   | 11.4  | 0       | 0.0   | 4.2   | 0    | 0.0   | 12.3  | 0       | 0.0   | 3.7   | 16.4                              |
| Middle                                                                                                                          | 0                                | 0.0   | 16.9  | 0       | 0.0   | 7.2   | 0    | 0.0   | 17.6  | 0       | 0.0   | 5.7   | 18.7                              |
| Upper                                                                                                                           | 1                                | 100.0 | 58.8  | 2,175   | 100.0 | 71.5  | 2    | 100.0 | 52.0  | 6,725   | 100.0 | 68.5  | 41.4                              |
| Unknown                                                                                                                         | 0                                | 0.0   | 6.2   | 0       | 0.0   | 14.2  | 0    | 0.0   | 10.0  | 0       | 0.0   | 17.7  | 0.0                               |
| Total                                                                                                                           | 1                                | 100.0 | 100.0 | 2,175   | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 6,725   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 0                                | 0.0   | 1.5   | 0       | 0.0   | 0.2   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.4   | 23.5                              |
| Moderate                                                                                                                        | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.6   | 16.4                              |
| Middle                                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.7                              |
| Upper                                                                                                                           | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.1   | 41.4                              |
| Unknown                                                                                                                         | 0                                | 0.0   | 97.8  | 0       | 0.0   | 99.3  | 0    | 0.0   | 97.2  | 0       | 0.0   | 98.9  | 0.0                               |
| Total                                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D30A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Francisco Bay Metropolitan                                                                                                                   |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 2.0   | 0       | 0.0   | 0.9   | 24.5                              |
| Moderate                                                                                                                                                                                                                                 | 0                        | 0.0   | 9.7   | 0       | 0.0   | 4.9   | 15.9                              |
| Middle                                                                                                                                                                                                                                   | 3                        | 42.9  | 18.8  | 485     | 22.5  | 13.1  | 18.0                              |
| Upper                                                                                                                                                                                                                                    | 4                        | 57.1  | 61.7  | 1,673   | 77.5  | 73.6  | 41.5                              |
| Unknown                                                                                                                                                                                                                                  | 0                        | 0.0   | 7.7   | 0       | 0.0   | 7.5   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 7                        | 100.0 | 100.0 | 2,158   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 1                        | 0.9   | 4.3   | 264     | 0.4   | 2.4   | 24.5                              |
| Moderate                                                                                                                                                                                                                                 | 13                       | 11.1  | 13.2  | 3,352   | 5.0   | 8.8   | 15.9                              |
| Middle                                                                                                                                                                                                                                   | 17                       | 14.5  | 22.0  | 4,878   | 7.3   | 18.3  | 18.0                              |
| Upper                                                                                                                                                                                                                                    | 75                       | 64.1  | 51.0  | 48,172  | 71.8  | 60.7  | 41.5                              |
| Unknown                                                                                                                                                                                                                                  | 11                       | 9.4   | 9.5   | 10,423  | 15.5  | 9.7   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 117                      | 100.0 | 100.0 | 67,089  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 3                        | 1.7   | 4.1   | 295     | 0.6   | 2.7   | 24.5                              |
| Moderate                                                                                                                                                                                                                                 | 17                       | 9.4   | 11.2  | 2,537   | 5.5   | 9.4   | 15.9                              |
| Middle                                                                                                                                                                                                                                   | 36                       | 20.0  | 19.5  | 6,912   | 15.0  | 16.6  | 18.0                              |
| Upper                                                                                                                                                                                                                                    | 122                      | 67.8  | 60.8  | 36,193  | 78.4  | 65.5  | 41.5                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 1.1   | 4.4   | 200     | 0.4   | 5.8   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 180                      | 100.0 | 100.0 | 46,137  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 7                        | 1.9   | 3.9   | 797     | 0.5   | 2.1   | 24.5                              |
| Moderate                                                                                                                                                                                                                                 | 35                       | 9.3   | 12.5  | 6,421   | 4.4   | 7.8   | 15.9                              |
| Middle                                                                                                                                                                                                                                   | 64                       | 17.0  | 21.2  | 13,984  | 9.6   | 16.8  | 18.0                              |
| Upper                                                                                                                                                                                                                                    | 254                      | 67.6  | 53.0  | 107,416 | 73.9  | 63.6  | 41.5                              |
| Unknown                                                                                                                                                                                                                                  | 16                       | 4.3   | 9.5   | 16,723  | 11.5  | 9.7   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 376                      | 100.0 | 100.0 | 145,341 | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |



Table D30B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: San Francisco Bay Metropolitan                                      |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                        | 2.9   | 4.5   | 88      | 0.4   | 3.9   | 24.5                              |
| Moderate                                                                                                                                                    | 5                        | 7.1   | 8.7   | 532     | 2.2   | 5.0   | 15.9                              |
| Middle                                                                                                                                                      | 8                        | 11.4  | 17.9  | 1,709   | 7.2   | 12.1  | 18.0                              |
| Upper                                                                                                                                                       | 52                       | 74.3  | 64.1  | 15,328  | 64.5  | 71.8  | 41.5                              |
| Unknown                                                                                                                                                     | 3                        | 4.3   | 4.7   | 6,100   | 25.7  | 7.2   | 0.0                               |
| Total                                                                                                                                                       | 70                       | 100.0 | 100.0 | 23,757  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 1                        | 50.0  | 6.0   | 150     | 2.4   | 2.2   | 24.5                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 11.2  | 0       | 0.0   | 4.1   | 15.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 17.9  | 0       | 0.0   | 8.6   | 18.0                              |
| Upper                                                                                                                                                       | 1                        | 50.0  | 58.6  | 6,050   | 97.6  | 70.2  | 41.5                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 6.3   | 0       | 0.0   | 14.9  | 0.0                               |
| Total                                                                                                                                                       | 2                        | 100.0 | 100.0 | 6,200   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 24.5                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 1.2   | 0       | 0.0   | 0.6   | 15.9                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 1.7   | 0       | 0.0   | 1.1   | 18.0                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 1.8   | 0       | 0.0   | 2.5   | 41.5                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 95.1  | 0       | 0.0   | 95.7  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table D31**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Francisco Bay Metropolitan                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 128                              | 33.7  | 47.8  | 20,548  | 24.6  | 23.4  | 87   | 33.2  | 55.2  | 10,306  | 15.5  | 31.9  | 91.5                     |
| Over \$1 Million                                                                   | 154                              | 40.5  |       | 51,572  | 61.7  |       | 148  | 56.5  |       | 49,050  | 73.8  |       | 7.9                      |
| Revenue Unknown                                                                    | 98                               | 25.8  |       | 11,470  | 13.7  |       | 27   | 10.3  |       | 7,126   | 10.7  |       | 0.6                      |
| Total                                                                              | 380                              | 100.0 |       | 83,590  | 100.0 |       | 262  | 100.0 |       | 66,482  | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 185                              | 48.7  | 92.7  | 8,721   | 10.4  | 37.8  | 127  | 48.5  | 96.0  | 7,233   | 10.9  | 48.0  |                          |
| \$100,001 - \$250,000                                                              | 80                               | 21.1  | 4.1   | 14,560  | 17.4  | 17.9  | 52   | 19.8  | 2.1   | 9,678   | 14.6  | 13.0  |                          |
| \$250,001 - \$1 Million                                                            | 115                              | 30.3  | 3.1   | 60,309  | 72.1  | 44.3  | 83   | 31.7  | 1.9   | 49,571  | 74.6  | 38.9  |                          |
| Total                                                                              | 380                              | 100.0 | 100.0 | 83,590  | 100.0 | 100.0 | 262  | 100.0 | 100.0 | 66,482  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 76                               | 59.4  |       | 3,273   | 15.9  |       | 67   | 77.0  |       | 3,351   | 32.5  |       |                          |
| \$100,001 - \$250,000                                                              | 28                               | 21.9  |       | 4,923   | 24.0  |       | 12   | 13.8  |       | 2,200   | 21.3  |       |                          |
| \$250,001 - \$1 Million                                                            | 24                               | 18.8  |       | 12,352  | 60.1  |       | 8    | 9.2   |       | 4,755   | 46.1  |       |                          |
| Total                                                                              | 128                              | 100.0 |       | 20,548  | 100.0 |       | 87   | 100.0 |       | 10,306  | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D32

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: San Francisco Bay Metropolitan                                                                         |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 239                      | 42.9  | 43.0  | 27,302  | 24.5  | 24.6  | 91.4                     |
| Over \$1 Million                                                                                                        | 230                      | 41.3  |       | 73,366  | 65.8  |       | 8.2                      |
| Revenue Unknown                                                                                                         | 88                       | 15.8  |       | 10,911  | 9.8   |       | 0.5                      |
| Total                                                                                                                   | 557                      | 100.0 |       | 111,579 | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 303                      | 54.4  | 88.5  | 13,059  | 11.7  | 35.2  |                          |
| \$100,001 - \$250,000                                                                                                   | 108                      | 19.4  | 6.7   | 19,274  | 17.3  | 19.8  |                          |
| \$250,001 - \$1 Million                                                                                                 | 146                      | 26.2  | 4.8   | 79,246  | 71.0  | 45.0  |                          |
| Total                                                                                                                   | 557                      | 100.0 | 100.0 | 111,579 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 168                      | 70.3  |       | 6,746   | 24.7  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 43                       | 18.0  |       | 7,437   | 27.2  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 28                       | 11.7  |       | 13,119  | 48.1  |       |                          |
| Total                                                                                                                   | 239                      | 100.0 |       | 27,302  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

**Table D33**

| 2022 Combined Demographics<br>Assessment Area: Santa Cruz MSA                                                                                                                             |                           |                                    |                          |                  |                                                    |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 5                         | 7.1                                | 3,139                    | 5.2              | 850                                                | 27.1                 | 13,427                    | 22.1      |
| Moderate                                                                                                                                                                                  | 12                        | 17.1                               | 8,937                    | 14.7             | 1,070                                              | 12.0                 | 10,155                    | 16.7      |
| Middle                                                                                                                                                                                    | 29                        | 41.4                               | 24,718                   | 40.6             | 1,446                                              | 5.8                  | 11,749                    | 19.3      |
| Upper                                                                                                                                                                                     | 23                        | 32.9                               | 24,076                   | 39.6             | 640                                                | 2.7                  | 25,539                    | 42.0      |
| Unknown                                                                                                                                                                                   | 1                         | 1.4                                | 0                        | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 70                        | 100.0                              | 60,870                   | 100.0            | 4,006                                              | 6.6                  | 60,870                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 6,049                     | 1,326                              | 2.3                      | 21.9             | 4,325                                              | 71.5                 | 398                       | 6.6       |
| Moderate                                                                                                                                                                                  | 14,524                    | 5,641                              | 9.7                      | 38.8             | 8,021                                              | 55.2                 | 862                       | 5.9       |
| Middle                                                                                                                                                                                    | 43,612                    | 24,362                             | 41.9                     | 55.9             | 15,197                                             | 34.8                 | 4,053                     | 9.3       |
| Upper                                                                                                                                                                                     | 41,634                    | 26,765                             | 46.1                     | 64.3             | 10,638                                             | 25.6                 | 4,231                     | 10.2      |
| Unknown                                                                                                                                                                                   | 0                         | 0                                  | 0.0                      | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 105,819                   | 58,094                             | 100.0                    | 54.9             | 38,181                                             | 36.1                 | 9,544                     | 9.0       |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 785                       | 5.5                                | 673                      | 5.0              | 107                                                | 12.4                 | 5                         | 7.4       |
| Moderate                                                                                                                                                                                  | 1,633                     | 11.4                               | 1,530                    | 11.4             | 94                                                 | 10.9                 | 9                         | 13.2      |
| Middle                                                                                                                                                                                    | 6,627                     | 46.2                               | 6,189                    | 46.1             | 403                                                | 46.8                 | 35                        | 51.5      |
| Upper                                                                                                                                                                                     | 5,301                     | 37.0                               | 5,025                    | 37.5             | 257                                                | 29.8                 | 19                        | 27.9      |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                                | 0                        | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 14,346                    | 100.0                              | 13,417                   | 100.0            | 861                                                | 100.0                | 68                        | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    |                          | 93.5             |                                                    | 6.0                  |                           | 0.5       |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 30                        | 8.3                                | 23                       | 6.9              | 7                                                  | 22.6                 | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 37                        | 10.2                               | 33                       | 9.9              | 4                                                  | 12.9                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 134                       | 36.9                               | 122                      | 36.7             | 12                                                 | 38.7                 | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 162                       | 44.6                               | 154                      | 46.4             | 8                                                  | 25.8                 | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                                | 0                        | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 363                       | 100.0                              | 332                      | 100.0            | 31                                                 | 100.0                | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    |                          | 91.5             |                                                    | 8.5                  |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |

**Table D34**

| 2021 Combined Demographics<br>Assessment Area: Santa Cruz MSA                                                           |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 2                         | 3.8                   | 2,495                              | 4.2          | 640                                                | 25.7         | 13,798                    | 23.1         |
| Moderate                                                                                                                | 11                        | 20.8                  | 14,713                             | 24.7         | 2,199                                              | 14.9         | 10,138                    | 17.0         |
| Middle                                                                                                                  | 22                        | 41.5                  | 23,214                             | 38.9         | 1,700                                              | 7.3          | 10,715                    | 18.0         |
| Upper                                                                                                                   | 17                        | 32.1                  | 19,253                             | 32.3         | 610                                                | 3.2          | 25,024                    | 41.9         |
| Unknown                                                                                                                 | 1                         | 1.9                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>53</b>                 | <b>100.0</b>          | <b>59,675</b>                      | <b>100.0</b> | <b>5,149</b>                                       | <b>8.6</b>   | <b>59,675</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 6,113                     | 1,393                 | 2.5                                | 22.8         | 4,288                                              | 70.1         | 432                       | 7.1          |
| Moderate                                                                                                                | 21,021                    | 9,412                 | 17.2                               | 44.8         | 10,467                                             | 49.8         | 1,142                     | 5.4          |
| Middle                                                                                                                  | 45,656                    | 22,479                | 41.1                               | 49.2         | 17,275                                             | 37.8         | 5,902                     | 12.9         |
| Upper                                                                                                                   | 32,244                    | 21,344                | 39.1                               | 66.2         | 8,144                                              | 25.3         | 2,756                     | 8.5          |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>105,034</b>            | <b>54,628</b>         | <b>100.0</b>                       | <b>52.0</b>  | <b>40,174</b>                                      | <b>38.2</b>  | <b>10,232</b>             | <b>9.7</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 580                       | 4.1                   | 527                                | 4.0          | 51                                                 | 5.9          | 2                         | 3.0          |
| Moderate                                                                                                                | 2,224                     | 15.6                  | 2,032                              | 15.2         | 184                                                | 21.2         | 8                         | 12.1         |
| Middle                                                                                                                  | 6,857                     | 48.1                  | 6,438                              | 48.3         | 390                                                | 44.9         | 29                        | 43.9         |
| Upper                                                                                                                   | 4,604                     | 32.3                  | 4,333                              | 32.5         | 244                                                | 28.1         | 27                        | 40.9         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>14,265</b>             | <b>100.0</b>          | <b>13,330</b>                      | <b>100.0</b> | <b>869</b>                                         | <b>100.0</b> | <b>66</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>93.4</b>  |                                                    | <b>6.1</b>   |                           | <b>0.5</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 11                        | 3.0                   | 9                                  | 2.7          | 2                                                  | 5.9          | 0                         | 0.0          |
| Moderate                                                                                                                | 83                        | 22.8                  | 69                                 | 20.9         | 14                                                 | 41.2         | 0                         | 0.0          |
| Middle                                                                                                                  | 177                       | 48.6                  | 163                                | 49.4         | 14                                                 | 41.2         | 0                         | 0.0          |
| Upper                                                                                                                   | 93                        | 25.5                  | 89                                 | 27.0         | 4                                                  | 11.8         | 0                         | 0.0          |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>364</b>                | <b>100.0</b>          | <b>330</b>                         | <b>100.0</b> | <b>34</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>90.7</b>  |                                                    | <b>9.3</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D35**

| 2020 Combined Demographics<br>Assessment Area: Santa Cruz MSA                                                           |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 2                         | 3.8                   | 2,495                              | 4.2          | 640                                                | 25.7         | 13,798                    | 23.1         |
| Moderate                                                                                                                | 11                        | 20.8                  | 14,713                             | 24.7         | 2,199                                              | 14.9         | 10,138                    | 17.0         |
| Middle                                                                                                                  | 22                        | 41.5                  | 23,214                             | 38.9         | 1,700                                              | 7.3          | 10,715                    | 18.0         |
| Upper                                                                                                                   | 17                        | 32.1                  | 19,253                             | 32.3         | 610                                                | 3.2          | 25,024                    | 41.9         |
| Unknown                                                                                                                 | 1                         | 1.9                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>53</b>                 | <b>100.0</b>          | <b>59,675</b>                      | <b>100.0</b> | <b>5,149</b>                                       | <b>8.6</b>   | <b>59,675</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 6,113                     | 1,393                 | 2.5                                | 22.8         | 4,288                                              | 70.1         | 432                       | 7.1          |
| Moderate                                                                                                                | 21,021                    | 9,412                 | 17.2                               | 44.8         | 10,467                                             | 49.8         | 1,142                     | 5.4          |
| Middle                                                                                                                  | 45,656                    | 22,479                | 41.1                               | 49.2         | 17,275                                             | 37.8         | 5,902                     | 12.9         |
| Upper                                                                                                                   | 32,244                    | 21,344                | 39.1                               | 66.2         | 8,144                                              | 25.3         | 2,756                     | 8.5          |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>105,034</b>            | <b>54,628</b>         | <b>100.0</b>                       | <b>52.0</b>  | <b>40,174</b>                                      | <b>38.2</b>  | <b>10,232</b>             | <b>9.7</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 592                       | 4.0                   | 531                                | 3.9          | 59                                                 | 6.4          | 2                         | 3.3          |
| Moderate                                                                                                                | 2,263                     | 15.5                  | 2,067                              | 15.1         | 190                                                | 20.7         | 6                         | 9.8          |
| Middle                                                                                                                  | 7,079                     | 48.4                  | 6,638                              | 48.6         | 412                                                | 45.0         | 29                        | 47.5         |
| Upper                                                                                                                   | 4,694                     | 32.1                  | 4,415                              | 32.3         | 255                                                | 27.8         | 24                        | 39.3         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>14,628</b>             | <b>100.0</b>          | <b>13,651</b>                      | <b>100.0</b> | <b>916</b>                                         | <b>100.0</b> | <b>61</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>93.3</b>  |                                                    | <b>6.3</b>   |                           | <b>0.4</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 11                        | 2.9                   | 9                                  | 2.7          | 2                                                  | 5.1          | 0                         | 0.0          |
| Moderate                                                                                                                | 82                        | 21.8                  | 68                                 | 20.1         | 14                                                 | 35.9         | 0                         | 0.0          |
| Middle                                                                                                                  | 182                       | 48.3                  | 164                                | 48.5         | 18                                                 | 46.2         | 0                         | 0.0          |
| Upper                                                                                                                   | 102                       | 27.1                  | 97                                 | 28.7         | 5                                                  | 12.8         | 0                         | 0.0          |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>377</b>                | <b>100.0</b>          | <b>338</b>                         | <b>100.0</b> | <b>39</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>89.7</b>  |                                                    | <b>10.3</b>  |                           | <b>0.0</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

Table D36A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Santa Cruz MSA                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.9   | 0       | 0.0   | 2.2   | 0    | 0.0   | 2.5   | 0       | 0.0   | 2.0   | 2.3                          |
| Moderate                                                                         | 0                                | 0.0   | 12.4  | 0       | 0.0   | 9.6   | 1    | 33.3  | 9.5   | 128     | 15.8  | 7.0   | 9.7                          |
| Middle                                                                           | 0                                | 0.0   | 41.4  | 0       | 0.0   | 41.0  | 0    | 0.0   | 41.5  | 0       | 0.0   | 37.2  | 41.9                         |
| Upper                                                                            | 0                                | 0.0   | 43.3  | 0       | 0.0   | 47.2  | 2    | 66.7  | 46.5  | 680     | 84.2  | 53.7  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 3    | 100.0 | 100.0 | 808     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 1                                | 4.5   | 2.6   | 162     | 2.6   | 2.1   | 2    | 10.5  | 2.0   | 416     | 6.8   | 1.6   | 2.3                          |
| Moderate                                                                         | 8                                | 36.4  | 15.9  | 2,055   | 33.6  | 12.9  | 2    | 10.5  | 8.9   | 278     | 4.5   | 7.0   | 9.7                          |
| Middle                                                                           | 6                                | 27.3  | 41.8  | 1,758   | 28.7  | 41.5  | 8    | 42.1  | 44.6  | 2,196   | 35.7  | 40.4  | 41.9                         |
| Upper                                                                            | 7                                | 31.8  | 39.8  | 2,149   | 35.1  | 43.6  | 7    | 36.8  | 44.6  | 3,253   | 53.0  | 50.9  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 22                               | 100.0 | 100.0 | 6,124   | 100.0 | 100.0 | 19   | 100.0 | 100.0 | 6,143   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.1   | 0       | 0.0   | 1.1   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.6   | 2.3                          |
| Moderate                                                                         | 3                                | 6.1   | 9.7   | 372     | 3.8   | 9.4   | 7    | 10.0  | 5.2   | 1,198   | 9.2   | 5.0   | 9.7                          |
| Middle                                                                           | 25                               | 51.0  | 43.2  | 4,415   | 44.8  | 46.3  | 30   | 42.9  | 39.7  | 5,670   | 43.4  | 38.3  | 41.9                         |
| Upper                                                                            | 21                               | 42.9  | 45.0  | 5,062   | 51.4  | 43.1  | 33   | 47.1  | 53.9  | 6,185   | 47.4  | 56.1  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 49                               | 100.0 | 100.0 | 9,849   | 100.0 | 100.0 | 70   | 100.0 | 100.0 | 13,053  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 24.3  | 0       | 0.0   | 8.1   | 0    | 0.0   | 11.1  | 0       | 0.0   | 5.4   |                              |
| Moderate                                                                         | 0                                | 0.0   | 8.1   | 0       | 0.0   | 5.0   | 0    | 0.0   | 29.6  | 0       | 0.0   | 17.9  | 24.4                         |
| Middle                                                                           | 0                                | 0.0   | 62.2  | 0       | 0.0   | 83.4  | 0    | 0.0   | 37.0  | 0       | 0.0   | 10.9  | 36.5                         |
| Upper                                                                            | 0                                | 0.0   | 5.4   | 0       | 0.0   | 3.5   | 0    | 0.0   | 22.2  | 0       | 0.0   | 65.8  | 22.7                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 1                                | 1.0   | 2.7   | 162     | 0.7   | 2.2   | 2    | 1.6   | 2.1   | 416     | 1.5   | 1.9   |                              |
| Moderate                                                                         | 14                               | 13.3  | 14.9  | 2,919   | 12.2  | 11.8  | 13   | 10.4  | 8.6   | 2,223   | 7.8   | 7.3   | 9.7                          |
| Middle                                                                           | 50                               | 47.6  | 41.8  | 11,460  | 47.8  | 42.3  | 54   | 43.2  | 42.3  | 12,110  | 42.4  | 37.9  | 41.9                         |
| Upper                                                                            | 40                               | 38.1  | 40.7  | 9,453   | 39.4  | 43.7  | 56   | 44.8  | 47.0  | 13,818  | 48.4  | 53.0  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 105                              | 100.0 | 100.0 | 23,994  | 100.0 | 100.0 | 125  | 100.0 | 100.0 | 28,567  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D36B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Santa Cruz MSA                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | %     | #%    | \$(000) | %     | \$%   | #    | %     | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.4   | 0       | 0.0   | 1.5   | 0    | 0.0   | 0.5   | 0       | 0.0   | 0.0   | 2.3                          |
| Moderate                                                                         | 3                                | 8.8   | 8.5   | 492     | 6.1   | 6.3   | 3    | 9.1   | 5.9   | 619     | 7.2   | 4.1   | 9.7                          |
| Middle                                                                           | 19                               | 55.9  | 42.7  | 5,287   | 65.9  | 43.9  | 16   | 48.5  | 37.3  | 4,244   | 49.6  | 36.7  | 41.9                         |
| Upper                                                                            | 12                               | 35.3  | 47.4  | 2,242   | 28.0  | 48.3  | 14   | 42.4  | 56.4  | 3,700   | 43.2  | 59.2  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 34                               | 100.0 | 100.0 | 8,021   | 100.0 | 100.0 | 33   | 100.0 | 100.0 | 8,563   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.1   | 0       | 0.0   | 0.4   | 0    | 0.0   | 2.8   | 0       | 0.0   | 0.8   | 2.3                          |
| Moderate                                                                         | 0                                | 0.0   | 13.2  | 0       | 0.0   | 13.1  | 0    | 0.0   | 6.3   | 0       | 0.0   | 5.9   | 9.7                          |
| Middle                                                                           | 0                                | 0.0   | 42.6  | 0       | 0.0   | 44.1  | 0    | 0.0   | 39.4  | 0       | 0.0   | 49.3  | 41.9                         |
| Upper                                                                            | 0                                | 0.0   | 43.2  | 0       | 0.0   | 42.4  | 0    | 0.0   | 51.4  | 0       | 0.0   | 43.9  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 6.1   | 0       | 0.0   | 8.7   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2.3                          |
| Moderate                                                                         | 0                                | 0.0   | 33.3  | 0       | 0.0   | 38.4  | 0    | 0.0   | 37.5  | 0       | 0.0   | 25.9  | 9.7                          |
| Middle                                                                           | 0                                | 0.0   | 39.4  | 0       | 0.0   | 39.4  | 0    | 0.0   | 50.0  | 0       | 0.0   | 63.4  | 41.9                         |
| Upper                                                                            | 0                                | 0.0   | 21.2  | 0       | 0.0   | 13.6  | 0    | 0.0   | 12.5  | 0       | 0.0   | 10.6  | 46.1                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |



Table D37A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Santa Cruz MSA                                                  |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                                                         |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.7   | 0       | 0.0   | 1.9   | 2.5                          |
| Moderate                                                                                                                                                    | 1                        | 33.3  | 11.5  | 223     | 25.5  | 9.1   | 17.2                         |
| Middle                                                                                                                                                      | 2                        | 66.7  | 43.6  | 653     | 74.5  | 43.2  | 41.1                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 42.1  | 0       | 0.0   | 45.8  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 3                        | 100.0 | 100.0 | 876     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                                             |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 2                        | 6.1   | 2.3   | 699     | 6.3   | 1.9   | 2.5                          |
| Moderate                                                                                                                                                    | 10                       | 30.3  | 15.1  | 2,831   | 25.4  | 12.5  | 17.2                         |
| Middle                                                                                                                                                      | 7                        | 21.2  | 42.2  | 1,826   | 16.4  | 42.0  | 41.1                         |
| Upper                                                                                                                                                       | 14                       | 42.4  | 40.5  | 5,808   | 52.0  | 43.5  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 33                       | 100.0 | 100.0 | 11,164  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 1.9   | 0       | 0.0   | 2.1   | 2.5                          |
| Moderate                                                                                                                                                    | 2                        | 7.4   | 9.2   | 386     | 6.9   | 10.1  | 17.2                         |
| Middle                                                                                                                                                      | 12                       | 44.4  | 44.4  | 2,052   | 36.5  | 45.0  | 41.1                         |
| Upper                                                                                                                                                       | 13                       | 48.1  | 44.6  | 3,177   | 56.6  | 42.9  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 27                       | 100.0 | 100.0 | 5,615   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                                           |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                                         | 0                        | 0.0   | 14.3  | 0       | 0.0   | 47.3  | 17.8                         |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 26.2  | 0       | 0.0   | 16.3  | 23.0                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 54.8  | 0       | 0.0   | 35.9  | 47.8                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 4.8   | 0       | 0.0   | 0.4   | 11.5                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                                                   |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                                         | 2                        | 2.2   | 2.3   | 699     | 2.8   | 3.9   | 2.5                          |
| Moderate                                                                                                                                                    | 14                       | 15.4  | 14.4  | 3,540   | 14.2  | 12.0  | 17.2                         |
| Middle                                                                                                                                                      | 36                       | 39.6  | 42.5  | 7,611   | 30.5  | 42.0  | 41.1                         |
| Upper                                                                                                                                                       | 39                       | 42.9  | 40.8  | 13,101  | 52.5  | 42.2  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 91                       | 100.0 | 100.0 | 24,951  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

Table D37B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Santa Cruz MSA                                                  |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.2   | 2.5                          |
| Moderate                                                                                                                                                    | 1                        | 3.6   | 8.6   | 100     | 1.4   | 7.1   | 17.2                         |
| Middle                                                                                                                                                      | 15                       | 53.6  | 40.7  | 3,080   | 42.2  | 36.9  | 41.1                         |
| Upper                                                                                                                                                       | 12                       | 42.9  | 50.2  | 4,116   | 56.4  | 55.8  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 28                       | 100.0 | 100.0 | 7,296   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 1.4   | 0       | 0.0   | 1.3   | 2.5                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 18.3  | 0       | 0.0   | 11.6  | 17.2                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 42.3  | 0       | 0.0   | 45.9  | 41.1                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 38.0  | 0       | 0.0   | 41.1  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.5   | 0       | 0.0   | 2.7   | 2.5                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 27.2  | 0       | 0.0   | 20.0  | 17.2                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 34.6  | 0       | 0.0   | 33.4  | 41.1                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 35.8  | 0       | 0.0   | 43.8  | 39.1                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

Table D38

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Santa Cruz MSA                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 11                               | 8.0   | 3.8   | 1,484   | 7.4   | 4.1   | 8    | 13.6  | 5.9   | 875     | 6.7   | 10.9  | 5.5                      |
| Moderate                                                                                                                                                                                  | 33                               | 23.9  | 17.4  | 5,303   | 26.5  | 17.9  | 8    | 13.6  | 9.4   | 2,325   | 17.9  | 9.0   | 11.4                     |
| Middle                                                                                                                                                                                    | 57                               | 41.3  | 44.6  | 7,041   | 35.2  | 42.5  | 25   | 42.4  | 44.6  | 5,062   | 39.0  | 41.8  | 46.2                     |
| Upper                                                                                                                                                                                     | 37                               | 26.8  | 32.0  | 6,195   | 30.9  | 34.9  | 18   | 30.5  | 38.7  | 4,703   | 36.3  | 38.0  | 37.0                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 138                              | 100.0 | 100.0 | 20,023  | 100.0 | 100.0 | 59   | 100.0 | 100.0 | 12,965  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D39**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Santa Cruz MSA                                                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| <b>Low</b>                                                                                                                                                                                | 16                       | 6.7   | 3.9   | 1,864   | 6.1   | 4.3   | 4.0                      |
| <b>Moderate</b>                                                                                                                                                                           | 49                       | 20.6  | 16.4  | 6,396   | 20.8  | 19.5  | 15.5                     |
| <b>Middle</b>                                                                                                                                                                             | 103                      | 43.3  | 46.1  | 13,186  | 43.0  | 42.8  | 48.4                     |
| <b>Upper</b>                                                                                                                                                                              | 70                       | 29.4  | 32.0  | 9,231   | 30.1  | 31.5  | 32.1                     |
| <b>Unknown</b>                                                                                                                                                                            | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| <b>Total</b>                                                                                                                                                                              | 238                      | 100.0 | 100.0 | 30,677  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D40A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Santa Cruz MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                 | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.2   | 22.1                              |
| Moderate                                                                                                        | 0                                | 0.0   | 5.4   | 0       | 0.0   | 2.6   | 0    | 0.0   | 6.4   | 0       | 0.0   | 2.5   | 16.7                              |
| Middle                                                                                                          | 0                                | 0.0   | 16.7  | 0       | 0.0   | 12.2  | 0    | 0.0   | 12.8  | 0       | 0.0   | 8.3   | 19.3                              |
| Upper                                                                                                           | 0                                | 0.0   | 66.7  | 0       | 0.0   | 73.9  | 3    | 100.0 | 66.1  | 808     | 100.0 | 75.2  | 42.0                              |
| Unknown                                                                                                         | 0                                | 0.0   | 10.4  | 0       | 0.0   | 11.0  | 0    | 0.0   | 13.9  | 0       | 0.0   | 13.8  | 0.0                               |
| Total                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 3    | 100.0 | 100.0 | 808     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 3                                | 13.6  | 5.0   | 635     | 10.4  | 3.3   | 3    | 15.8  | 9.8   | 491     | 8.0   | 7.4   | 22.1                              |
| Moderate                                                                                                        | 5                                | 22.7  | 13.0  | 731     | 11.9  | 8.5   | 4    | 21.1  | 13.4  | 750     | 12.2  | 8.6   | 16.7                              |
| Middle                                                                                                          | 5                                | 22.7  | 21.8  | 1,400   | 22.9  | 18.7  | 3    | 15.8  | 18.4  | 900     | 14.7  | 14.5  | 19.3                              |
| Upper                                                                                                           | 8                                | 36.4  | 48.2  | 3,053   | 49.9  | 56.9  | 9    | 47.4  | 45.9  | 4,002   | 65.1  | 55.6  | 42.0                              |
| Unknown                                                                                                         | 1                                | 4.5   | 11.9  | 305     | 5.0   | 12.6  | 0    | 0.0   | 12.5  | 0       | 0.0   | 13.9  | 0.0                               |
| Total                                                                                                           | 22                               | 100.0 | 100.0 | 6,124   | 100.0 | 100.0 | 19   | 100.0 | 100.0 | 6,143   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 0                                | 0.0   | 4.0   | 0       | 0.0   | 2.7   | 2    | 2.9   | 4.0   | 75      | 0.6   | 2.6   | 22.1                              |
| Moderate                                                                                                        | 4                                | 8.2   | 11.0  | 382     | 3.9   | 9.6   | 12   | 17.1  | 8.3   | 1,490   | 11.4  | 6.5   | 16.7                              |
| Middle                                                                                                          | 10                               | 20.4  | 19.8  | 1,602   | 16.3  | 18.3  | 15   | 21.4  | 21.8  | 2,167   | 16.6  | 16.4  | 19.3                              |
| Upper                                                                                                           | 35                               | 71.4  | 62.5  | 7,865   | 79.9  | 66.2  | 41   | 58.6  | 63.3  | 9,321   | 71.4  | 70.6  | 42.0                              |
| Unknown                                                                                                         | 0                                | 0.0   | 2.7   | 0       | 0.0   | 3.2   | 0    | 0.0   | 2.6   | 0       | 0.0   | 3.9   | 0.0                               |
| Total                                                                                                           | 49                               | 100.0 | 100.0 | 9,849   | 100.0 | 100.0 | 70   | 100.0 | 100.0 | 13,053  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 4                                | 3.8   | 4.2   | 857     | 3.6   | 2.5   | 6    | 4.8   | 5.4   | 613     | 2.1   | 3.5   | 22.1                              |
| Moderate                                                                                                        | 12                               | 11.4  | 11.4  | 1,469   | 6.1   | 6.8   | 18   | 14.4  | 9.5   | 2,338   | 8.2   | 5.0   | 16.7                              |
| Middle                                                                                                          | 20                               | 19.0  | 20.4  | 3,730   | 15.5  | 16.6  | 23   | 18.4  | 16.7  | 4,349   | 15.2  | 11.2  | 19.3                              |
| Upper                                                                                                           | 68                               | 64.8  | 52.7  | 17,633  | 73.5  | 62.0  | 77   | 61.6  | 56.9  | 21,217  | 74.3  | 66.8  | 42.0                              |
| Unknown                                                                                                         | 1                                | 1.0   | 11.3  | 305     | 1.3   | 12.1  | 1    | 0.8   | 11.5  | 50      | 0.2   | 13.5  | 0.0                               |
| Total                                                                                                           | 105                              | 100.0 | 100.0 | 23,994  | 100.0 | 100.0 | 125  | 100.0 | 100.0 | 28,567  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D40B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Santa Cruz MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                 | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 1                                | 2.9   | 3.3   | 222     | 2.8   | 5.6   | 1    | 3.0   | 5.5   | 47      | 0.5   | 9.2   | 22.1                              |
| Moderate                                                                                                        | 3                                | 8.8   | 12.3  | 356     | 4.4   | 6.6   | 2    | 6.1   | 6.4   | 98      | 1.1   | 2.7   | 16.7                              |
| Middle                                                                                                          | 5                                | 14.7  | 9.0   | 728     | 9.1   | 5.7   | 5    | 15.2  | 19.5  | 1,282   | 15.0  | 11.7  | 19.3                              |
| Upper                                                                                                           | 25                               | 73.5  | 72.0  | 6,715   | 83.7  | 78.0  | 24   | 72.7  | 60.5  | 7,086   | 82.8  | 67.9  | 42.0                              |
| Unknown                                                                                                         | 0                                | 0.0   | 3.3   | 0       | 0.0   | 4.1   | 1    | 3.0   | 8.2   | 50      | 0.6   | 8.5   | 0.0                               |
| Total                                                                                                           | 34                               | 100.0 | 100.0 | 8,021   | 100.0 | 100.0 | 33   | 100.0 | 100.0 | 8,563   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 0                                | 0.0   | 7.4   | 0       | 0.0   | 4.6   | 0    | 0.0   | 8.5   | 0       | 0.0   | 3.7   | 22.1                              |
| Moderate                                                                                                        | 0                                | 0.0   | 5.8   | 0       | 0.0   | 2.4   | 0    | 0.0   | 2.8   | 0       | 0.0   | 0.7   | 16.7                              |
| Middle                                                                                                          | 0                                | 0.0   | 16.3  | 0       | 0.0   | 8.2   | 0    | 0.0   | 16.2  | 0       | 0.0   | 8.9   | 19.3                              |
| Upper                                                                                                           | 0                                | 0.0   | 63.2  | 0       | 0.0   | 75.9  | 0    | 0.0   | 65.5  | 0       | 0.0   | 68.4  | 42.0                              |
| Unknown                                                                                                         | 0                                | 0.0   | 7.4   | 0       | 0.0   | 8.9   | 0    | 0.0   | 7.0   | 0       | 0.0   | 18.3  | 0.0                               |
| Total                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 22.1                              |
| Moderate                                                                                                        | 0                                | 0.0   | 3.0   | 0       | 0.0   | 2.8   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 16.7                              |
| Middle                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.3                              |
| Upper                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 12.5  | 0       | 0.0   | 25.7  | 42.0                              |
| Unknown                                                                                                         | 0                                | 0.0   | 97.0  | 0       | 0.0   | 97.2  | 0    | 0.0   | 87.5  | 0       | 0.0   | 74.3  | 0.0                               |
| Total                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D41A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Santa Cruz MSA |                          |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                            | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                        | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                        | #                        | #%    | #%    | \$(000) | %     | \$%   |                                   |
| Home Purchase Loans                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                    | 0                        | 0.0   | 1.4   | 0       | 0.0   | 0.4   | 23.1                              |
| Moderate                                                                                               | 0                        | 0.0   | 6.8   | 0       | 0.0   | 3.6   | 17.0                              |
| Middle                                                                                                 | 1                        | 33.3  | 18.1  | 223     | 25.5  | 13.8  | 18.0                              |
| Upper                                                                                                  | 2                        | 66.7  | 67.6  | 653     | 74.5  | 76.0  | 41.9                              |
| Unknown                                                                                                | 0                        | 0.0   | 6.1   | 0       | 0.0   | 6.1   | 0.0                               |
| Total                                                                                                  | 3                        | 100.0 | 100.0 | 876     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                    | 3                        | 9.1   | 3.6   | 573     | 5.1   | 2.1   | 23.1                              |
| Moderate                                                                                               | 3                        | 9.1   | 12.6  | 512     | 4.6   | 8.8   | 17.0                              |
| Middle                                                                                                 | 7                        | 21.2  | 23.4  | 2,670   | 23.9  | 20.8  | 18.0                              |
| Upper                                                                                                  | 16                       | 48.5  | 51.8  | 6,372   | 57.1  | 58.8  | 41.9                              |
| Unknown                                                                                                | 4                        | 12.1  | 8.7   | 1,037   | 9.3   | 9.6   | 0.0                               |
| Total                                                                                                  | 33                       | 100.0 | 100.0 | 11,164  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                    | 1                        | 3.7   | 3.3   | 100     | 1.8   | 2.5   | 23.1                              |
| Moderate                                                                                               | 2                        | 7.4   | 9.2   | 292     | 5.2   | 9.1   | 17.0                              |
| Middle                                                                                                 | 6                        | 22.2  | 23.7  | 1,158   | 20.6  | 22.0  | 18.0                              |
| Upper                                                                                                  | 18                       | 66.7  | 60.3  | 4,065   | 72.4  | 59.5  | 41.9                              |
| Unknown                                                                                                | 0                        | 0.0   | 3.5   | 0       | 0.0   | 6.9   | 0.0                               |
| Total                                                                                                  | 27                       | 100.0 | 100.0 | 5,615   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                    | 4                        | 4.4   | 3.3   | 673     | 2.7   | 1.8   | 23.1                              |
| Moderate                                                                                               | 7                        | 7.7   | 11.3  | 994     | 4.0   | 7.6   | 17.0                              |
| Middle                                                                                                 | 17                       | 18.7  | 22.3  | 4,309   | 17.3  | 19.1  | 18.0                              |
| Upper                                                                                                  | 59                       | 64.8  | 54.6  | 17,938  | 71.9  | 62.5  | 41.9                              |
| Unknown                                                                                                | 4                        | 4.4   | 8.5   | 1,037   | 4.2   | 9.1   | 0.0                               |
| Total                                                                                                  | 91                       | 100.0 | 100.0 | 24,951  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                         |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                         |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                              |                          |       |       |         |       |       |                                   |

Table D41B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Santa Cruz MSA                                     |                          |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                     | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                       |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 8.1   | 0       | 0.0   | 11.1  | 23.1                              |
| Moderate                                                            | 2                        | 7.1   | 7.7   | 190     | 2.6   | 4.9   | 17.0                              |
| Middle                                                              | 3                        | 10.7  | 19.6  | 258     | 3.5   | 14.4  | 18.0                              |
| Upper                                                               | 23                       | 82.1  | 60.8  | 6,848   | 93.9  | 64.7  | 41.9                              |
| Unknown                                                             | 0                        | 0.0   | 3.8   | 0       | 0.0   | 4.9   | 0.0                               |
| Total                                                               | 28                       | 100.0 | 100.0 | 7,296   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                         |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 2.1   | 0       | 0.0   | 1.4   | 23.1                              |
| Moderate                                                            | 0                        | 0.0   | 8.5   | 0       | 0.0   | 3.8   | 17.0                              |
| Middle                                                              | 0                        | 0.0   | 22.5  | 0       | 0.0   | 13.4  | 18.0                              |
| Upper                                                               | 0                        | 0.0   | 64.8  | 0       | 0.0   | 79.4  | 41.9                              |
| Unknown                                                             | 0                        | 0.0   | 2.1   | 0       | 0.0   | 2.0   | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                              |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 23.1                              |
| Moderate                                                            | 0                        | 0.0   | 1.2   | 0       | 0.0   | 1.2   | 17.0                              |
| Middle                                                              | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.0                              |
| Upper                                                               | 0                        | 0.0   | 1.2   | 0       | 0.0   | 1.5   | 41.9                              |
| Unknown                                                             | 0                        | 0.0   | 97.5  | 0       | 0.0   | 97.3  | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.      |                          |       |       |         |       |       |                                   |

**Table D42**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Santa Cruz MSA                                                                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                                                                                       | 72                               | 52.2  | 51.3  | 8,057   | 40.2  | 29.9  | 21   | 35.6  | 53.3  | 3,638   | 28.1  | 32.8  | 93.5                     |
| Over \$1 Million                                                                                                                                                                          | 39                               | 28.3  |       | 9,367   | 46.8  |       | 32   | 54.2  |       | 6,795   | 52.4  |       | 6.0                      |
| Revenue Unknown                                                                                                                                                                           | 27                               | 19.6  |       | 2,599   | 13.0  |       | 6    | 10.2  |       | 2,532   | 19.5  |       | 0.5                      |
| Total                                                                                                                                                                                     | 138                              | 100.0 |       | 20,023  | 100.0 |       | 59   | 100.0 |       | 12,965  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 81                               | 58.7  | 96.0  | 3,888   | 19.4  | 51.1  | 25   | 42.4  | 95.4  | 1,876   | 14.5  | 42.3  |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 39                               | 28.3  | 2.5   | 6,917   | 34.5  | 16.5  | 20   | 33.9  | 2.3   | 3,952   | 30.5  | 13.4  |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 18                               | 13.0  | 1.5   | 9,218   | 46.0  | 32.4  | 14   | 23.7  | 2.3   | 7,137   | 55.0  | 44.2  |                          |
| Total                                                                                                                                                                                     | 138                              | 100.0 | 100.0 | 20,023  | 100.0 | 100.0 | 59   | 100.0 | 100.0 | 12,965  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 50                               | 69.4  |       | 2,197   | 27.3  |       | 10   | 47.6  |       | 696     | 19.1  |       |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 15                               | 20.8  |       | 2,794   | 34.7  |       | 9    | 42.9  |       | 1,677   | 46.1  |       |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 7                                | 9.7   |       | 3,066   | 38.1  |       | 2    | 9.5   |       | 1,265   | 34.8  |       |                          |
| Total                                                                                                                                                                                     | 72                               | 100.0 |       | 8,057   | 100.0 |       | 21   | 100.0 |       | 3,638   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D43**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Santa Cruz MSA                                                                                         |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 133                      | 55.9  | 44.3  | 11,679  | 38.1  | 31.5  | 93.3                     |
| Over \$1 Million                                                                                                        | 59                       | 24.8  |       | 14,880  | 48.5  |       | 6.3                      |
| Revenue Unknown                                                                                                         | 46                       | 19.3  |       | 4,118   | 13.4  |       | 0.4                      |
| Total                                                                                                                   | 238                      | 100.0 |       | 30,677  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 163                      | 68.5  | 93.1  | 6,930   | 22.6  | 50.2  |                          |
| \$100,001 - \$250,000                                                                                                   | 45                       | 18.9  | 4.6   | 7,305   | 23.8  | 18.9  |                          |
| \$250,001 - \$1 Million                                                                                                 | 30                       | 12.6  | 2.3   | 16,442  | 53.6  | 30.8  |                          |
| Total                                                                                                                   | 238                      | 100.0 | 100.0 | 30,677  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 105                      | 78.9  |       | 4,240   | 36.3  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 21                       | 15.8  |       | 3,512   | 30.1  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 7                        | 5.3   |       | 3,927   | 33.6  |       |                          |
| Total                                                                                                                   | 133                      | 100.0 |       | 11,679  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |



**Table D44**

| 2022 Combined Demographics                                                                                                                                                                |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Ventura County MSA                                                                                                                                                       |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 9                         | 4.7                   | 7,584                              | 3.9       | 1,635                                              | 21.6      | 43,215                    | 22.0      |
| Moderate                                                                                                                                                                                  | 46                        | 24.2                  | 42,875                             | 21.8      | 4,249                                              | 9.9       | 32,443                    | 16.5      |
| Middle                                                                                                                                                                                    | 77                        | 40.5                  | 81,858                             | 41.7      | 4,365                                              | 5.3       | 40,828                    | 20.8      |
| Upper                                                                                                                                                                                     | 55                        | 28.9                  | 63,333                             | 32.3      | 1,635                                              | 2.6       | 79,826                    | 40.7      |
| Unknown                                                                                                                                                                                   | 3                         | 1.6                   | 662                                | 0.3       | 34                                                 | 5.1       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 190                       | 100.0                 | 196,312                            | 100.0     | 11,918                                             | 6.1       | 196,312                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 9,697                     | 3,038                 | 1.8                                | 31.3      | 5,976                                              | 61.6      | 683                       | 7.0       |
| Moderate                                                                                                                                                                                  | 62,889                    | 28,501                | 16.6                               | 45.3      | 29,971                                             | 47.7      | 4,417                     | 7.0       |
| Middle                                                                                                                                                                                    | 127,663                   | 74,681                | 43.4                               | 58.5      | 46,066                                             | 36.1      | 6,916                     | 5.4       |
| Upper                                                                                                                                                                                     | 87,640                    | 65,459                | 38.0                               | 74.7      | 16,982                                             | 19.4      | 5,199                     | 5.9       |
| Unknown                                                                                                                                                                                   | 1,536                     | 358                   | 0.2                                | 23.3      | 607                                                | 39.5      | 571                       | 37.2      |
| Total AA                                                                                                                                                                                  | 289,425                   | 172,037               | 100.0                              | 59.4      | 99,602                                             | 34.4      | 17,786                    | 6.1       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 1,335                     | 3.2                   | 1,154                              | 3.0       | 173                                                | 5.9       | 8                         | 4.1       |
| Moderate                                                                                                                                                                                  | 7,166                     | 17.0                  | 6,581                              | 16.9      | 554                                                | 18.9      | 31                        | 15.7      |
| Middle                                                                                                                                                                                    | 18,954                    | 45.1                  | 17,445                             | 44.8      | 1,434                                              | 48.9      | 75                        | 38.1      |
| Upper                                                                                                                                                                                     | 14,483                    | 34.4                  | 13,634                             | 35.0      | 766                                                | 26.1      | 83                        | 42.1      |
| Unknown                                                                                                                                                                                   | 119                       | 0.3                   | 116                                | 0.3       | 3                                                  | 0.1       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 42,057                    | 100.0                 | 38,930                             | 100.0     | 2,930                                              | 100.0     | 197                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.6      |                                                    | 7.0       |                           | 0.5       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 21                        | 3.2                   | 15                                 | 2.6       | 6                                                  | 7.7       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 166                       | 25.6                  | 133                                | 23.3      | 33                                                 | 42.3      | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 253                       | 39.0                  | 228                                | 39.9      | 25                                                 | 32.1      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 208                       | 32.0                  | 194                                | 34.0      | 14                                                 | 17.9      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 1                         | 0.2                   | 1                                  | 0.2       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 649                       | 100.0                 | 571                                | 100.0     | 78                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 88.0      |                                                    | 12.0      |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table D45**

| 2021 Combined Demographics                                                                                                                                                                |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Ventura County MSA                                                                                                                                                       |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 9                         | 5.2                   | 6,791                              | 3.4       | 1,924                                              | 28.3      | 43,971                    | 22.2      |
| Moderate                                                                                                                                                                                  | 50                        | 28.7                  | 51,183                             | 25.8      | 7,590                                              | 14.8      | 33,839                    | 17.1      |
| Middle                                                                                                                                                                                    | 61                        | 35.1                  | 75,440                             | 38.1      | 4,413                                              | 5.8       | 39,513                    | 20.0      |
| Upper                                                                                                                                                                                     | 51                        | 29.3                  | 64,314                             | 32.5      | 1,673                                              | 2.6       | 80,724                    | 40.8      |
| Unknown                                                                                                                                                                                   | 3                         | 1.7                   | 319                                | 0.2       | 43                                                 | 13.5      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 174                       | 100.0                 | 198,047                            | 100.0     | 15,643                                             | 7.9       | 198,047                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 9,601                     | 2,371                 | 1.4                                | 24.7      | 6,717                                              | 70.0      | 513                       | 5.3       |
| Moderate                                                                                                                                                                                  | 73,564                    | 33,096                | 19.2                               | 45.0      | 35,742                                             | 48.6      | 4,726                     | 6.4       |
| Middle                                                                                                                                                                                    | 113,231                   | 70,117                | 40.6                               | 61.9      | 36,765                                             | 32.5      | 6,349                     | 5.6       |
| Upper                                                                                                                                                                                     | 86,356                    | 66,786                | 38.7                               | 77.3      | 16,421                                             | 19.0      | 3,149                     | 3.6       |
| Unknown                                                                                                                                                                                   | 1,147                     | 239                   | 0.1                                | 20.8      | 715                                                | 62.3      | 193                       | 16.8      |
| Total AA                                                                                                                                                                                  | 283,899                   | 172,609               | 100.0                              | 60.8      | 96,360                                             | 33.9      | 14,930                    | 5.3       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 2,179                     | 5.2                   | 1,811                              | 4.7       | 362                                                | 12.3      | 6                         | 3.6       |
| Moderate                                                                                                                                                                                  | 8,185                     | 19.5                  | 7,666                              | 19.7      | 486                                                | 16.5      | 33                        | 19.8      |
| Middle                                                                                                                                                                                    | 17,028                    | 40.5                  | 15,661                             | 40.2      | 1,305                                              | 44.3      | 62                        | 37.1      |
| Upper                                                                                                                                                                                     | 14,433                    | 34.3                  | 13,585                             | 34.9      | 784                                                | 26.6      | 64                        | 38.3      |
| Unknown                                                                                                                                                                                   | 221                       | 0.5                   | 210                                | 0.5       | 9                                                  | 0.3       | 2                         | 1.2       |
| Total AA                                                                                                                                                                                  | 42,046                    | 100.0                 | 38,933                             | 100.0     | 2,946                                              | 100.0     | 167                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.6      |                                                    | 7.0       |                           | 0.4       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 42                        | 6.4                   | 31                                 | 5.4       | 11                                                 | 14.5      | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 163                       | 24.9                  | 132                                | 22.8      | 30                                                 | 39.5      | 1                         | 100.0     |
| Middle                                                                                                                                                                                    | 282                       | 43.1                  | 257                                | 44.5      | 25                                                 | 32.9      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 165                       | 25.2                  | 155                                | 26.8      | 10                                                 | 13.2      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 3                         | 0.5                   | 3                                  | 0.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 655                       | 100.0                 | 578                                | 100.0     | 76                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 88.2      |                                                    | 11.6      |                           | 0.2       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table D46**

| 2020 Combined Demographics<br>Assessment Area: Ventura County MSA                                                                                                                         |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 9                         | 5.2                   | 6,791                              | 3.4       | 1,924                                              | 28.3      | 43,971                    | 22.2      |
| Moderate                                                                                                                                                                                  | 50                        | 28.7                  | 51,183                             | 25.8      | 7,590                                              | 14.8      | 33,839                    | 17.1      |
| Middle                                                                                                                                                                                    | 61                        | 35.1                  | 75,440                             | 38.1      | 4,413                                              | 5.8       | 39,513                    | 20.0      |
| Upper                                                                                                                                                                                     | 51                        | 29.3                  | 64,314                             | 32.5      | 1,673                                              | 2.6       | 80,724                    | 40.8      |
| Unknown                                                                                                                                                                                   | 3                         | 1.7                   | 319                                | 0.2       | 43                                                 | 13.5      | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 174                       | 100.0                 | 198,047                            | 100.0     | 15,643                                             | 7.9       | 198,047                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 9,601                     | 2,371                 | 1.4                                | 24.7      | 6,717                                              | 70.0      | 513                       | 5.3       |
| Moderate                                                                                                                                                                                  | 73,564                    | 33,096                | 19.2                               | 45.0      | 35,742                                             | 48.6      | 4,726                     | 6.4       |
| Middle                                                                                                                                                                                    | 113,231                   | 70,117                | 40.6                               | 61.9      | 36,765                                             | 32.5      | 6,349                     | 5.6       |
| Upper                                                                                                                                                                                     | 86,356                    | 66,786                | 38.7                               | 77.3      | 16,421                                             | 19.0      | 3,149                     | 3.6       |
| Unknown                                                                                                                                                                                   | 1,147                     | 239                   | 0.1                                | 20.8      | 715                                                | 62.3      | 193                       | 16.8      |
| Total AA                                                                                                                                                                                  | 283,899                   | 172,609               | 100.0                              | 60.8      | 96,360                                             | 33.9      | 14,930                    | 5.3       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 2,243                     | 5.3                   | 1,873                              | 4.8       | 364                                                | 11.9      | 6                         | 3.6       |
| Moderate                                                                                                                                                                                  | 8,313                     | 19.5                  | 7,774                              | 19.7      | 503                                                | 16.5      | 36                        | 21.7      |
| Middle                                                                                                                                                                                    | 17,221                    | 40.4                  | 15,800                             | 40.1      | 1,361                                              | 44.7      | 60                        | 36.1      |
| Upper                                                                                                                                                                                     | 14,625                    | 34.3                  | 13,754                             | 34.9      | 809                                                | 26.6      | 62                        | 37.3      |
| Unknown                                                                                                                                                                                   | 229                       | 0.5                   | 217                                | 0.6       | 10                                                 | 0.3       | 2                         | 1.2       |
| Total AA                                                                                                                                                                                  | 42,631                    | 100.0                 | 39,418                             | 100.0     | 3,047                                              | 100.0     | 166                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.5      |                                                    | 7.1       |                           | 0.4       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 40                        | 6.0                   | 28                                 | 4.8       | 12                                                 | 15.0      | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 170                       | 25.5                  | 138                                | 23.6      | 31                                                 | 38.8      | 1                         | 100.0     |
| Middle                                                                                                                                                                                    | 286                       | 42.9                  | 260                                | 44.4      | 26                                                 | 32.5      | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 168                       | 25.2                  | 157                                | 26.8      | 11                                                 | 13.8      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 2                         | 0.3                   | 2                                  | 0.3       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 666                       | 100.0                 | 585                                | 100.0     | 80                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 87.8      |                                                    | 12.0      |                           | 0.2       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

Table D47A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ventura County MSA                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.4   | 0       | 0.0   | 1.1   | 0    | 0.0   | 1.6   | 0       | 0.0   | 1.1   | 1.8                          |
| Moderate                                                                         | 2                                | 100.0 | 22.0  | 915     | 100.0 | 17.1  | 1    | 50.0  | 20.1  | 449     | 10.1  | 14.7  | 16.6                         |
| Middle                                                                           | 0                                | 0.0   | 39.2  | 0       | 0.0   | 36.7  | 0    | 0.0   | 43.8  | 0       | 0.0   | 43.4  | 43.4                         |
| Upper                                                                            | 0                                | 0.0   | 37.2  | 0       | 0.0   | 44.9  | 1    | 50.0  | 34.2  | 4,000   | 89.9  | 40.3  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                            | 2                                | 100.0 | 100.0 | 915     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 4,449   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.1   | 0       | 0.0   | 0.8   | 0    | 0.0   | 1.5   | 0       | 0.0   | 1.1   | 1.8                          |
| Moderate                                                                         | 2                                | 33.3  | 17.4  | 778     | 36.9  | 14.0  | 2    | 25.0  | 16.5  | 718     | 18.8  | 13.2  | 16.6                         |
| Middle                                                                           | 0                                | 0.0   | 40.9  | 0       | 0.0   | 37.7  | 2    | 25.0  | 42.5  | 348     | 9.1   | 38.1  | 43.4                         |
| Upper                                                                            | 4                                | 66.7  | 40.3  | 1,332   | 63.1  | 47.3  | 4    | 50.0  | 39.2  | 2,752   | 72.1  | 47.0  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                            | 6                                | 100.0 | 100.0 | 2,110   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 3,818   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 1                                | 3.3   | 1.1   | 100     | 1.9   | 0.8   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.8   | 1.8                          |
| Moderate                                                                         | 1                                | 3.3   | 12.4  | 100     | 1.9   | 11.1  | 3    | 5.9   | 11.5  | 387     | 4.2   | 9.5   | 16.6                         |
| Middle                                                                           | 11                               | 36.7  | 35.5  | 1,388   | 26.4  | 33.5  | 18   | 35.3  | 40.9  | 2,830   | 30.9  | 37.2  | 43.4                         |
| Upper                                                                            | 17                               | 56.7  | 50.7  | 3,664   | 69.8  | 54.3  | 30   | 58.8  | 46.3  | 5,942   | 64.9  | 51.9  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.6   | 0.2                          |
| Total                                                                            | 30                               | 100.0 | 100.0 | 5,252   | 100.0 | 100.0 | 51   | 100.0 | 100.0 | 9,159   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 14.8  | 0       | 0.0   | 3.1   | 0    | 0.0   | 9.2   | 0       | 0.0   | 7.9   | 4.7                          |
| Moderate                                                                         | 0                                | 0.0   | 51.9  | 0       | 0.0   | 36.2  | 0    | 0.0   | 44.7  | 0       | 0.0   | 42.5  | 32.6                         |
| Middle                                                                           | 0                                | 0.0   | 22.2  | 0       | 0.0   | 30.6  | 0    | 0.0   | 38.2  | 0       | 0.0   | 36.0  | 49.2                         |
| Upper                                                                            | 0                                | 0.0   | 9.3   | 0       | 0.0   | 28.2  | 0    | 0.0   | 7.9   | 0       | 0.0   | 13.7  | 13.5                         |
| Unknown                                                                          | 0                                | 0.0   | 1.9   | 0       | 0.0   | 1.8   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 1                                | 1.9   | 1.2   | 100     | 0.9   | 0.9   | 0    | 0.0   | 1.5   | 0       | 0.0   | 1.5   | 1.8                          |
| Moderate                                                                         | 5                                | 9.6   | 18.3  | 1,793   | 15.9  | 15.4  | 7    | 9.6   | 17.5  | 1,646   | 8.3   | 15.3  | 16.6                         |
| Middle                                                                           | 15                               | 28.8  | 40.3  | 2,162   | 19.1  | 37.1  | 23   | 31.5  | 42.9  | 3,606   | 18.3  | 40.9  | 43.4                         |
| Upper                                                                            | 31                               | 59.6  | 40.1  | 7,238   | 64.1  | 46.4  | 43   | 58.9  | 37.7  | 14,502  | 73.4  | 41.9  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                            | 52                               | 100.0 | 100.0 | 11,293  | 100.0 | 100.0 | 73   | 100.0 | 100.0 | 19,754  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D47B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ventura County MSA                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.6   | 1.8                          |
| Moderate                                                                         | 0                                | 0.0   | 8.2   | 0       | 0.0   | 6.2   | 1    | 8.3   | 12.1  | 92      | 4.0   | 8.0   | 16.6                         |
| Middle                                                                           | 4                                | 28.6  | 38.0  | 774     | 25.7  | 30.2  | 3    | 25.0  | 42.1  | 428     | 18.4  | 36.6  | 43.4                         |
| Upper                                                                            | 10                               | 71.4  | 53.3  | 2,242   | 74.3  | 63.2  | 8    | 66.7  | 44.7  | 1,808   | 77.7  | 54.4  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0.2                          |
| Total                                                                            | 14                               | 100.0 | 100.0 | 3,016   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 2,328   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.2   | 0    | 0.0   | 1.8   | 0       | 0.0   | 0.9   | 1.8                          |
| Moderate                                                                         | 0                                | 0.0   | 11.9  | 0       | 0.0   | 7.3   | 0    | 0.0   | 16.1  | 0       | 0.0   | 7.1   | 16.6                         |
| Middle                                                                           | 0                                | 0.0   | 38.4  | 0       | 0.0   | 28.3  | 0    | 0.0   | 43.5  | 0       | 0.0   | 37.8  | 43.4                         |
| Upper                                                                            | 0                                | 0.0   | 49.1  | 0       | 0.0   | 64.2  | 0    | 0.0   | 37.8  | 0       | 0.0   | 52.8  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.8   | 0       | 0.0   | 1.5   | 0.2                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.6   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.8                          |
| Moderate                                                                         | 0                                | 0.0   | 33.0  | 0       | 0.0   | 22.1  | 0    | 0.0   | 25.4  | 0       | 0.0   | 23.7  | 16.6                         |
| Middle                                                                           | 0                                | 0.0   | 38.3  | 0       | 0.0   | 40.6  | 0    | 0.0   | 45.8  | 0       | 0.0   | 42.1  | 43.4                         |
| Upper                                                                            | 0                                | 0.0   | 25.2  | 0       | 0.0   | 35.7  | 0    | 0.0   | 27.1  | 0       | 0.0   | 34.2  | 38.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.9   | 0       | 0.0   | 1.1   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.0   | 0.2                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D48A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Ventura County MSA                                     |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.5   | 0       | 0.0   | 1.1   | 1.4                          |
| Moderate                                                                | 2                        | 40.0  | 21.2  | 535     | 34.1  | 16.4  | 19.2                         |
| Middle                                                                  | 1                        | 20.0  | 39.2  | 400     | 25.5  | 36.8  | 40.6                         |
| Upper                                                                   | 2                        | 40.0  | 38.0  | 632     | 40.3  | 45.5  | 38.7                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                   | 5                        | 100.0 | 100.0 | 1,567   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.5   | 1.4                          |
| Moderate                                                                | 3                        | 21.4  | 16.3  | 780     | 4.7   | 13.3  | 19.2                         |
| Middle                                                                  | 2                        | 14.3  | 41.1  | 637     | 3.8   | 38.5  | 40.6                         |
| Upper                                                                   | 9                        | 64.3  | 41.8  | 15,247  | 91.5  | 47.5  | 38.7                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                   | 14                       | 100.0 | 100.0 | 16,664  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 1.4                          |
| Moderate                                                                | 1                        | 5.9   | 11.3  | 77      | 2.4   | 9.6   | 19.2                         |
| Middle                                                                  | 5                        | 29.4  | 37.7  | 713     | 22.3  | 36.3  | 40.6                         |
| Upper                                                                   | 11                       | 64.7  | 50.1  | 2,403   | 75.3  | 53.1  | 38.7                         |
| Unknown                                                                 | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.6   | 0.1                          |
| Total                                                                   | 17                       | 100.0 | 100.0 | 3,193   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 12.0  | 0       | 0.0   | 4.1   |                              |
| Moderate                                                                | 0                        | 0.0   | 39.0  | 0       | 0.0   | 29.0  | 42.3                         |
| Middle                                                                  | 0                        | 0.0   | 41.0  | 0       | 0.0   | 54.0  | 34.6                         |
| Upper                                                                   | 0                        | 0.0   | 5.0   | 0       | 0.0   | 11.9  | 14.2                         |
| Unknown                                                                 | 0                        | 0.0   | 3.0   | 0       | 0.0   | 1.0   | 1.1                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 1                        | 2.1   | 0.8   | 216     | 0.8   | 0.8   |                              |
| Moderate                                                                | 6                        | 12.8  | 17.0  | 1,392   | 5.4   | 14.3  | 19.2                         |
| Middle                                                                  | 10                       | 21.3  | 40.7  | 2,341   | 9.1   | 38.5  | 40.6                         |
| Upper                                                                   | 30                       | 63.8  | 41.3  | 21,822  | 84.7  | 46.2  | 38.7                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                   | 47                       | 100.0 | 100.0 | 25,771  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D48B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Ventura County MSA                                              |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 1                        | 9.1   | 0.6   | 216     | 5.0   | 0.5   | 1.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 7.4   | 0       | 0.0   | 4.8   | 19.2                         |
| Middle                                                                                                                                                      | 2                        | 18.2  | 38.7  | 591     | 13.6  | 33.2  | 40.6                         |
| Upper                                                                                                                                                       | 8                        | 72.7  | 53.3  | 3,540   | 81.4  | 61.6  | 38.7                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 11                       | 100.0 | 100.0 | 4,347   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 1.5   | 0       | 0.0   | 1.2   | 1.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 9.4   | 0       | 0.0   | 5.8   | 19.2                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 45.1  | 0       | 0.0   | 35.7  | 40.6                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 44.0  | 0       | 0.0   | 57.3  | 38.7                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.0   | 0       | 0.0   | 1.9   | 1.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 34.3  | 0       | 0.0   | 25.3  | 19.2                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 38.2  | 0       | 0.0   | 37.2  | 40.6                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 24.4  | 0       | 0.0   | 35.5  | 38.7                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

Table D49

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Ventura County MSA                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 1                                | 5.3   | 4.8   | 400     | 7.9   | 10.1  | 0    | 0.0   | 3.1   | 0       | 0.0   | 5.3   | 3.2                      |
| Moderate                                                                                                                                                                                  | 1                                | 5.3   | 18.9  | 100     | 2.0   | 17.4  | 6    | 26.1  | 15.8  | 772     | 17.3  | 16.7  | 17.0                     |
| Middle                                                                                                                                                                                    | 10                               | 52.6  | 39.7  | 3,255   | 64.3  | 42.2  | 10   | 43.5  | 44.6  | 1,973   | 44.2  | 46.3  | 45.1                     |
| Upper                                                                                                                                                                                     | 7                                | 36.8  | 35.5  | 1,307   | 25.8  | 29.8  | 7    | 30.4  | 35.8  | 1,715   | 38.5  | 31.4  | 34.4                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 0.3                      |
| Total                                                                                                                                                                                     | 19                               | 100.0 | 100.0 | 5,062   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 4,460   | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D50**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Ventura County MSA                                                                           |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| <b>Low</b>                                                                                                                                                                                | 1                        | 3.1   | 5.3   | 400     | 5.3   | 10.3  | 5.3                      |
| <b>Moderate</b>                                                                                                                                                                           | 4                        | 12.5  | 18.6  | 156     | 2.1   | 16.7  | 19.5                     |
| <b>Middle</b>                                                                                                                                                                             | 16                       | 50.0  | 40.4  | 5,812   | 77.3  | 42.7  | 40.4                     |
| <b>Upper</b>                                                                                                                                                                              | 11                       | 34.4  | 34.8  | 1,148   | 15.3  | 29.1  | 34.3                     |
| <b>Unknown</b>                                                                                                                                                                            | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.6   | 0.5                      |
| <b>Total</b>                                                                                                                                                                              | 32                       | 100.0 | 100.0 | 7,516   | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |



Table D51A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ventura County MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                     | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                     | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                     | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 1.0   | 0       | 0.0   | 0.5   | 0    | 0.0   | 1.3   | 0       | 0.0   | 0.5   | 22.0                              |
| Moderate                                                                                                            | 1                                | 50.0  | 7.4   | 434     | 47.4  | 4.2   | 0    | 0.0   | 7.6   | 0       | 0.0   | 3.7   | 16.5                              |
| Middle                                                                                                              | 1                                | 50.0  | 20.7  | 481     | 52.6  | 16.7  | 1    | 50.0  | 21.0  | 449     | 10.1  | 15.5  | 20.8                              |
| Upper                                                                                                               | 0                                | 0.0   | 53.7  | 0       | 0.0   | 61.6  | 1    | 50.0  | 52.5  | 4,000   | 89.9  | 57.8  | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 17.2  | 0       | 0.0   | 16.9  | 0    | 0.0   | 17.6  | 0       | 0.0   | 22.5  | 0.0                               |
| Total                                                                                                               | 2                                | 100.0 | 100.0 | 915     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 4,449   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 3.9   | 0       | 0.0   | 2.2   | 1    | 12.5  | 9.4   | 118     | 3.1   | 6.6   | 22.0                              |
| Moderate                                                                                                            | 1                                | 16.7  | 12.1  | 416     | 19.7  | 8.3   | 0    | 0.0   | 16.1  | 0       | 0.0   | 11.3  | 16.5                              |
| Middle                                                                                                              | 1                                | 16.7  | 21.3  | 362     | 17.2  | 18.4  | 1    | 12.5  | 21.7  | 100     | 2.6   | 18.4  | 20.8                              |
| Upper                                                                                                               | 4                                | 66.7  | 44.9  | 1,332   | 63.1  | 52.4  | 6    | 75.0  | 39.4  | 3,600   | 94.3  | 48.3  | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 17.7  | 0       | 0.0   | 18.6  | 0    | 0.0   | 13.3  | 0       | 0.0   | 15.3  | 0.0                               |
| Total                                                                                                               | 6                                | 100.0 | 100.0 | 2,110   | 100.0 | 100.0 | 8    | 100.0 | 100.0 | 3,818   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 4.4   | 0       | 0.0   | 3.0   | 0    | 0.0   | 4.0   | 0       | 0.0   | 3.8   | 22.0                              |
| Moderate                                                                                                            | 1                                | 3.3   | 9.5   | 200     | 3.8   | 7.7   | 3    | 5.9   | 10.0  | 477     | 5.2   | 6.5   | 16.5                              |
| Middle                                                                                                              | 5                                | 16.7  | 18.4  | 477     | 9.1   | 16.3  | 15   | 29.4  | 22.5  | 2,322   | 25.4  | 17.8  | 20.8                              |
| Upper                                                                                                               | 24                               | 80.0  | 63.4  | 4,575   | 87.1  | 67.9  | 33   | 64.7  | 57.1  | 6,360   | 69.4  | 65.1  | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 4.3   | 0       | 0.0   | 5.0   | 0    | 0.0   | 6.3   | 0       | 0.0   | 6.9   | 0.0                               |
| Total                                                                                                               | 30                               | 100.0 | 100.0 | 5,252   | 100.0 | 100.0 | 51   | 100.0 | 100.0 | 9,159   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 3.3   | 0       | 0.0   | 1.8   | 1    | 1.4   | 5.0   | 118     | 0.6   | 2.9   | 22.0                              |
| Moderate                                                                                                            | 3                                | 5.8   | 10.9  | 1,050   | 9.3   | 7.1   | 5    | 6.8   | 11.4  | 743     | 3.8   | 6.5   | 16.5                              |
| Middle                                                                                                              | 8                                | 15.4  | 21.0  | 1,363   | 12.1  | 17.8  | 18   | 24.7  | 21.4  | 3,072   | 15.6  | 16.4  | 20.8                              |
| Upper                                                                                                               | 41                               | 78.8  | 47.6  | 8,880   | 78.6  | 55.3  | 49   | 67.1  | 47.6  | 15,821  | 80.1  | 55.0  | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 17.2  | 0       | 0.0   | 18.0  | 0    | 0.0   | 14.5  | 0       | 0.0   | 19.3  | 0.0                               |
| Total                                                                                                               | 52                               | 100.0 | 100.0 | 11,293  | 100.0 | 100.0 | 73   | 100.0 | 100.0 | 19,754  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D51B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ventura County MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                     | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                     | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                     | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 5.5   | 0       | 0.0   | 6.5   | 0    | 0.0   | 4.0   | 0       | 0.0   | 5.2   | 22.0                              |
| Moderate                                                                                                            | 0                                | 0.0   | 7.0   | 0       | 0.0   | 3.8   | 2    | 16.7  | 10.5  | 266     | 11.4  | 5.7   | 16.5                              |
| Middle                                                                                                              | 1                                | 7.1   | 17.6  | 43      | 1.4   | 13.2  | 1    | 8.3   | 23.7  | 201     | 8.6   | 16.2  | 20.8                              |
| Upper                                                                                                               | 13                               | 92.9  | 66.3  | 2,973   | 98.6  | 68.7  | 9    | 75.0  | 53.8  | 1,861   | 79.9  | 65.8  | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 3.5   | 0       | 0.0   | 7.8   | 0    | 0.0   | 8.1   | 0       | 0.0   | 7.0   | 0.0                               |
| Total                                                                                                               | 14                               | 100.0 | 100.0 | 3,016   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 2,328   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 3.2   | 0       | 0.0   | 2.5   | 0    | 0.0   | 6.1   | 0       | 0.0   | 3.5   | 22.0                              |
| Moderate                                                                                                            | 0                                | 0.0   | 10.5  | 0       | 0.0   | 5.2   | 0    | 0.0   | 11.4  | 0       | 0.0   | 4.9   | 16.5                              |
| Middle                                                                                                              | 0                                | 0.0   | 17.3  | 0       | 0.0   | 10.0  | 0    | 0.0   | 17.5  | 0       | 0.0   | 7.9   | 20.8                              |
| Upper                                                                                                               | 0                                | 0.0   | 60.4  | 0       | 0.0   | 71.3  | 0    | 0.0   | 52.2  | 0       | 0.0   | 67.4  | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 8.7   | 0       | 0.0   | 11.0  | 0    | 0.0   | 12.8  | 0       | 0.0   | 16.3  | 0.0                               |
| Total                                                                                                               | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 22.0                              |
| Moderate                                                                                                            | 0                                | 0.0   | 1.7   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 16.5                              |
| Middle                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.8                              |
| Upper                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.7                              |
| Unknown                                                                                                             | 0                                | 0.0   | 98.3  | 0       | 0.0   | 99.5  | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                               | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D52A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ventura County MSA |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                            | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 0                        | 0.0   | 1.6   | 0       | 0.0   | 1.0   | 22.2                              |
| Moderate                                                                                                   | 1                        | 20.0  | 9.2   | 252     | 16.1  | 5.4   | 17.1                              |
| Middle                                                                                                     | 1                        | 20.0  | 24.5  | 132     | 8.4   | 20.2  | 20.0                              |
| Upper                                                                                                      | 3                        | 60.0  | 54.0  | 1,183   | 75.5  | 62.7  | 40.8                              |
| Unknown                                                                                                    | 0                        | 0.0   | 10.7  | 0       | 0.0   | 10.7  | 0.0                               |
| Total                                                                                                      | 5                        | 100.0 | 100.0 | 1,567   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                            |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 0                        | 0.0   | 2.8   | 0       | 0.0   | 1.7   | 22.2                              |
| Moderate                                                                                                   | 3                        | 21.4  | 11.1  | 821     | 4.9   | 7.8   | 17.1                              |
| Middle                                                                                                     | 0                        | 0.0   | 22.5  | 0       | 0.0   | 19.9  | 20.0                              |
| Upper                                                                                                      | 10                       | 71.4  | 46.0  | 15,053  | 90.3  | 51.8  | 40.8                              |
| Unknown                                                                                                    | 1                        | 7.1   | 17.6  | 790     | 4.7   | 18.8  | 0.0                               |
| Total                                                                                                      | 14                       | 100.0 | 100.0 | 16,664  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 1                        | 5.9   | 4.0   | 150     | 4.7   | 2.8   | 22.2                              |
| Moderate                                                                                                   | 1                        | 5.9   | 10.5  | 50      | 1.6   | 9.0   | 17.1                              |
| Middle                                                                                                     | 3                        | 17.6  | 21.8  | 360     | 11.3  | 21.2  | 20.0                              |
| Upper                                                                                                      | 12                       | 70.6  | 58.8  | 2,633   | 82.5  | 61.1  | 40.8                              |
| Unknown                                                                                                    | 0                        | 0.0   | 4.8   | 0       | 0.0   | 5.8   | 0.0                               |
| Total                                                                                                      | 17                       | 100.0 | 100.0 | 3,193   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                  |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 1                        | 2.1   | 2.7   | 150     | 0.6   | 1.6   | 22.2                              |
| Moderate                                                                                                   | 5                        | 10.6  | 10.7  | 1,123   | 4.4   | 7.3   | 17.1                              |
| Middle                                                                                                     | 5                        | 10.6  | 22.6  | 553     | 2.1   | 19.8  | 20.0                              |
| Upper                                                                                                      | 35                       | 74.5  | 47.7  | 23,155  | 89.8  | 54.2  | 40.8                              |
| Unknown                                                                                                    | 1                        | 2.1   | 16.3  | 790     | 3.1   | 17.2  | 0.0                               |
| Total                                                                                                      | 47                       | 100.0 | 100.0 | 25,771  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                             |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                    |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                             |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                  |                          |       |       |         |       |       |                                   |

Table D52B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Ventura County MSA |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                            | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 0                        | 0.0   | 5.3   | 0       | 0.0   | 4.5   | 22.2                              |
| Moderate                                                                                                   | 0                        | 0.0   | 9.3   | 0       | 0.0   | 7.5   | 17.1                              |
| Middle                                                                                                     | 1                        | 9.1   | 19.4  | 61      | 1.4   | 15.7  | 20.0                              |
| Upper                                                                                                      | 10                       | 90.9  | 64.8  | 4,286   | 98.6  | 70.2  | 40.8                              |
| Unknown                                                                                                    | 0                        | 0.0   | 1.2   | 0       | 0.0   | 2.0   | 0.0                               |
| Total                                                                                                      | 11                       | 100.0 | 100.0 | 4,347   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 0                        | 0.0   | 4.8   | 0       | 0.0   | 2.7   | 22.2                              |
| Moderate                                                                                                   | 0                        | 0.0   | 10.9  | 0       | 0.0   | 6.5   | 17.1                              |
| Middle                                                                                                     | 0                        | 0.0   | 20.6  | 0       | 0.0   | 15.9  | 20.0                              |
| Upper                                                                                                      | 0                        | 0.0   | 58.9  | 0       | 0.0   | 71.7  | 40.8                              |
| Unknown                                                                                                    | 0                        | 0.0   | 4.8   | 0       | 0.0   | 3.2   | 0.0                               |
| Total                                                                                                      | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 22.2                              |
| Moderate                                                                                                   | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 17.1                              |
| Middle                                                                                                     | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 20.0                              |
| Upper                                                                                                      | 0                        | 0.0   | 1.1   | 0       | 0.0   | 2.3   | 40.8                              |
| Unknown                                                                                                    | 0                        | 0.0   | 98.3  | 0       | 0.0   | 97.1  | 0.0                               |
| Total                                                                                                      | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                             |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                    |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                             |                          |       |       |         |       |       |                                   |

**Table D53**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Ventura County MSA                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 10                               | 52.6  | 45.1  | 2,473   | 48.9  | 23.5  | 6    | 26.1  | 51.6  | 336     | 7.5   | 30.9  | 92.6                     |
| Over \$1 Million                                                                   | 7                                | 36.8  |       | 2,532   | 50.0  |       | 14   | 60.9  |       | 3,905   | 87.6  |       | 7.0                      |
| Revenue Unknown                                                                    | 2                                | 10.5  |       | 57      | 1.1   |       | 3    | 13.0  |       | 219     | 4.9   |       | 0.5                      |
| Total                                                                              | 19                               | 100.0 |       | 5,062   | 100.0 |       | 23   | 100.0 |       | 4,460   | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 9                                | 47.4  | 93.4  | 390     | 7.7   | 41.2  | 13   | 56.5  | 95.9  | 785     | 17.6  | 49.6  |                          |
| \$100,001 - \$250,000                                                              | 4                                | 21.1  | 3.9   | 683     | 13.5  | 18.6  | 5    | 21.7  | 2.4   | 975     | 21.9  | 15.2  |                          |
| \$250,001 - \$1 Million                                                            | 6                                | 31.6  | 2.7   | 3,989   | 78.8  | 40.2  | 5    | 21.7  | 1.6   | 2,700   | 60.5  | 35.2  |                          |
| Total                                                                              | 19                               | 100.0 | 100.0 | 5,062   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 4,460   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 6                                | 60.0  |       | 233     | 9.4   |       | 6    | 100.0 |       | 336     | 100.0 |       |                          |
| \$100,001 - \$250,000                                                              | 2                                | 20.0  |       | 283     | 11.4  |       | 0    | 0.0   |       | 0       | 0.0   |       |                          |
| \$250,001 - \$1 Million                                                            | 2                                | 20.0  |       | 1,957   | 79.1  |       | 0    | 0.0   |       | 0       | 0.0   |       |                          |
| Total                                                                              | 10                               | 100.0 |       | 2,473   | 100.0 |       | 6    | 100.0 |       | 336     | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D54**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Ventura County MSA                                       |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 15                       | 46.9  | 37.2  | 2,046   | 27.2  | 24.1  | 92.5                     |
| Over \$1 Million                                                          | 12                       | 37.5  |       | 5,239   | 69.7  |       | 7.1                      |
| Revenue Unknown                                                           | 5                        | 15.6  |       | 231     | 3.1   |       | 0.4                      |
| Total                                                                     | 32                       | 100.0 |       | 7,516   | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 17                       | 53.1  | 89.5  | 786     | 10.5  | 38.4  |                          |
| \$100,001 - \$250,000                                                     | 6                        | 18.8  | 6.4   | 1,231   | 16.4  | 20.3  |                          |
| \$250,001 - \$1 Million                                                   | 9                        | 28.1  | 4.1   | 5,499   | 73.2  | 41.3  |                          |
| Total                                                                     | 32                       | 100.0 | 100.0 | 7,516   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 11                       | 73.3  |       | 455     | 22.2  |       |                          |
| \$100,001 - \$250,000                                                     | 2                        | 13.3  |       | 369     | 18.0  |       |                          |
| \$250,001 - \$1 Million                                                   | 2                        | 13.3  |       | 1,222   | 59.7  |       |                          |
| Total                                                                     | 15                       | 100.0 |       | 2,046   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

**Table D55**

| 2022 Combined Demographics<br>Assessment Area: Naples MSA                                                                                                                                 |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 8                         | 7.3                   | 5,236                              | 5.3          | 1,381                                              | 26.4         | 21,523                    | 21.9         |
| Moderate                                                                                                                                                                                  | 21                        | 19.3                  | 20,029                             | 20.4         | 2,325                                              | 11.6         | 17,688                    | 18.0         |
| Middle                                                                                                                                                                                    | 44                        | 40.4                  | 39,169                             | 39.9         | 2,069                                              | 5.3          | 19,185                    | 19.6         |
| Upper                                                                                                                                                                                     | 33                        | 30.3                  | 32,351                             | 33.0         | 975                                                | 3.0          | 39,725                    | 40.5         |
| Unknown                                                                                                                                                                                   | 3                         | 2.8                   | 1,336                              | 1.4          | 179                                                | 13.4         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>109</b>                | <b>100.0</b>          | <b>98,121</b>                      | <b>100.0</b> | <b>6,929</b>                                       | <b>7.1</b>   | <b>98,121</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 8,244                     | 2,479                 | 2.3                                | 30.1         | 4,636                                              | 56.2         | 1,129                     | 13.7         |
| Moderate                                                                                                                                                                                  | 35,637                    | 19,187                | 17.4                               | 53.8         | 9,046                                              | 25.4         | 7,404                     | 20.8         |
| Middle                                                                                                                                                                                    | 90,531                    | 44,798                | 40.7                               | 49.5         | 15,939                                             | 17.6         | 29,794                    | 32.9         |
| Upper                                                                                                                                                                                     | 81,352                    | 42,257                | 38.4                               | 51.9         | 7,977                                              | 9.8          | 31,118                    | 38.3         |
| Unknown                                                                                                                                                                                   | 2,584                     | 1,362                 | 1.2                                | 52.7         | 296                                                | 11.5         | 926                       | 35.8         |
| <b>Total AA</b>                                                                                                                                                                           | <b>218,348</b>            | <b>110,083</b>        | <b>100.0</b>                       | <b>50.4</b>  | <b>37,894</b>                                      | <b>17.4</b>  | <b>70,371</b>             | <b>32.2</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 891                       | 2.6                   | 834                                | 2.6          | 50                                                 | 3.3          | 7                         | 1.7          |
| Moderate                                                                                                                                                                                  | 5,257                     | 15.5                  | 5,095                              | 15.9         | 125                                                | 8.2          | 37                        | 8.8          |
| Middle                                                                                                                                                                                    | 14,827                    | 43.6                  | 13,948                             | 43.5         | 700                                                | 46.0         | 179                       | 42.5         |
| Upper                                                                                                                                                                                     | 12,644                    | 37.2                  | 11,808                             | 36.9         | 643                                                | 42.2         | 193                       | 45.8         |
| Unknown                                                                                                                                                                                   | 368                       | 1.1                   | 358                                | 1.1          | 5                                                  | 0.3          | 5                         | 1.2          |
| <b>Total AA</b>                                                                                                                                                                           | <b>33,987</b>             | <b>100.0</b>          | <b>32,043</b>                      | <b>100.0</b> | <b>1,523</b>                                       | <b>100.0</b> | <b>421</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | <b>94.3</b>  |                                                    | <b>4.5</b>   |                           | <b>1.2</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 43                        | 17.5                  | 33                                 | 14.3         | 10                                                 | 62.5         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 43                        | 17.5                  | 42                                 | 18.3         | 1                                                  | 6.3          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 107                       | 43.5                  | 104                                | 45.2         | 3                                                  | 18.8         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 52                        | 21.1                  | 50                                 | 21.7         | 2                                                  | 12.5         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 1                         | 0.4                   | 1                                  | 0.4          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>246</b>                | <b>100.0</b>          | <b>230</b>                         | <b>100.0</b> | <b>16</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | <b>93.5</b>  |                                                    | <b>6.5</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D56**

| 2021 Combined Demographics<br>Assessment Area: Naples MSA                                                                                                                                 |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 6                         | 8.1                   | 4,106                              | 4.7          | 1,627                                              | 39.6         | 18,278                    | 20.8         |
| Moderate                                                                                                                                                                                  | 15                        | 20.3                  | 17,381                             | 19.8         | 3,098                                              | 17.8         | 15,489                    | 17.7         |
| Middle                                                                                                                                                                                    | 26                        | 35.1                  | 35,130                             | 40.1         | 2,147                                              | 6.1          | 16,908                    | 19.3         |
| Upper                                                                                                                                                                                     | 26                        | 35.1                  | 31,048                             | 35.4         | 1,147                                              | 3.7          | 36,990                    | 42.2         |
| Unknown                                                                                                                                                                                   | 1                         | 1.4                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>74</b>                 | <b>100.0</b>          | <b>87,665</b>                      | <b>100.0</b> | <b>8,019</b>                                       | <b>9.1</b>   | <b>87,665</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 7,284                     | 2,124                 | 2.3                                | 29.2         | 3,424                                              | 47.0         | 1,736                     | 23.8         |
| Moderate                                                                                                                                                                                  | 36,919                    | 15,285                | 16.3                               | 41.4         | 10,215                                             | 27.7         | 11,419                    | 30.9         |
| Middle                                                                                                                                                                                    | 76,674                    | 38,746                | 41.3                               | 50.5         | 13,667                                             | 17.8         | 24,261                    | 31.6         |
| Upper                                                                                                                                                                                     | 80,705                    | 37,578                | 40.1                               | 46.6         | 8,849                                              | 11.0         | 34,278                    | 42.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>201,582</b>            | <b>93,733</b>         | <b>100.0</b>                       | <b>46.5</b>  | <b>36,155</b>                                      | <b>17.9</b>  | <b>71,694</b>             | <b>35.6</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1,008                     | 3.0                   | 954                                | 3.0          | 46                                                 | 3.0          | 8                         | 2.2          |
| Moderate                                                                                                                                                                                  | 4,678                     | 13.8                  | 4,540                              | 14.1         | 106                                                | 6.9          | 32                        | 8.9          |
| Middle                                                                                                                                                                                    | 13,520                    | 39.7                  | 12,827                             | 39.9         | 557                                                | 36.4         | 136                       | 37.7         |
| Upper                                                                                                                                                                                     | 14,808                    | 43.5                  | 13,803                             | 43.0         | 820                                                | 53.6         | 185                       | 51.2         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>34,014</b>             | <b>100.0</b>          | <b>32,124</b>                      | <b>100.0</b> | <b>1,529</b>                                       | <b>100.0</b> | <b>361</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | <b>94.4</b>  |                                                    | <b>4.5</b>   |                           | <b>1.1</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 29                        | 11.2                  | 26                                 | 10.6         | 3                                                  | 21.4         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 44                        | 17.0                  | 37                                 | 15.1         | 7                                                  | 50.0         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 103                       | 39.8                  | 100                                | 40.8         | 3                                                  | 21.4         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 83                        | 32.0                  | 82                                 | 33.5         | 1                                                  | 7.1          | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>259</b>                | <b>100.0</b>          | <b>245</b>                         | <b>100.0</b> | <b>14</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | <b>94.6</b>  |                                                    | <b>5.4</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D57**

| 2020 Combined Demographics<br>Assessment Area: Naples MSA                                                                                                                                 |                           |                                    |                          |                  |                                                    |                      |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|--------------------------|------------------|----------------------------------------------------|----------------------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                                  | #                        | %                | #                                                  | %                    | #                         | %         |
| Low                                                                                                                                                                                       | 6                         | 8.1                                | 4,106                    | 4.7              | 1,627                                              | 39.6                 | 18,278                    | 20.8      |
| Moderate                                                                                                                                                                                  | 15                        | 20.3                               | 17,381                   | 19.8             | 3,098                                              | 17.8                 | 15,489                    | 17.7      |
| Middle                                                                                                                                                                                    | 26                        | 35.1                               | 35,130                   | 40.1             | 2,147                                              | 6.1                  | 16,908                    | 19.3      |
| Upper                                                                                                                                                                                     | 26                        | 35.1                               | 31,048                   | 35.4             | 1,147                                              | 3.7                  | 36,990                    | 42.2      |
| Unknown                                                                                                                                                                                   | 1                         | 1.4                                | 0                        | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 74                        | 100.0                              | 87,665                   | 100.0            | 8,019                                              | 9.1                  | 87,665                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract              |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied                     |                          |                  | Rental                                             |                      | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                                  | % by tract               | % by unit        | #                                                  | % by unit            | #                         | % by unit |
| Low                                                                                                                                                                                       | 7,284                     | 2,124                              | 2.3                      | 29.2             | 3,424                                              | 47.0                 | 1,736                     | 23.8      |
| Moderate                                                                                                                                                                                  | 36,919                    | 15,285                             | 16.3                     | 41.4             | 10,215                                             | 27.7                 | 11,419                    | 30.9      |
| Middle                                                                                                                                                                                    | 76,674                    | 38,746                             | 41.3                     | 50.5             | 13,667                                             | 17.8                 | 24,261                    | 31.6      |
| Upper                                                                                                                                                                                     | 80,705                    | 37,578                             | 40.1                     | 46.6             | 8,849                                              | 11.0                 | 34,278                    | 42.5      |
| Unknown                                                                                                                                                                                   | 0                         | 0                                  | 0.0                      | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 201,582                   | 93,733                             | 100.0                    | 46.5             | 36,155                                             | 17.9                 | 71,694                    | 35.6      |
|                                                                                                                                                                                           | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 983                       | 2.9                                | 926                      | 2.9              | 50                                                 | 3.2                  | 7                         | 2.1       |
| Moderate                                                                                                                                                                                  | 4,603                     | 13.7                               | 4,470                    | 14.1             | 106                                                | 6.8                  | 27                        | 8.0       |
| Middle                                                                                                                                                                                    | 13,427                    | 39.9                               | 12,741                   | 40.1             | 565                                                | 36.1                 | 121                       | 35.7      |
| Upper                                                                                                                                                                                     | 14,666                    | 43.5                               | 13,640                   | 42.9             | 842                                                | 53.9                 | 184                       | 54.3      |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                                | 0                        | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 33,679                    | 100.0                              | 31,777                   | 100.0            | 1,563                                              | 100.0                | 339                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                                    |                          | 94.4             |                                                    | 4.6                  |                           | 1.0       |
|                                                                                                                                                                                           | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |                                                    |                      |                           |           |
|                                                                                                                                                                                           |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |                                                    | Revenue Not Reported |                           |           |
|                                                                                                                                                                                           |                           | #                                  | %                        | #                | %                                                  | #                    | %                         |           |
| Low                                                                                                                                                                                       | 26                        | 10.1                               | 23                       | 9.5              | 3                                                  | 20.0                 | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 42                        | 16.3                               | 35                       | 14.5             | 7                                                  | 46.7                 | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 99                        | 38.5                               | 95                       | 39.4             | 3                                                  | 20.0                 | 1                         | 100.0     |
| Upper                                                                                                                                                                                     | 90                        | 35.0                               | 88                       | 36.5             | 2                                                  | 13.3                 | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                                | 0                        | 0.0              | 0                                                  | 0.0                  | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 257                       | 100.0                              | 241                      | 100.0            | 15                                                 | 100.0                | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                                    |                          | 93.8             |                                                    | 5.8                  |                           | 0.4       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |                                                    |                      |                           |           |



Table D58A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Naples MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|-------|
| Geographic<br>Income<br>Level                                                                                   | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |       |
|                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |       |
|                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |       |
|                                                                                                                 | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |       |
| Home Purchase Loans                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |
| Low                                                                                                             | 0                                | 0.0   | 1.6   | 0       | 0.0   | 1.6   | 0    | 0.0   | 1.3   | 0       | 0.0   | 1.2   | 2.3                          |       |
| Moderate                                                                                                        | 4                                | 57.1  | 15.1  | 1,311   | 17.7  | 10.7  | 0    | 0.0   | 19.9  | 0       | 0.0   | 13.4  | 17.4                         |       |
| Middle                                                                                                          | 0                                | 0.0   | 41.7  | 0       | 0.0   | 34.6  | 2    | 40.0  | 46.0  | 2,947   | 41.8  | 39.2  | 40.7                         |       |
| Upper                                                                                                           | 3                                | 42.9  | 41.5  | 6,080   | 82.3  | 53.1  | 3    | 60.0  | 31.7  | 4,100   | 58.2  | 45.0  | 38.4                         |       |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.0   | 0       | 0.0   | 1.2   | 1.2                          |       |
| Total                                                                                                           | 7                                | 100.0 | 100.0 | 7,391   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 7,047   | 100.0 | 100.0 | 100.0                        |       |
| Refinance Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |
| Low                                                                                                             | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.6   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.7   | 2.3                          |       |
| Moderate                                                                                                        | 2                                | 28.6  | 13.8  | 252     | 7.2   | 9.6   | 0    | 0.0   | 19.1  | 0       | 0.0   | 11.1  | 17.4                         |       |
| Middle                                                                                                          | 4                                | 57.1  | 43.6  | 1,458   | 41.5  | 37.6  | 2    | 50.0  | 43.0  | 1,203   | 13.7  | 34.7  | 40.7                         |       |
| Upper                                                                                                           | 1                                | 14.3  | 41.8  | 1,800   | 51.3  | 52.2  | 2    | 50.0  | 35.7  | 7,602   | 86.3  | 52.4  | 38.4                         |       |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.2   | 0       | 0.0   | 1.1   | 1.2                          |       |
| Total                                                                                                           | 7                                | 100.0 | 100.0 | 3,510   | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 8,805   | 100.0 | 100.0 | 100.0                        |       |
| Home Improvement Loans                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |
| Low                                                                                                             | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 2.3                          |       |
| Moderate                                                                                                        | 1                                | 50.0  | 10.5  | 200     | 87.0  | 7.7   | 2    | 66.7  | 15.1  | 556     | 85.9  | 8.9   | 17.4                         |       |
| Middle                                                                                                          | 0                                | 0.0   | 45.4  | 0       | 0.0   | 34.5  | 0    | 0.0   | 44.7  | 0       | 0.0   | 39.9  | 40.7                         |       |
| Upper                                                                                                           | 1                                | 50.0  | 43.5  | 30      | 13.0  | 57.3  | 1    | 33.3  | 38.0  | 91      | 14.1  | 49.8  | 38.4                         |       |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.8   | 0       | 0.0   | 1.3   | 1.2                          |       |
| Total                                                                                                           | 2                                | 100.0 | 100.0 | 230     | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 647     | 100.0 | 100.0 | 100.0                        |       |
| Multifamily Loans                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |       |
| Low                                                                                                             | 0                                | 0.0   | 16.7  | 0       | 0.0   | 5.8   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              | 3.2   |
| Moderate                                                                                                        | 0                                | 0.0   | 50.0  | 0       | 0.0   | 28.5  | 0    | 0.0   | 27.3  | 0       | 0.0   | 21.7  |                              | 10.6  |
| Middle                                                                                                          | 0                                | 0.0   | 5.6   | 0       | 0.0   | 17.0  | 0    | 0.0   | 54.5  | 0       | 0.0   | 68.4  |                              | 42.3  |
| Upper                                                                                                           | 0                                | 0.0   | 27.8  | 0       | 0.0   | 48.6  | 0    | 0.0   | 18.2  | 0       | 0.0   | 9.9   |                              | 43.3  |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              | 0.7   |
| Total                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 |                              | 100.0 |
| Total Home Mortgage Loans                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |       |
| Low                                                                                                             | 0                                | 0.0   | 1.2   | 0       | 0.0   | 1.2   | 0    | 0.0   | 1.1   | 0       | 0.0   | 1.0   |                              | 2.3   |
| Moderate                                                                                                        | 8                                | 38.1  | 14.3  | 1,956   | 15.5  | 10.3  | 2    | 11.8  | 18.5  | 556     | 3.0   | 12.0  |                              | 17.4  |
| Middle                                                                                                          | 5                                | 23.8  | 42.4  | 1,535   | 12.1  | 34.6  | 5    | 29.4  | 44.8  | 4,280   | 23.1  | 37.2  |                              | 40.7  |
| Upper                                                                                                           | 8                                | 38.1  | 42.1  | 9,150   | 72.4  | 53.9  | 10   | 58.8  | 34.5  | 13,692  | 73.9  | 48.6  |                              | 38.4  |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.2   | 0       | 0.0   | 1.2   |                              | 1.2   |
| Total                                                                                                           | 21                               | 100.0 | 100.0 | 12,641  | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 18,528  | 100.0 | 100.0 |                              | 100.0 |
| Source: 2022 FFIEC Census Data                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |       |

Table D58B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Naples MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                   | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                 | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                             | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.8   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.4   | 2.3                          |
| Moderate                                                                                                        | 1                                | 25.0  | 10.4  | 193     | 25.1  | 9.5   | 0    | 0.0   | 11.5  | 0       | 0.0   | 5.8   | 17.4                         |
| Middle                                                                                                          | 1                                | 25.0  | 44.0  | 77      | 10.0  | 35.1  | 1    | 25.0  | 46.0  | 130     | 10.2  | 35.3  | 40.7                         |
| Upper                                                                                                           | 2                                | 50.0  | 45.0  | 500     | 64.9  | 54.7  | 3    | 75.0  | 39.9  | 1,149   | 89.8  | 57.0  | 38.4                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.0   | 0       | 0.0   | 1.4   | 1.2                          |
| Tract-Unk                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                           | 4                                | 100.0 | 100.0 | 770     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 1,279   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                             | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.7   | 2.3                          |
| Moderate                                                                                                        | 0                                | 0.0   | 8.4   | 0       | 0.0   | 3.2   | 0    | 0.0   | 7.5   | 0       | 0.0   | 2.4   | 17.4                         |
| Middle                                                                                                          | 0                                | 0.0   | 29.8  | 0       | 0.0   | 14.8  | 0    | 0.0   | 35.3  | 0       | 0.0   | 17.7  | 40.7                         |
| Upper                                                                                                           | 1                                | 100.0 | 61.4  | 740     | 100.0 | 81.7  | 1    | 100.0 | 55.3  | 750     | 100.0 | 78.1  | 38.4                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.2   | 0       | 0.0   | 1.1   | 1.2                          |
| Tract-Unk                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                           | 1                                | 100.0 | 100.0 | 740     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 750     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                             | 0                                | 0.0   | 2.5   | 0       | 0.0   | 1.4   | 0    | 0.0   | 4.3   | 0       | 0.0   | 2.0   | 2.3                          |
| Moderate                                                                                                        | 0                                | 0.0   | 22.2  | 0       | 0.0   | 17.6  | 0    | 0.0   | 34.0  | 0       | 0.0   | 22.4  | 17.4                         |
| Middle                                                                                                          | 0                                | 0.0   | 37.0  | 0       | 0.0   | 31.2  | 0    | 0.0   | 42.6  | 0       | 0.0   | 41.7  | 40.7                         |
| Upper                                                                                                           | 0                                | 0.0   | 38.3  | 0       | 0.0   | 49.9  | 0    | 0.0   | 14.9  | 0       | 0.0   | 30.6  | 38.4                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 4.3   | 0       | 0.0   | 3.3   | 1.2                          |
| Tract-Unk                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D59A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Naples MSA                                             |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.2   | 0       | 0.0   | 1.2   | 2.3                          |
| Moderate                                                                | 3                        | 30.0  | 15.2  | 674     | 13.6  | 10.9  | 16.3                         |
| Middle                                                                  | 6                        | 60.0  | 41.4  | 3,962   | 79.9  | 34.3  | 41.3                         |
| Upper                                                                   | 1                        | 10.0  | 42.2  | 323     | 6.5   | 53.5  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 10                       | 100.0 | 100.0 | 4,959   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.5   | 2.3                          |
| Moderate                                                                | 4                        | 66.7  | 12.1  | 1,052   | 55.2  | 8.7   | 16.3                         |
| Middle                                                                  | 0                        | 0.0   | 44.4  | 0       | 0.0   | 37.9  | 41.3                         |
| Upper                                                                   | 2                        | 33.3  | 42.8  | 855     | 44.8  | 52.9  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 6                        | 100.0 | 100.0 | 1,907   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.2   | 2.3                          |
| Moderate                                                                | 0                        | 0.0   | 12.0  | 0       | 0.0   | 10.8  | 16.3                         |
| Middle                                                                  | 0                        | 0.0   | 49.0  | 0       | 0.0   | 40.0  | 41.3                         |
| Upper                                                                   | 2                        | 100.0 | 38.5  | 600     | 100.0 | 49.1  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 600     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                | 0                        | 0.0   | 40.0  | 0       | 0.0   | 24.8  | 16.3                         |
| Middle                                                                  | 0                        | 0.0   | 50.0  | 0       | 0.0   | 75.1  | 33.6                         |
| Upper                                                                   | 1                        | 100.0 | 10.0  | 14,000  | 100.0 | 0.0   | 48.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 1                        | 100.0 | 100.0 | 14,000  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 1.0   | 0       | 0.0   | 0.9   |                              |
| Moderate                                                                | 8                        | 30.8  | 13.8  | 2,036   | 6.5   | 10.2  | 16.3                         |
| Middle                                                                  | 7                        | 26.9  | 42.6  | 4,062   | 12.9  | 35.8  | 41.3                         |
| Upper                                                                   | 11                       | 42.3  | 42.6  | 25,292  | 80.6  | 53.1  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 26                       | 100.0 | 100.0 | 31,390  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D59B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Naples MSA                                             |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 2.3                          |
| Moderate                                                                | 0                        | 0.0   | 11.9  | 0       | 0.0   | 8.6   | 16.3                         |
| Middle                                                                  | 1                        | 25.0  | 36.6  | 100     | 7.7   | 23.2  | 41.3                         |
| Upper                                                                   | 3                        | 75.0  | 51.4  | 1,194   | 92.3  | 68.2  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 4                        | 100.0 | 100.0 | 1,294   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.6   | 0       | 0.0   | 1.7   | 2.3                          |
| Moderate                                                                | 1                        | 33.3  | 11.3  | 310     | 3.6   | 5.4   | 16.3                         |
| Middle                                                                  | 0                        | 0.0   | 31.9  | 0       | 0.0   | 13.0  | 41.3                         |
| Upper                                                                   | 2                        | 66.7  | 55.3  | 8,320   | 96.4  | 79.9  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 3                        | 100.0 | 100.0 | 8,630   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.7   | 0       | 0.0   | 0.8   | 2.3                          |
| Moderate                                                                | 0                        | 0.0   | 27.6  | 0       | 0.0   | 21.7  | 16.3                         |
| Middle                                                                  | 0                        | 0.0   | 36.2  | 0       | 0.0   | 28.8  | 41.3                         |
| Upper                                                                   | 0                        | 0.0   | 34.5  | 0       | 0.0   | 48.7  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table D60**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Naples MSA                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                   | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                               | 1                                | 10.0  | 3.0   | 29      | 1.4   | 3.5   | 0    | 0.0   | 2.2   | 0       | 0.0   | 2.8   | 2.6                      |
| Moderate                                                                          | 1                                | 10.0  | 12.7  | 10      | 0.5   | 7.8   | 1    | 20.0  | 15.7  | 10      | 1.2   | 11.9  | 15.5                     |
| Middle                                                                            | 4                                | 40.0  | 39.7  | 728     | 34.1  | 35.3  | 3    | 60.0  | 45.9  | 397     | 49.2  | 43.8  | 43.6                     |
| Upper                                                                             | 4                                | 40.0  | 44.3  | 1,370   | 64.1  | 53.2  | 1    | 20.0  | 35.1  | 400     | 49.6  | 40.7  | 37.2                     |
| Unknown                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.7   | 1.1                      |
| Total                                                                             | 10                               | 100.0 | 100.0 | 2,137   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 807     | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D61**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Naples MSA |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                     | 1                        | 10.0  | 2.8   | 34      | 3.2   | 3.6   | 2.9                      |
| Moderate                                                                                                | 0                        | 0.0   | 11.0  | 0       | 0.0   | 6.5   | 13.7                     |
| Middle                                                                                                  | 5                        | 50.0  | 40.1  | 381     | 36.3  | 36.9  | 39.9                     |
| Upper                                                                                                   | 4                        | 40.0  | 45.8  | 634     | 60.4  | 52.7  | 43.5                     |
| Unknown                                                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                   | 10                       | 100.0 | 100.0 | 1,049   | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D62A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Naples MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 2.2   | 0       | 0.0   | 1.2   | 0    | 0.0   | 2.2   | 0       | 0.0   | 1.1   | 21.9                              |
| Moderate                                                                                                    | 1                                | 14.3  | 11.0  | 192     | 2.6   | 6.0   | 0    | 0.0   | 9.1   | 0       | 0.0   | 4.5   | 18.0                              |
| Middle                                                                                                      | 0                                | 0.0   | 16.4  | 0       | 0.0   | 10.7  | 1    | 20.0  | 17.8  | 80      | 1.1   | 11.2  | 19.6                              |
| Upper                                                                                                       | 5                                | 71.4  | 58.2  | 1,999   | 27.0  | 68.8  | 4    | 80.0  | 56.2  | 6,967   | 98.9  | 67.7  | 40.5                              |
| Unknown                                                                                                     | 1                                | 14.3  | 12.1  | 5,200   | 70.4  | 13.1  | 0    | 0.0   | 14.7  | 0       | 0.0   | 15.6  | 0.0                               |
| Total                                                                                                       | 7                                | 100.0 | 100.0 | 7,391   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 7,047   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 4.0   | 0       | 0.0   | 2.1   | 1    | 25.0  | 8.2   | 200     | 2.3   | 4.4   | 21.9                              |
| Moderate                                                                                                    | 1                                | 14.3  | 14.3  | 139     | 4.0   | 8.4   | 0    | 0.0   | 17.1  | 0       | 0.0   | 9.1   | 18.0                              |
| Middle                                                                                                      | 2                                | 28.6  | 19.5  | 414     | 11.8  | 14.0  | 0    | 0.0   | 21.1  | 0       | 0.0   | 14.1  | 19.6                              |
| Upper                                                                                                       | 4                                | 57.1  | 47.0  | 2,957   | 84.2  | 60.1  | 2    | 50.0  | 40.8  | 1,203   | 13.7  | 56.2  | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 15.3  | 0       | 0.0   | 15.4  | 1    | 25.0  | 12.8  | 7,402   | 84.1  | 16.2  | 0.0                               |
| Total                                                                                                       | 7                                | 100.0 | 100.0 | 3,510   | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 8,805   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 5.0   | 0       | 0.0   | 2.4   | 0    | 0.0   | 3.9   | 0       | 0.0   | 2.0   | 21.9                              |
| Moderate                                                                                                    | 0                                | 0.0   | 13.3  | 0       | 0.0   | 7.1   | 0    | 0.0   | 15.6  | 0       | 0.0   | 7.6   | 18.0                              |
| Middle                                                                                                      | 1                                | 50.0  | 18.6  | 30      | 13.0  | 12.8  | 0    | 0.0   | 17.6  | 0       | 0.0   | 9.5   | 19.6                              |
| Upper                                                                                                       | 1                                | 50.0  | 60.2  | 200     | 87.0  | 73.7  | 3    | 100.0 | 59.4  | 647     | 100.0 | 77.8  | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 2.9   | 0       | 0.0   | 3.9   | 0    | 0.0   | 3.5   | 0       | 0.0   | 3.1   | 0.0                               |
| Total                                                                                                       | 2                                | 100.0 | 100.0 | 230     | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 647     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 3.1   | 0       | 0.0   | 1.6   | 1    | 5.9   | 4.2   | 200     | 1.1   | 2.0   | 21.9                              |
| Moderate                                                                                                    | 2                                | 9.5   | 12.4  | 331     | 2.6   | 6.7   | 0    | 0.0   | 12.0  | 0       | 0.0   | 5.6   | 18.0                              |
| Middle                                                                                                      | 3                                | 14.3  | 17.6  | 444     | 3.5   | 11.6  | 1    | 5.9   | 18.6  | 80      | 0.4   | 11.3  | 19.6                              |
| Upper                                                                                                       | 15                               | 71.4  | 53.6  | 6,666   | 52.7  | 66.2  | 14   | 82.4  | 52.4  | 10,846  | 58.5  | 65.6  | 40.5                              |
| Unknown                                                                                                     | 1                                | 4.8   | 13.2  | 5,200   | 41.1  | 13.9  | 1    | 5.9   | 12.9  | 7,402   | 40.0  | 15.5  | 0.0                               |
| Total                                                                                                       | 21                               | 100.0 | 100.0 | 12,641  | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 18,528  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D62B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Naples MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 4.0   | 0       | 0.0   | 1.7   | 0    | 0.0   | 6.3   | 0       | 0.0   | 3.8   | 21.9                              |
| Moderate                                                                                                    | 0                                | 0.0   | 15.0  | 0       | 0.0   | 6.5   | 0    | 0.0   | 13.7  | 0       | 0.0   | 6.4   | 18.0                              |
| Middle                                                                                                      | 0                                | 0.0   | 18.5  | 0       | 0.0   | 12.3  | 0    | 0.0   | 20.5  | 0       | 0.0   | 10.7  | 19.6                              |
| Upper                                                                                                       | 4                                | 100.0 | 59.2  | 770     | 100.0 | 75.9  | 4    | 100.0 | 54.2  | 1,279   | 100.0 | 74.5  | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 3.3   | 0       | 0.0   | 3.6   | 0    | 0.0   | 5.3   | 0       | 0.0   | 4.5   | 0.0                               |
| Total                                                                                                       | 4                                | 100.0 | 100.0 | 770     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 1,279   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 4.7   | 0       | 0.0   | 1.3   | 0    | 0.0   | 4.4   | 0       | 0.0   | 1.1   | 21.9                              |
| Moderate                                                                                                    | 0                                | 0.0   | 7.5   | 0       | 0.0   | 1.5   | 0    | 0.0   | 11.2  | 0       | 0.0   | 2.5   | 18.0                              |
| Middle                                                                                                      | 0                                | 0.0   | 7.7   | 0       | 0.0   | 2.0   | 0    | 0.0   | 12.9  | 0       | 0.0   | 3.5   | 19.6                              |
| Upper                                                                                                       | 1                                | 100.0 | 72.0  | 740     | 100.0 | 83.0  | 1    | 100.0 | 61.4  | 750     | 100.0 | 72.4  | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 8.1   | 0       | 0.0   | 12.3  | 0    | 0.0   | 10.1  | 0       | 0.0   | 20.5  | 0.0                               |
| Total                                                                                                       | 1                                | 100.0 | 100.0 | 740     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 750     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 3.7   | 0       | 0.0   | 1.1   | 0    | 0.0   | 8.5   | 0       | 0.0   | 4.5   | 21.9                              |
| Moderate                                                                                                    | 0                                | 0.0   | 1.2   | 0       | 0.0   | 1.4   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.0                              |
| Middle                                                                                                      | 0                                | 0.0   | 2.5   | 0       | 0.0   | 3.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.6                              |
| Upper                                                                                                       | 0                                | 0.0   | 1.2   | 0       | 0.0   | 1.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 91.4  | 0       | 0.0   | 92.4  | 0    | 0.0   | 91.5  | 0       | 0.0   | 95.5  | 0.0                               |
| Total                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D63A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Naples MSA |                          |       |       |         |       |       |                                   |
|----------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                    | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                    | #                        | ##    | ##    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 2.8   | 0       | 0.0   | 1.3   | 20.8                              |
| Moderate                                                                                           | 6                        | 60.0  | 15.7  | 1,435   | 28.9  | 9.4   | 17.7                              |
| Middle                                                                                             | 1                        | 10.0  | 18.0  | 289     | 5.8   | 12.5  | 19.3                              |
| Upper                                                                                              | 3                        | 30.0  | 55.7  | 3,235   | 65.2  | 68.3  | 42.2                              |
| Unknown                                                                                            | 0                        | 0.0   | 7.7   | 0       | 0.0   | 8.4   | 0.0                               |
| Total                                                                                              | 10                       | 100.0 | 100.0 | 4,959   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 3.3   | 0       | 0.0   | 1.5   | 20.8                              |
| Moderate                                                                                           | 0                        | 0.0   | 11.4  | 0       | 0.0   | 6.7   | 17.7                              |
| Middle                                                                                             | 2                        | 33.3  | 17.7  | 600     | 31.5  | 12.6  | 19.3                              |
| Upper                                                                                              | 3                        | 50.0  | 50.6  | 1,125   | 59.0  | 62.5  | 42.2                              |
| Unknown                                                                                            | 1                        | 16.7  | 16.9  | 182     | 9.5   | 16.8  | 0.0                               |
| Total                                                                                              | 6                        | 100.0 | 100.0 | 1,907   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                             |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 6.8   | 0       | 0.0   | 3.2   | 20.8                              |
| Moderate                                                                                           | 0                        | 0.0   | 13.0  | 0       | 0.0   | 6.9   | 17.7                              |
| Middle                                                                                             | 0                        | 0.0   | 21.2  | 0       | 0.0   | 14.3  | 19.3                              |
| Upper                                                                                              | 2                        | 100.0 | 56.1  | 600     | 100.0 | 72.2  | 42.2                              |
| Unknown                                                                                            | 0                        | 0.0   | 3.0   | 0       | 0.0   | 3.4   | 0.0                               |
| Total                                                                                              | 2                        | 100.0 | 100.0 | 600     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 1                        | 4.0   | 3.2   | 100     | 0.6   | 1.5   | 20.8                              |
| Moderate                                                                                           | 6                        | 24.0  | 13.5  | 1,435   | 8.3   | 8.0   | 17.7                              |
| Middle                                                                                             | 3                        | 12.0  | 17.6  | 889     | 5.1   | 12.2  | 19.3                              |
| Upper                                                                                              | 13                       | 52.0  | 52.8  | 9,344   | 53.7  | 65.5  | 42.2                              |
| Unknown                                                                                            | 2                        | 8.0   | 12.9  | 5,622   | 32.3  | 12.8  | 0.0                               |
| Total                                                                                              | 25                       | 100.0 | 100.0 | 17,390  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                     |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                            |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                     |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                          |                          |       |       |         |       |       |                                   |



Table D63B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Naples MSA                                         |                          |       |       |         |       |       |                                   |
| Borrower<br>Income Level                                            | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                     | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                       |                          |       |       |         |       |       |                                   |
| Low                                                                 | 1                        | 25.0  | 5.6   | 100     | 7.7   | 4.4   | 20.8                              |
| Moderate                                                            | 0                        | 0.0   | 13.3  | 0       | 0.0   | 6.6   | 17.7                              |
| Middle                                                              | 0                        | 0.0   | 18.3  | 0       | 0.0   | 8.9   | 19.3                              |
| Upper                                                               | 3                        | 75.0  | 60.9  | 1,194   | 92.3  | 78.5  | 42.2                              |
| Unknown                                                             | 0                        | 0.0   | 1.9   | 0       | 0.0   | 1.5   | 0.0                               |
| Total                                                               | 4                        | 100.0 | 100.0 | 1,294   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                         |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 5.0   | 0       | 0.0   | 1.6   | 20.8                              |
| Moderate                                                            | 0                        | 0.0   | 10.9  | 0       | 0.0   | 3.0   | 17.7                              |
| Middle                                                              | 0                        | 0.0   | 12.8  | 0       | 0.0   | 4.5   | 19.3                              |
| Upper                                                               | 2                        | 66.7  | 62.5  | 3,190   | 37.0  | 74.7  | 42.2                              |
| Unknown                                                             | 1                        | 33.3  | 8.8   | 5,440   | 63.0  | 16.2  | 0.0                               |
| Total                                                               | 3                        | 100.0 | 100.0 | 8,630   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                              |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 3.0   | 0       | 0.0   | 1.7   | 20.8                              |
| Moderate                                                            | 0                        | 0.0   | 3.3   | 0       | 0.0   | 2.9   | 17.7                              |
| Middle                                                              | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.3                              |
| Upper                                                               | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 42.2                              |
| Unknown                                                             | 0                        | 0.0   | 93.1  | 0       | 0.0   | 94.7  | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.      |                          |       |       |         |       |       |                                   |

**Table D64**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|
| Assessment Area: Naples MSA                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |
|                                                                                    | Bank                             |       |       | Agg     |       |       | Bank |       |       | Agg     |       |       |
|                                                                                    | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |
| \$1 Million or Less                                                                | 4                                | 40.0  | 46.9  | 67      | 3.1   | 30.3  | 2    | 40.0  | 51.1  | 57      | 7.1   | 35.6  |
| Over \$1 Million                                                                   | 0                                | 0.0   |       | 0       | 0.0   |       | 2    | 40.0  |       | 350     | 43.4  |       |
| Revenue Unknown                                                                    | 6                                | 60.0  |       | 2,070   | 96.9  |       | 1    | 20.0  |       | 400     | 49.6  |       |
| Total                                                                              | 10                               | 100.0 |       | 2,137   | 100.0 |       | 5    | 100.0 |       | 807     | 100.0 |       |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |
| \$100,000 or Less                                                                  | 6                                | 60.0  | 93.8  | 166     | 7.8   | 41.5  | 3    | 60.0  | 95.7  | 157     | 19.5  | 51.8  |
| \$100,001 - \$250,000                                                              | 0                                | 0.0   | 3.6   | 0       | 0.0   | 17.1  | 1    | 20.0  | 2.6   | 250     | 31.0  | 15.1  |
| \$250,001 - \$1 Million                                                            | 4                                | 40.0  | 2.7   | 1,971   | 92.2  | 41.4  | 1    | 20.0  | 1.8   | 400     | 49.6  | 33.1  |
| Total                                                                              | 10                               | 100.0 | 100.0 | 2,137   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 807     | 100.0 | 100.0 |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |
| \$100,000 or Less                                                                  | 4                                | 100.0 |       | 67      | 100.0 |       | 2    | 100.0 |       | 57      | 100.0 |       |
| \$100,001 - \$250,000                                                              | 0                                | 0.0   |       | 0       | 0.0   |       | 0    | 0.0   |       | 0       | 0.0   |       |
| \$250,001 - \$1 Million                                                            | 0                                | 0.0   |       | 0       | 0.0   |       | 0    | 0.0   |       | 0       | 0.0   |       |
| Total                                                                              | 4                                | 100.0 |       | 67      | 100.0 |       | 2    | 100.0 |       | 57      | 100.0 |       |

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table D65**

Table 200

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Naples MSA                                               |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 6                        | 60.0  | 39.8  | 296     | 28.2  | 28.6  | 94.4                     |
| Over \$1 Million                                                          | 2                        | 20.0  |       | 319     | 30.4  |       | 4.6                      |
| Revenue Unknown                                                           | 2                        | 20.0  |       | 434     | 41.4  |       | 1.0                      |
| Total                                                                     | 10                       | 100.0 |       | 1,049   | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 7                        | 70.0  | 90.1  | 283     | 27.0  | 37.8  |                          |
| \$100,001 - \$250,000                                                     | 2                        | 20.0  | 5.8   | 366     | 34.9  | 19.8  |                          |
| \$250,001 - \$1 Million                                                   | 1                        | 10.0  | 4.1   | 400     | 38.1  | 42.4  |                          |
| Total                                                                     | 10                       | 100.0 | 100.0 | 1,049   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 5                        | 83.3  |       | 180     | 60.8  |       |                          |
| \$100,001 - \$250,000                                                     | 1                        | 16.7  |       | 116     | 39.2  |       |                          |
| \$250,001 - \$1 Million                                                   | 0                        | 0.0   |       | 0       | 0.0   |       |                          |
| Total                                                                     | 6                        | 100.0 |       | 296     | 100.0 |       |                          |

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table D66**

| 2022 Combined Demographics<br>Assessment Area: Battle Creek MSA                                                         |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 3                         | 7.5                   | 1,757                              | 5.3          | 727                                                | 41.4         | 7,285                     | 21.9         |
| Moderate                                                                                                                | 13                        | 32.5                  | 8,250                              | 24.8         | 1,711                                              | 20.7         | 5,731                     | 17.2         |
| Middle                                                                                                                  | 15                        | 37.5                  | 13,123                             | 39.4         | 983                                                | 7.5          | 6,582                     | 19.8         |
| Upper                                                                                                                   | 9                         | 22.5                  | 10,184                             | 30.6         | 470                                                | 4.6          | 13,716                    | 41.2         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>40</b>                 | <b>100.0</b>          | <b>33,314</b>                      | <b>100.0</b> | <b>3,891</b>                                       | <b>11.7</b>  | <b>33,314</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 3,580                     | 1,462                 | 3.9                                | 40.8         | 1,525                                              | 42.6         | 593                       | 16.6         |
| Moderate                                                                                                                | 18,404                    | 8,093                 | 21.5                               | 44.0         | 7,658                                              | 41.6         | 2,653                     | 14.4         |
| Middle                                                                                                                  | 23,662                    | 15,678                | 41.7                               | 66.3         | 5,526                                              | 23.4         | 2,458                     | 10.4         |
| Upper                                                                                                                   | 15,243                    | 12,403                | 33.0                               | 81.4         | 1,779                                              | 11.7         | 1,061                     | 7.0          |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>60,889</b>             | <b>37,636</b>         | <b>100.0</b>                       | <b>61.8</b>  | <b>16,488</b>                                      | <b>27.1</b>  | <b>6,765</b>              | <b>11.1</b>  |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 243                       | 5.6                   | 214                                | 5.6          | 27                                                 | 6.7          | 2                         | 3.9          |
| Moderate                                                                                                                | 1,320                     | 30.7                  | 1,135                              | 29.5         | 174                                                | 42.9         | 11                        | 21.6         |
| Middle                                                                                                                  | 1,662                     | 38.6                  | 1,498                              | 38.9         | 138                                                | 34.0         | 26                        | 51.0         |
| Upper                                                                                                                   | 1,081                     | 25.1                  | 1,002                              | 26.0         | 67                                                 | 16.5         | 12                        | 23.5         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>4,306</b>              | <b>100.0</b>          | <b>3,849</b>                       | <b>100.0</b> | <b>406</b>                                         | <b>100.0</b> | <b>51</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 89.4         |                                                    | 9.4          |                           | 1.2          |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 2                         | 1.2                   | 2                                  | 1.3          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 22                        | 13.5                  | 22                                 | 14.1         | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                  | 86                        | 52.8                  | 83                                 | 53.2         | 3                                                  | 50.0         | 0                         | 0.0          |
| Upper                                                                                                                   | 53                        | 32.5                  | 49                                 | 31.4         | 3                                                  | 50.0         | 1                         | 100.0        |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>163</b>                | <b>100.0</b>          | <b>156</b>                         | <b>100.0</b> | <b>6</b>                                           | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 95.7         |                                                    | 3.7          |                           | 0.6          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D67**

| 2021 Combined Demographics<br>Assessment Area: Battle Creek MSA                                                                                                                           |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 4                         | 10.3                  | 2,135                              | 6.3       | 908                                                | 42.5      | 7,285                     | 21.7      |
| Moderate                                                                                                                                                                                  | 12                        | 30.8                  | 7,832                              | 23.3      | 1,835                                              | 23.4      | 5,985                     | 17.8      |
| Middle                                                                                                                                                                                    | 15                        | 38.5                  | 13,788                             | 41.0      | 1,243                                              | 9.0       | 6,591                     | 19.6      |
| Upper                                                                                                                                                                                     | 8                         | 20.5                  | 9,870                              | 29.4      | 518                                                | 5.2       | 13,764                    | 40.9      |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 39                        | 100.0                 | 33,625                             | 100.0     | 4,504                                              | 13.4      | 33,625                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 4,608                     | 1,907                 | 5.2                                | 41.4      | 1,689                                              | 36.7      | 1,012                     | 22.0      |
| Moderate                                                                                                                                                                                  | 16,795                    | 7,716                 | 21.1                               | 45.9      | 6,041                                              | 36.0      | 3,038                     | 18.1      |
| Middle                                                                                                                                                                                    | 23,487                    | 15,641                | 42.7                               | 66.6      | 5,338                                              | 22.7      | 2,508                     | 10.7      |
| Upper                                                                                                                                                                                     | 15,826                    | 11,376                | 31.0                               | 71.9      | 3,142                                              | 19.9      | 1,308                     | 8.3       |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 60,716                    | 36,640                | 100.0                              | 60.3      | 16,210                                             | 26.7      | 7,866                     | 13.0      |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 361                       | 8.3                   | 314                                | 8.1       | 44                                                 | 10.5      | 3                         | 6.5       |
| Moderate                                                                                                                                                                                  | 1,184                     | 27.1                  | 1,009                              | 25.9      | 166                                                | 39.4      | 9                         | 19.6      |
| Middle                                                                                                                                                                                    | 1,485                     | 34.0                  | 1,351                              | 34.6      | 110                                                | 26.1      | 24                        | 52.2      |
| Upper                                                                                                                                                                                     | 1,337                     | 30.6                  | 1,226                              | 31.4      | 101                                                | 24.0      | 10                        | 21.7      |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 4,367                     | 100.0                 | 3,900                              | 100.0     | 421                                                | 100.0     | 46                        | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 89.3      |                                                    | 9.6       |                           | 1.1       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 2                         | 1.2                   | 2                                  | 1.3       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 5                         | 3.0                   | 5                                  | 3.2       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 127                       | 77.0                  | 121                                | 76.6      | 5                                                  | 83.3      | 1                         | 100.0     |
| Upper                                                                                                                                                                                     | 31                        | 18.8                  | 30                                 | 19.0      | 1                                                  | 16.7      | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 165                       | 100.0                 | 158                                | 100.0     | 6                                                  | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.8      |                                                    | 3.6       |                           | 0.6       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

**Table D68**

| 2020 Combined Demographics<br>Assessment Area: Battle Creek MSA                                                                                                                           |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 4                         | 10.3                  | 2,135                              | 6.3          | 908                                                | 42.5         | 7,285                     | 21.7         |
| Moderate                                                                                                                                                                                  | 12                        | 30.8                  | 7,832                              | 23.3         | 1,835                                              | 23.4         | 5,985                     | 17.8         |
| Middle                                                                                                                                                                                    | 15                        | 38.5                  | 13,788                             | 41.0         | 1,243                                              | 9.0          | 6,591                     | 19.6         |
| Upper                                                                                                                                                                                     | 8                         | 20.5                  | 9,870                              | 29.4         | 518                                                | 5.2          | 13,764                    | 40.9         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>39</b>                 | <b>100.0</b>          | <b>33,625</b>                      | <b>100.0</b> | <b>4,504</b>                                       | <b>13.4</b>  | <b>33,625</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              |                                                    | Rental       |                           | Vacant       |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 4,608                     | 1,907                 | 5.2                                | 41.4         | 1,689                                              | 36.7         | 1,012                     | 22.0         |
| Moderate                                                                                                                                                                                  | 16,795                    | 7,716                 | 21.1                               | 45.9         | 6,041                                              | 36.0         | 3,038                     | 18.1         |
| Middle                                                                                                                                                                                    | 23,487                    | 15,641                | 42.7                               | 66.6         | 5,338                                              | 22.7         | 2,508                     | 10.7         |
| Upper                                                                                                                                                                                     | 15,826                    | 11,376                | 31.0                               | 71.9         | 3,142                                              | 19.9         | 1,308                     | 8.3          |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>60,716</b>             | <b>36,640</b>         | <b>100.0</b>                       | <b>60.3</b>  | <b>16,210</b>                                      | <b>26.7</b>  | <b>7,866</b>              | <b>13.0</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 369                       | 8.3                   | 317                                | 8.0          | 49                                                 | 11.2         | 3                         | 6.8          |
| Moderate                                                                                                                                                                                  | 1,167                     | 26.2                  | 995                                | 25.0         | 163                                                | 37.4         | 9                         | 20.5         |
| Middle                                                                                                                                                                                    | 1,544                     | 34.6                  | 1,409                              | 35.4         | 113                                                | 25.9         | 22                        | 50.0         |
| Upper                                                                                                                                                                                     | 1,378                     | 30.9                  | 1,257                              | 31.6         | 111                                                | 25.5         | 10                        | 22.7         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>4,458</b>              | <b>100.0</b>          | <b>3,978</b>                       | <b>100.0</b> | <b>436</b>                                         | <b>100.0</b> | <b>44</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 89.2         |                                                    | 9.8          |                           | 1.0          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 2                         | 1.2                   | 2                                  | 1.2          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 6                         | 3.6                   | 6                                  | 3.7          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 128                       | 75.7                  | 121                                | 75.2         | 6                                                  | 85.7         | 1                         | 100.0        |
| Upper                                                                                                                                                                                     | 33                        | 19.5                  | 32                                 | 19.9         | 1                                                  | 14.3         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>169</b>                | <b>100.0</b>          | <b>161</b>                         | <b>100.0</b> | <b>7</b>                                           | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 95.3         |                                                    | 4.1          |                           | 0.6          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D69A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Battle Creek MSA                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.6   | 0       | 0.0   | 1.8   | 0    | 0.0   | 5.9   | 0       | 0.0   | 3.8   | 3.9                          |
| Moderate                                                                         | 2                                | 33.3  | 25.0  | 313     | 38.4  | 16.1  | 1    | 100.0 | 24.5  | 47      | 100.0 | 17.1  | 21.5                         |
| Middle                                                                           | 3                                | 50.0  | 39.6  | 338     | 41.4  | 42.3  | 0    | 0.0   | 40.5  | 0       | 0.0   | 43.2  | 41.7                         |
| Upper                                                                            | 1                                | 16.7  | 31.7  | 165     | 20.2  | 39.9  | 0    | 0.0   | 29.1  | 0       | 0.0   | 35.9  | 33.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 6                                | 100.0 | 100.0 | 816     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 47      | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.7   | 0       | 0.0   | 0.7   | 1    | 4.3   | 2.2   | 48      | 1.5   | 1.7   | 3.9                          |
| Moderate                                                                         | 3                                | 16.7  | 14.0  | 206     | 8.3   | 8.8   | 4    | 17.4  | 18.4  | 225     | 6.8   | 12.6  | 21.5                         |
| Middle                                                                           | 5                                | 27.8  | 44.3  | 454     | 18.3  | 44.0  | 10   | 43.5  | 44.0  | 1,099   | 33.4  | 43.1  | 41.7                         |
| Upper                                                                            | 10                               | 55.6  | 40.0  | 1,815   | 73.3  | 46.6  | 8    | 34.8  | 35.3  | 1,915   | 58.3  | 42.6  | 33.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 18                               | 100.0 | 100.0 | 2,475   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 3,287   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.0   | 0       | 0.0   | 1.1   | 0    | 0.0   | 2.4   | 0       | 0.0   | 2.3   | 3.9                          |
| Moderate                                                                         | 3                                | 33.3  | 15.7  | 150     | 17.5  | 11.3  | 3    | 33.3  | 24.8  | 104     | 18.8  | 18.0  | 21.5                         |
| Middle                                                                           | 2                                | 22.2  | 44.2  | 250     | 29.1  | 42.3  | 3    | 33.3  | 40.1  | 199     | 36.0  | 41.3  | 41.7                         |
| Upper                                                                            | 4                                | 44.4  | 38.2  | 458     | 53.4  | 45.3  | 3    | 33.3  | 32.7  | 250     | 45.2  | 38.4  | 33.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 9                                | 100.0 | 100.0 | 858     | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 553     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 1                                | 100.0 | 0.0   | 143     | 100.0 | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 9.0                          |
| Moderate                                                                         | 0                                | 0.0   | 55.6  | 0       | 0.0   | 28.1  | 0    | 0.0   | 36.8  | 0       | 0.0   | 24.3  | 49.4                         |
| Middle                                                                           | 0                                | 0.0   | 22.2  | 0       | 0.0   | 30.4  | 1    | 100.0 | 42.1  | 2,000   | 100.0 | 43.6  | 35.1                         |
| Upper                                                                            | 0                                | 0.0   | 22.2  | 0       | 0.0   | 41.5  | 0    | 0.0   | 21.1  | 0       | 0.0   | 32.2  | 6.6                          |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 1                                | 100.0 | 100.0 | 143     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 2,000   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 2                                | 4.7   | 2.5   | 153     | 3.1   | 1.1   | 1    | 2.4   | 4.2   | 48      | 0.7   | 2.7   | 3.9                          |
| Moderate                                                                         | 12                               | 27.9  | 19.1  | 852     | 17.2  | 13.6  | 9    | 21.4  | 22.3  | 418     | 6.5   | 16.3  | 21.5                         |
| Middle                                                                           | 12                               | 27.9  | 42.1  | 1,401   | 28.2  | 42.1  | 17   | 40.5  | 41.6  | 3,458   | 53.9  | 43.1  | 41.7                         |
| Upper                                                                            | 17                               | 39.5  | 36.3  | 2,560   | 51.6  | 43.2  | 15   | 35.7  | 31.9  | 2,487   | 38.8  | 37.8  | 33.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                            | 43                               | 100.0 | 100.0 | 4,966   | 100.0 | 100.0 | 42   | 100.0 | 100.0 | 6,411   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D69B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Battle Creek MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-----------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                       | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                       | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                       | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                   | 1                                | 12.5  | 0.0   | 10      | 1.6   | 0.0   | 0    | 0.0   | 1.9   | 0       | 0.0   | 1.0   | 3.9                          |
| Moderate                                                                                                              | 3                                | 37.5  | 17.6  | 120     | 19.6  | 14.4  | 1    | 14.3  | 16.2  | 42      | 9.1   | 9.8   | 21.5                         |
| Middle                                                                                                                | 2                                | 25.0  | 47.1  | 359     | 58.8  | 38.6  | 2    | 28.6  | 42.9  | 100     | 21.6  | 40.5  | 41.7                         |
| Upper                                                                                                                 | 2                                | 25.0  | 35.3  | 122     | 20.0  | 47.0  | 4    | 57.1  | 39.0  | 322     | 69.4  | 48.6  | 33.0                         |
| Unknown                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                 | 8                                | 100.0 | 100.0 | 611     | 100.0 | 100.0 | 7    | 100.0 | 100.0 | 464     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                   | 0                                | 0.0   | 2.9   | 0       | 0.0   | 1.0   | 0    | 0.0   | 2.4   | 0       | 0.0   | 1.1   | 3.9                          |
| Moderate                                                                                                              | 1                                | 100.0 | 23.2  | 63      | 100.0 | 15.0  | 0    | 0.0   | 16.7  | 0       | 0.0   | 8.9   | 21.5                         |
| Middle                                                                                                                | 0                                | 0.0   | 39.1  | 0       | 0.0   | 45.3  | 1    | 100.0 | 39.3  | 60      | 100.0 | 48.2  | 41.7                         |
| Upper                                                                                                                 | 0                                | 0.0   | 34.8  | 0       | 0.0   | 38.7  | 0    | 0.0   | 41.7  | 0       | 0.0   | 41.8  | 33.0                         |
| Unknown                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                 | 1                                | 100.0 | 100.0 | 63      | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 60      | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                   | 0                                | 0.0   | 2.5   | 0       | 0.0   | 2.5   | 0    | 0.0   | 6.5   | 0       | 0.0   | 4.0   | 3.9                          |
| Moderate                                                                                                              | 0                                | 0.0   | 35.0  | 0       | 0.0   | 24.9  | 0    | 0.0   | 38.7  | 0       | 0.0   | 25.8  | 21.5                         |
| Middle                                                                                                                | 0                                | 0.0   | 27.5  | 0       | 0.0   | 26.1  | 0    | 0.0   | 32.3  | 0       | 0.0   | 30.9  | 41.7                         |
| Upper                                                                                                                 | 0                                | 0.0   | 35.0  | 0       | 0.0   | 46.5  | 0    | 0.0   | 22.6  | 0       | 0.0   | 39.3  | 33.0                         |
| Unknown                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                 | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D70A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Battle Creek MSA                                       |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.8   | 0       | 0.0   | 1.0   | 5.2                          |
| Moderate                                                                | 1                        | 50.0  | 21.0  | 59      | 47.6  | 12.8  | 21.1                         |
| Middle                                                                  | 1                        | 50.0  | 38.6  | 65      | 52.4  | 39.3  | 42.7                         |
| Upper                                                                   | 0                        | 0.0   | 38.6  | 0       | 0.0   | 46.9  | 31.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 124     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.2   | 0       | 0.0   | 0.5   | 5.2                          |
| Moderate                                                                | 4                        | 21.1  | 11.3  | 278     | 15.5  | 6.7   | 21.1                         |
| Middle                                                                  | 3                        | 15.8  | 43.0  | 180     | 10.0  | 41.7  | 42.7                         |
| Upper                                                                   | 12                       | 63.2  | 44.5  | 1,336   | 74.5  | 51.1  | 31.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 19                       | 100.0 | 100.0 | 1,794   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.3   | 0       | 0.0   | 0.7   | 5.2                          |
| Moderate                                                                | 2                        | 33.3  | 16.4  | 99      | 24.9  | 11.8  | 21.1                         |
| Middle                                                                  | 3                        | 50.0  | 40.9  | 198     | 49.9  | 41.7  | 42.7                         |
| Upper                                                                   | 1                        | 16.7  | 41.3  | 100     | 25.2  | 45.8  | 31.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 6                        | 100.0 | 100.0 | 397     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 16.7  | 0       | 0.0   | 7.7   | 10.2                         |
| Moderate                                                                | 0                        | 0.0   | 50.0  | 0       | 0.0   | 67.3  | 36.5                         |
| Middle                                                                  | 0                        | 0.0   | 25.0  | 0       | 0.0   | 3.0   | 29.5                         |
| Upper                                                                   | 0                        | 0.0   | 8.3   | 0       | 0.0   | 22.0  | 23.8                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 1.5   | 0       | 0.0   | 1.0   | 5.2                          |
| Moderate                                                                | 7                        | 21.9  | 15.6  | 436     | 16.0  | 11.4  | 21.1                         |
| Middle                                                                  | 8                        | 25.0  | 40.9  | 464     | 17.0  | 39.3  | 42.7                         |
| Upper                                                                   | 17                       | 53.1  | 41.9  | 1,827   | 67.0  | 48.3  | 31.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 32                       | 100.0 | 100.0 | 2,727   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |



Table D70B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Battle Creek MSA                                                |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income Level                                                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.3   | 0       | 0.0   | 3.4   | 5.2                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 10.1  | 0       | 0.0   | 7.6   | 21.1                         |
| Middle                                                                                                                                                      | 1                        | 20.0  | 46.4  | 21      | 5.1   | 49.0  | 42.7                         |
| Upper                                                                                                                                                       | 4                        | 80.0  | 39.1  | 391     | 94.9  | 40.0  | 31.0                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 5                        | 100.0 | 100.0 | 412     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.7   | 0       | 0.0   | 1.0   | 5.2                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 9.5   | 0       | 0.0   | 4.7   | 21.1                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 39.2  | 0       | 0.0   | 41.1  | 42.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 48.6  | 0       | 0.0   | 53.2  | 31.0                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.0   | 0       | 0.0   | 1.6   | 5.2                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 26.9  | 0       | 0.0   | 19.5  | 21.1                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 29.9  | 0       | 0.0   | 31.9  | 42.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 40.3  | 0       | 0.0   | 47.1  | 31.0                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

Table D71

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Battle Creek MSA                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 10                               | 13.0  | 8.8   | 2,304   | 14.7  | 8.6   | 4    | 7.4   | 4.5   | 555     | 3.6   | 2.6   | 5.6                      |
| Moderate                                                                                                                                                                                  | 44                               | 57.1  | 24.2  | 8,585   | 54.8  | 32.6  | 24   | 44.4  | 25.3  | 7,486   | 48.4  | 33.9  | 30.7                     |
| Middle                                                                                                                                                                                    | 10                               | 13.0  | 33.9  | 2,880   | 18.4  | 32.8  | 19   | 35.2  | 36.8  | 6,478   | 41.9  | 35.3  | 38.6                     |
| Upper                                                                                                                                                                                     | 13                               | 16.9  | 32.6  | 1,885   | 12.0  | 25.4  | 7    | 13.0  | 32.8  | 958     | 6.2   | 27.9  | 25.1                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 77                               | 100.0 | 100.0 | 15,654  | 100.0 | 100.0 | 54   | 100.0 | 100.0 | 15,477  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D72**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Battle Creek MSA                                                                             |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| <b>Low</b>                                                                                                                                                                                | 15                       | 9.9   | 7.7   | 2,990   | 9.3   | 7.4   | 8.3                      |
| <b>Moderate</b>                                                                                                                                                                           | 72                       | 47.7  | 25.2  | 16,716  | 52.2  | 33.8  | 26.2                     |
| <b>Middle</b>                                                                                                                                                                             | 21                       | 13.9  | 33.8  | 5,273   | 16.5  | 29.4  | 34.6                     |
| <b>Upper</b>                                                                                                                                                                              | 43                       | 28.5  | 33.0  | 7,037   | 22.0  | 29.2  | 30.9                     |
| <b>Unknown</b>                                                                                                                                                                            | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| <b>Total</b>                                                                                                                                                                              | 151                      | 100.0 | 100.0 | 32,016  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D73A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Battle Creek MSA                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 1                                | 16.7  | 7.2   | 62      | 7.6   | 3.8   | 0    | 0.0   | 8.9   | 0       | 0.0   | 5.3   | 21.9                              |
| Moderate                                                                     | 1                                | 16.7  | 26.4  | 165     | 20.2  | 19.0  | 1    | 100.0 | 28.5  | 47      | 100.0 | 21.9  | 17.2                              |
| Middle                                                                       | 3                                | 50.0  | 23.1  | 421     | 51.6  | 21.3  | 0    | 0.0   | 24.3  | 0       | 0.0   | 23.9  | 19.8                              |
| Upper                                                                        | 1                                | 16.7  | 33.1  | 168     | 20.6  | 45.9  | 0    | 0.0   | 23.7  | 0       | 0.0   | 34.1  | 41.2                              |
| Unknown                                                                      | 0                                | 0.0   | 10.2  | 0       | 0.0   | 10.0  | 0    | 0.0   | 14.8  | 0       | 0.0   | 14.9  | 0.0                               |
| Total                                                                        | 6                                | 100.0 | 100.0 | 816     | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 47      | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 4                                | 22.2  | 5.7   | 375     | 15.2  | 3.0   | 6    | 26.1  | 12.0  | 554     | 16.9  | 7.0   | 21.9                              |
| Moderate                                                                     | 5                                | 27.8  | 16.5  | 420     | 17.0  | 11.3  | 7    | 30.4  | 26.4  | 687     | 20.9  | 20.9  | 17.2                              |
| Middle                                                                       | 4                                | 22.2  | 25.0  | 370     | 14.9  | 21.2  | 4    | 17.4  | 26.1  | 522     | 15.9  | 26.1  | 19.8                              |
| Upper                                                                        | 5                                | 27.8  | 38.8  | 1,310   | 52.9  | 48.0  | 5    | 21.7  | 28.1  | 1,424   | 43.3  | 37.6  | 41.2                              |
| Unknown                                                                      | 0                                | 0.0   | 13.9  | 0       | 0.0   | 16.6  | 1    | 4.3   | 7.4   | 100     | 3.0   | 8.4   | 0.0                               |
| Total                                                                        | 18                               | 100.0 | 100.0 | 2,475   | 100.0 | 100.0 | 23   | 100.0 | 100.0 | 3,287   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 1                                | 11.1  | 8.4   | 92      | 10.7  | 5.1   | 2    | 22.2  | 10.1  | 51      | 9.2   | 8.2   | 21.9                              |
| Moderate                                                                     | 1                                | 11.1  | 21.3  | 51      | 5.9   | 16.0  | 1    | 11.1  | 22.6  | 61      | 11.0  | 19.4  | 17.2                              |
| Middle                                                                       | 2                                | 22.2  | 23.3  | 107     | 12.5  | 20.7  | 1    | 11.1  | 27.5  | 17      | 3.1   | 26.5  | 19.8                              |
| Upper                                                                        | 5                                | 55.6  | 45.4  | 608     | 70.9  | 57.2  | 4    | 44.4  | 37.0  | 350     | 63.3  | 43.7  | 41.2                              |
| Unknown                                                                      | 0                                | 0.0   | 1.6   | 0       | 0.0   | 1.0   | 1    | 11.1  | 2.8   | 74      | 13.4  | 2.3   | 0.0                               |
| Total                                                                        | 9                                | 100.0 | 100.0 | 858     | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 553     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 8                                | 19.0  | 6.5   | 599     | 12.4  | 3.4   | 10   | 24.4  | 10.0  | 680     | 15.4  | 6.0   | 21.9                              |
| Moderate                                                                     | 9                                | 21.4  | 20.8  | 736     | 15.3  | 15.0  | 11   | 26.8  | 26.8  | 1,013   | 23.0  | 21.3  | 17.2                              |
| Middle                                                                       | 10                               | 23.8  | 23.8  | 908     | 18.8  | 21.0  | 5    | 12.2  | 25.2  | 539     | 12.2  | 24.6  | 19.8                              |
| Upper                                                                        | 15                               | 35.7  | 36.7  | 2,580   | 53.5  | 47.1  | 11   | 26.8  | 26.8  | 1,895   | 43.0  | 35.6  | 41.2                              |
| Unknown                                                                      | 0                                | 0.0   | 12.2  | 0       | 0.0   | 13.4  | 4    | 9.8   | 11.3  | 284     | 6.4   | 12.5  | 0.0                               |
| Total                                                                        | 42                               | 100.0 | 100.0 | 4,823   | 100.0 | 100.0 | 41   | 100.0 | 100.0 | 4,411   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D73B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Battle Creek MSA                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                                | 25.0  | 7.4   | 70      | 11.5  | 4.6   | 2    | 28.6  | 8.6   | 75      | 16.2  | 7.9   | 21.9                              |
| Moderate                                                                                                                                                    | 2                                | 25.0  | 26.5  | 100     | 16.4  | 21.7  | 2    | 28.6  | 30.5  | 218     | 47.0  | 24.4  | 17.2                              |
| Middle                                                                                                                                                      | 1                                | 12.5  | 19.1  | 10      | 1.6   | 13.8  | 0    | 0.0   | 24.8  | 0       | 0.0   | 21.7  | 19.8                              |
| Upper                                                                                                                                                       | 3                                | 37.5  | 44.1  | 431     | 70.5  | 57.1  | 2    | 28.6  | 35.2  | 121     | 26.1  | 45.3  | 41.2                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 2.9   | 0       | 0.0   | 2.7   | 1    | 14.3  | 1.0   | 50      | 10.8  | 0.6   | 0.0                               |
| Total                                                                                                                                                       | 8                                | 100.0 | 100.0 | 611     | 100.0 | 100.0 | 7    | 100.0 | 100.0 | 464     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 10.1  | 0       | 0.0   | 6.6   | 0    | 0.0   | 9.5   | 0       | 0.0   | 6.5   | 21.9                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 14.5  | 0       | 0.0   | 9.5   | 0    | 0.0   | 15.5  | 0       | 0.0   | 12.8  | 17.2                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 20.3  | 0       | 0.0   | 14.1  | 0    | 0.0   | 32.1  | 0       | 0.0   | 32.9  | 19.8                              |
| Upper                                                                                                                                                       | 1                                | 100.0 | 50.7  | 63      | 100.0 | 61.0  | 0    | 0.0   | 41.7  | 0       | 0.0   | 46.9  | 41.2                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 4.3   | 0       | 0.0   | 8.7   | 1    | 100.0 | 1.2   | 60      | 100.0 | 0.9   | 0.0                               |
| Total                                                                                                                                                       | 1                                | 100.0 | 100.0 | 63      | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 60      | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.9                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.2                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.8                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.2                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D74A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Battle Creek MSA |                          |       |       |         |       |       |                                   |
|----------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                          | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                      | 1                        | 50.0  | 9.1   | 65      | 52.4  | 5.1   | 21.7                              |
| Moderate                                                                                                 | 1                        | 50.0  | 24.2  | 59      | 47.6  | 18.0  | 17.8                              |
| Middle                                                                                                   | 0                        | 0.0   | 25.1  | 0       | 0.0   | 24.1  | 19.6                              |
| Upper                                                                                                    | 0                        | 0.0   | 31.8  | 0       | 0.0   | 43.2  | 40.9                              |
| Unknown                                                                                                  | 0                        | 0.0   | 9.8   | 0       | 0.0   | 9.6   | 0.0                               |
| Total                                                                                                    | 2                        | 100.0 | 100.0 | 124     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                      | 3                        | 15.8  | 5.7   | 192     | 10.7  | 2.7   | 21.7                              |
| Moderate                                                                                                 | 4                        | 21.1  | 14.5  | 244     | 13.6  | 9.4   | 17.8                              |
| Middle                                                                                                   | 7                        | 36.8  | 21.4  | 637     | 35.5  | 17.9  | 19.6                              |
| Upper                                                                                                    | 5                        | 26.3  | 42.3  | 721     | 40.2  | 52.0  | 40.9                              |
| Unknown                                                                                                  | 0                        | 0.0   | 16.2  | 0       | 0.0   | 18.0  | 0.0                               |
| Total                                                                                                    | 19                       | 100.0 | 100.0 | 1,794   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                      | 1                        | 16.7  | 8.0   | 60      | 15.1  | 6.3   | 21.7                              |
| Moderate                                                                                                 | 1                        | 16.7  | 16.4  | 50      | 12.6  | 14.2  | 17.8                              |
| Middle                                                                                                   | 2                        | 33.3  | 25.8  | 109     | 27.5  | 23.4  | 19.6                              |
| Upper                                                                                                    | 2                        | 33.3  | 48.9  | 178     | 44.8  | 55.4  | 40.9                              |
| Unknown                                                                                                  | 0                        | 0.0   | 0.9   | 0       | 0.0   | 0.7   | 0.0                               |
| Total                                                                                                    | 6                        | 100.0 | 100.0 | 397     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                      | 5                        | 15.6  | 7.0   | 317     | 11.6  | 3.7   | 21.7                              |
| Moderate                                                                                                 | 6                        | 18.8  | 18.0  | 353     | 12.9  | 12.8  | 17.8                              |
| Middle                                                                                                   | 12                       | 37.5  | 22.4  | 1,023   | 37.5  | 20.1  | 19.6                              |
| Upper                                                                                                    | 9                        | 28.1  | 37.6  | 1,034   | 37.9  | 47.8  | 40.9                              |
| Unknown                                                                                                  | 0                        | 0.0   | 15.0  | 0       | 0.0   | 15.6  | 0.0                               |
| Total                                                                                                    | 32                       | 100.0 | 100.0 | 2,727   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                           |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                  |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                           |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                |                          |       |       |         |       |       |                                   |

Table D74B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Battle Creek MSA                                                    |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 10.1  | 0       | 0.0   | 11.1  | 21.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 20.3  | 0       | 0.0   | 15.8  | 17.8                              |
| Middle                                                                                                                                                      | 3                        | 60.0  | 31.9  | 277     | 67.2  | 23.5  | 19.6                              |
| Upper                                                                                                                                                       | 2                        | 40.0  | 36.2  | 135     | 32.8  | 49.0  | 40.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 1.4   | 0       | 0.0   | 0.5   | 0.0                               |
| Total                                                                                                                                                       | 5                        | 100.0 | 100.0 | 412     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 6.8   | 0       | 0.0   | 3.8   | 21.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 21.6  | 0       | 0.0   | 13.2  | 17.8                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 16.2  | 0       | 0.0   | 11.6  | 19.6                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 50.0  | 0       | 0.0   | 67.5  | 40.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 5.4   | 0       | 0.0   | 3.9   | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.8                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.6                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table D75**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-------|--------------------------|
| Assessment Area: Battle Creek MSA                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |       |                          |
|                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |       |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| \$1 Million or Less                                                                | 25                               | 32.5  | 46.8  | 3,145   | 20.1  | 33.9  | 19   | 35.2  | 49.4  | 2,483   | 16.0  | 34.1  | 89.4  |                          |
| Over \$1 Million                                                                   | 39                               | 50.6  |       | 11,709  | 74.8  |       | 31   | 57.4  |       | 12,674  | 81.9  |       | 9.4   |                          |
| Revenue Unknown                                                                    | 13                               | 16.9  |       | 800     | 5.1   |       | 4    | 7.4   |       | 320     | 2.1   |       | 1.2   |                          |
| Total                                                                              | 77                               | 100.0 |       | 15,654  | 100.0 |       | 54   | 100.0 |       | 15,477  | 100.0 |       | 100.0 |                          |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| \$100,000 or Less                                                                  | 41                               | 53.2  | 91.9  | 2,110   | 13.5  | 40.2  | 20   | 37.0  | 94.3  | 1,039   | 6.7   | 40.3  |       |                          |
| \$100,001 - \$250,000                                                              | 17                               | 22.1  | 5.2   | 2,693   | 17.2  | 24.1  | 12   | 22.2  | 3.1   | 2,122   | 13.7  | 17.8  |       |                          |
| \$250,001 - \$1 Million                                                            | 19                               | 24.7  | 2.8   | 10,851  | 69.3  | 35.7  | 22   | 40.7  | 2.7   | 12,316  | 79.6  | 41.9  |       |                          |
| Total                                                                              | 77                               | 100.0 | 100.0 | 15,654  | 100.0 | 100.0 | 54   | 100.0 | 100.0 | 15,477  | 100.0 | 100.0 |       |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| \$100,000 or Less                                                                  | 17                               | 68.0  |       | 806     | 25.6  |       | 12   | 63.2  |       | 609     | 24.5  |       |       |                          |
| \$100,001 - \$250,000                                                              | 5                                | 20.0  |       | 883     | 28.1  |       | 6    | 31.6  |       | 1,097   | 44.2  |       |       |                          |
| \$250,001 - \$1 Million                                                            | 3                                | 12.0  |       | 1,456   | 46.3  |       | 1    | 5.3   |       | 777     | 31.3  |       |       |                          |
| Total                                                                              | 25                               | 100.0 |       | 3,145   | 100.0 |       | 19   | 100.0 |       | 2,483   | 100.0 |       |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |

**Table D76**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Battle Creek MSA                                         |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 61                       | 40.4  | 28.9  | 7,577   | 23.7  | 18.6  | 89.2                     |
| Over \$1 Million                                                          | 66                       | 43.7  |       | 20,562  | 64.2  |       | 9.8                      |
| Revenue Unknown                                                           | 24                       | 15.9  |       | 3,877   | 12.1  |       | 1.0                      |
| Total                                                                     | 151                      | 100.0 |       | 32,016  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 74                       | 49.0  | 86.9  | 3,502   | 10.9  | 31.1  |                          |
| \$100,001 - \$250,000                                                     | 32                       | 21.2  | 7.8   | 5,114   | 16.0  | 21.9  |                          |
| \$250,001 - \$1 Million                                                   | 45                       | 29.8  | 5.3   | 23,400  | 73.1  | 47.0  |                          |
| Total                                                                     | 151                      | 100.0 | 100.0 | 32,016  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 44                       | 72.1  |       | 1,872   | 24.7  |       |                          |
| \$100,001 - \$250,000                                                     | 9                        | 14.8  |       | 1,304   | 17.2  |       |                          |
| \$250,001 - \$1 Million                                                   | 8                        | 13.1  |       | 4,401   | 58.1  |       |                          |
| Total                                                                     | 61                       | 100.0 |       | 7,577   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table D77

| 2022 Combined Demographics<br>Assessment Area: Fenton MSA                                                                                                                                 |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 16                        | 11.9                  | 9,012                              | 8.3          | 3,511                                              | 39.0         | 23,052                    | 21.3         |
| Moderate                                                                                                                                                                                  | 33                        | 24.6                  | 21,362                             | 19.7         | 5,018                                              | 23.5         | 18,958                    | 17.5         |
| Middle                                                                                                                                                                                    | 41                        | 30.6                  | 34,988                             | 32.3         | 3,341                                              | 9.5          | 22,509                    | 20.8         |
| Upper                                                                                                                                                                                     | 39                        | 29.1                  | 40,177                             | 37.1         | 1,776                                              | 4.4          | 43,911                    | 40.5         |
| Unknown                                                                                                                                                                                   | 5                         | 3.7                   | 2,891                              | 2.7          | 393                                                | 13.6         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>134</b>                | <b>100.0</b>          | <b>108,430</b>                     | <b>100.0</b> | <b>14,039</b>                                      | <b>12.9</b>  | <b>108,430</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 20,522                    | 8,014                 | 6.7                                | 39.1         | 7,401                                              | 36.1         | 5,107                     | 24.9         |
| Moderate                                                                                                                                                                                  | 47,988                    | 20,839                | 17.5                               | 43.4         | 18,764                                             | 39.1         | 8,385                     | 17.5         |
| Middle                                                                                                                                                                                    | 58,678                    | 39,973                | 33.5                               | 68.1         | 14,016                                             | 23.9         | 4,689                     | 8.0          |
| Upper                                                                                                                                                                                     | 60,706                    | 47,609                | 39.9                               | 78.4         | 9,692                                              | 16.0         | 3,405                     | 5.6          |
| Unknown                                                                                                                                                                                   | 4,689                     | 2,949                 | 2.5                                | 62.9         | 1,324                                              | 28.2         | 416                       | 8.9          |
| <b>Total AA</b>                                                                                                                                                                           | <b>192,583</b>            | <b>119,384</b>        | <b>100.0</b>                       | <b>62.0</b>  | <b>51,197</b>                                      | <b>26.6</b>  | <b>22,002</b>             | <b>11.4</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 842                       | 5.8                   | 783                                | 5.8          | 55                                                 | 5.3          | 4                         | 3.4          |
| Moderate                                                                                                                                                                                  | 2,805                     | 19.3                  | 2,577                              | 19.2         | 210                                                | 20.2         | 18                        | 15.1         |
| Middle                                                                                                                                                                                    | 5,059                     | 34.7                  | 4,580                              | 34.2         | 433                                                | 41.6         | 46                        | 38.7         |
| Upper                                                                                                                                                                                     | 5,148                     | 35.3                  | 4,840                              | 36.1         | 266                                                | 25.5         | 42                        | 35.3         |
| Unknown                                                                                                                                                                                   | 712                       | 4.9                   | 625                                | 4.7          | 78                                                 | 7.5          | 9                         | 7.6          |
| <b>Total AA</b>                                                                                                                                                                           | <b>14,566</b>             | <b>100.0</b>          | <b>13,405</b>                      | <b>100.0</b> | <b>1,042</b>                                       | <b>100.0</b> | <b>119</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.0         |                                                    | 7.2          |                           | 0.8          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 2                         | 1.0                   | 2                                  | 1.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 9                         | 4.6                   | 9                                  | 4.7          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 90                        | 46.2                  | 87                                 | 45.5         | 3                                                  | 75.0         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 92                        | 47.2                  | 91                                 | 47.6         | 1                                                  | 25.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 2                         | 1.0                   | 2                                  | 1.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>195</b>                | <b>100.0</b>          | <b>191</b>                         | <b>100.0</b> | <b>4</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 97.9         |                                                    | 2.1          |                           | 0.0          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |



Table D78

| 2021 Combined Demographics<br>Assessment Area: Fenton MSA                                                                                                                                 |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 20                        | 15.3                  | 10,926                             | 10.2         | 5,076                                              | 46.5         | 25,191                    | 23.6         |
| Moderate                                                                                                                                                                                  | 28                        | 21.4                  | 17,635                             | 16.5         | 5,354                                              | 30.4         | 16,425                    | 15.4         |
| Middle                                                                                                                                                                                    | 47                        | 35.9                  | 39,617                             | 37.1         | 5,147                                              | 13.0         | 21,298                    | 20.0         |
| Upper                                                                                                                                                                                     | 34                        | 26.0                  | 38,469                             | 36.1         | 1,978                                              | 5.1          | 43,733                    | 41.0         |
| Unknown                                                                                                                                                                                   | 2                         | 1.5                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>131</b>                | <b>100.0</b>          | <b>106,647</b>                     | <b>100.0</b> | <b>17,555</b>                                      | <b>16.5</b>  | <b>106,647</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 25,965                    | 9,778                 | 8.5                                | 37.7         | 9,208                                              | 35.5         | 6,979                     | 26.9         |
| Moderate                                                                                                                                                                                  | 40,574                    | 17,059                | 14.9                               | 42.0         | 14,236                                             | 35.1         | 9,279                     | 22.9         |
| Middle                                                                                                                                                                                    | 67,526                    | 44,230                | 38.5                               | 65.5         | 16,987                                             | 25.2         | 6,309                     | 9.3          |
| Upper                                                                                                                                                                                     | 57,113                    | 43,756                | 38.1                               | 76.6         | 10,014                                             | 17.5         | 3,343                     | 5.9          |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>191,178</b>            | <b>114,823</b>        | <b>100.0</b>                       | <b>60.1</b>  | <b>50,445</b>                                      | <b>26.4</b>  | <b>25,910</b>             | <b>13.6</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1,492                     | 10.4                  | 1,343                              | 10.2         | 138                                                | 12.9         | 11                        | 10.0         |
| Moderate                                                                                                                                                                                  | 1,933                     | 13.4                  | 1,780                              | 13.5         | 141                                                | 13.2         | 12                        | 10.9         |
| Middle                                                                                                                                                                                    | 6,177                     | 43.0                  | 5,600                              | 42.4         | 530                                                | 49.4         | 47                        | 42.7         |
| Upper                                                                                                                                                                                     | 4,739                     | 33.0                  | 4,453                              | 33.7         | 247                                                | 23.0         | 39                        | 35.5         |
| Unknown                                                                                                                                                                                   | 39                        | 0.3                   | 22                                 | 0.2          | 16                                                 | 1.5          | 1                         | 0.9          |
| <b>Total AA</b>                                                                                                                                                                           | <b>14,380</b>             | <b>100.0</b>          | <b>13,198</b>                      | <b>100.0</b> | <b>1,072</b>                                       | <b>100.0</b> | <b>110</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>91.8</b>  |                                                    | <b>7.5</b>   |                           | <b>0.8</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 6                         | 3.0                   | 6                                  | 3.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 5                         | 2.5                   | 5                                  | 2.5          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 82                        | 40.6                  | 81                                 | 40.9         | 1                                                  | 25.0         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 109                       | 54.0                  | 106                                | 53.5         | 3                                                  | 75.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>202</b>                | <b>100.0</b>          | <b>198</b>                         | <b>100.0</b> | <b>4</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>98.0</b>  |                                                    | <b>2.0</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D79

| 2020 Combined Demographics<br>Assessment Area: Fenton MSA                                                                                                                                 |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 20                        | 15.3                  | 10,926                             | 10.2      | 5,076                                              | 46.5      | 25,191                    | 23.6      |
| Moderate                                                                                                                                                                                  | 28                        | 21.4                  | 17,635                             | 16.5      | 5,354                                              | 30.4      | 16,425                    | 15.4      |
| Middle                                                                                                                                                                                    | 47                        | 35.9                  | 39,617                             | 37.1      | 5,147                                              | 13.0      | 21,298                    | 20.0      |
| Upper                                                                                                                                                                                     | 34                        | 26.0                  | 38,469                             | 36.1      | 1,978                                              | 5.1       | 43,733                    | 41.0      |
| Unknown                                                                                                                                                                                   | 2                         | 1.5                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 131                       | 100.0                 | 106,647                            | 100.0     | 17,555                                             | 16.5      | 106,647                   | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 25,965                    | 9,778                 | 8.5                                | 37.7      | 9,208                                              | 35.5      | 6,979                     | 26.9      |
| Moderate                                                                                                                                                                                  | 40,574                    | 17,059                | 14.9                               | 42.0      | 14,236                                             | 35.1      | 9,279                     | 22.9      |
| Middle                                                                                                                                                                                    | 67,526                    | 44,230                | 38.5                               | 65.5      | 16,987                                             | 25.2      | 6,309                     | 9.3       |
| Upper                                                                                                                                                                                     | 57,113                    | 43,756                | 38.1                               | 76.6      | 10,014                                             | 17.5      | 3,343                     | 5.9       |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 191,178                   | 114,823               | 100.0                              | 60.1      | 50,445                                             | 26.4      | 25,910                    | 13.6      |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 1,419                     | 9.9                   | 1,269                              | 9.6       | 140                                                | 12.8      | 10                        | 9.6       |
| Moderate                                                                                                                                                                                  | 1,863                     | 13.0                  | 1,704                              | 12.9      | 147                                                | 13.5      | 12                        | 11.5      |
| Middle                                                                                                                                                                                    | 6,179                     | 43.0                  | 5,602                              | 42.6      | 532                                                | 48.8      | 45                        | 43.3      |
| Upper                                                                                                                                                                                     | 4,853                     | 33.8                  | 4,563                              | 34.7      | 254                                                | 23.3      | 36                        | 34.6      |
| Unknown                                                                                                                                                                                   | 40                        | 0.3                   | 22                                 | 0.2       | 17                                                 | 1.6       | 1                         | 1.0       |
| Total AA                                                                                                                                                                                  | 14,354                    | 100.0                 | 13,160                             | 100.0     | 1,090                                              | 100.0     | 104                       | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 91.7      |                                                    | 7.6       |                           | 0.7       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 8                         | 3.8                   | 8                                  | 3.9       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 6                         | 2.9                   | 6                                  | 2.9       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 85                        | 40.5                  | 85                                 | 41.1      | 0                                                  | 0.0       | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 111                       | 52.9                  | 108                                | 52.2      | 3                                                  | 100.0     | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 210                       | 100.0                 | 207                                | 100.0     | 3                                                  | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 98.6      |                                                    | 1.4       |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

Table D80A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Fenton MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                   | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                 | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                             | 0                                | 0.0   | 2.5   | 0       | 0.0   | 1.0   | 0    | 0.0   | 2.6   | 0       | 0.0   | 1.3   | 6.7                          |
| Moderate                                                                                                        | 1                                | 33.3  | 7.4   | 165     | 36.3  | 4.2   | 1    | 20.0  | 13.1  | 180     | 18.5  | 7.9   | 17.5                         |
| Middle                                                                                                          | 1                                | 33.3  | 43.6  | 190     | 41.8  | 35.4  | 2    | 40.0  | 36.2  | 185     | 19.0  | 30.5  | 33.5                         |
| Upper                                                                                                           | 1                                | 33.3  | 46.5  | 100     | 22.0  | 59.3  | 2    | 40.0  | 46.0  | 608     | 62.5  | 57.2  | 39.9                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.1   | 0       | 0.0   | 3.1   | 2.5                          |
| Total                                                                                                           | 3                                | 100.0 | 100.0 | 455     | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 973     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                             | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.3   | 0    | 0.0   | 1.7   | 0       | 0.0   | 1.0   | 6.7                          |
| Moderate                                                                                                        | 0                                | 0.0   | 3.5   | 0       | 0.0   | 2.2   | 2    | 40.0  | 8.7   | 223     | 50.3  | 5.0   | 17.5                         |
| Middle                                                                                                          | 2                                | 25.0  | 36.0  | 284     | 26.3  | 27.9  | 2    | 40.0  | 34.6  | 170     | 38.4  | 28.6  | 33.5                         |
| Upper                                                                                                           | 6                                | 75.0  | 59.6  | 795     | 73.7  | 69.6  | 1    | 20.0  | 52.3  | 50      | 11.3  | 62.0  | 39.9                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.6   | 0       | 0.0   | 3.4   | 2.5                          |
| Total                                                                                                           | 8                                | 100.0 | 100.0 | 1,079   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 443     | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                             | 0                                | 0.0   | 1.6   | 0       | 0.0   | 0.7   | 0    | 0.0   | 2.7   | 0       | 0.0   | 1.5   | 6.7                          |
| Moderate                                                                                                        | 0                                | 0.0   | 6.2   | 0       | 0.0   | 3.3   | 0    | 0.0   | 8.6   | 0       | 0.0   | 5.2   | 17.5                         |
| Middle                                                                                                          | 0                                | 0.0   | 33.8  | 0       | 0.0   | 29.2  | 1    | 16.7  | 28.3  | 50      | 12.4  | 23.9  | 33.5                         |
| Upper                                                                                                           | 5                                | 100.0 | 58.3  | 273     | 100.0 | 66.9  | 5    | 83.3  | 58.3  | 353     | 87.6  | 66.6  | 39.9                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.2   | 0       | 0.0   | 2.7   | 2.5                          |
| Total                                                                                                           | 5                                | 100.0 | 100.0 | 273     | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 403     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                             | 0                                | 0.0   | 18.2  | 0       | 0.0   | 2.8   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 8.9                          |
| Moderate                                                                                                        | 0                                | 0.0   | 13.6  | 0       | 0.0   | 16.4  | 0    | 0.0   | 40.0  | 0       | 0.0   | 45.6  | 36.1                         |
| Middle                                                                                                          | 0                                | 0.0   | 36.4  | 0       | 0.0   | 57.1  | 0    | 0.0   | 23.3  | 0       | 0.0   | 39.0  | 23.6                         |
| Upper                                                                                                           | 0                                | 0.0   | 31.8  | 0       | 0.0   | 23.8  | 0    | 0.0   | 30.0  | 0       | 0.0   | 12.9  | 26.9                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 6.7   | 0       | 0.0   | 2.5   | 4.5                          |
| Total                                                                                                           | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                             | 0                                | 0.0   | 1.5   | 0       | 0.0   | 0.7   | 0    | 0.0   | 2.3   | 0       | 0.0   | 1.2   | 6.7                          |
| Moderate                                                                                                        | 1                                | 5.9   | 5.3   | 165     | 8.0   | 3.4   | 4    | 19.0  | 11.3  | 464     | 22.6  | 9.6   | 17.5                         |
| Middle                                                                                                          | 3                                | 17.6  | 38.9  | 474     | 23.0  | 31.7  | 6    | 28.6  | 34.7  | 455     | 22.1  | 30.2  | 33.5                         |
| Upper                                                                                                           | 13                               | 76.5  | 54.2  | 1,418   | 68.9  | 64.2  | 11   | 52.4  | 49.4  | 1,136   | 55.3  | 55.8  | 39.9                         |
| Unknown                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.3   | 0       | 0.0   | 3.2   | 2.5                          |
| Total                                                                                                           | 17                               | 100.0 | 100.0 | 2,057   | 100.0 | 100.0 | 21   | 100.0 | 100.0 | 2,055   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D80B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Fenton MSA                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 2.0   | 0       | 0.0   | 1.0   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.4   | 6.7                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 8.4   | 0       | 0.0   | 5.0   | 0    | 0.0   | 6.9   | 0       | 0.0   | 4.6   | 17.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 30.4  | 0       | 0.0   | 25.0  | 1    | 25.0  | 29.4  | 50      | 28.6  | 23.1  | 33.5                         |
| Upper                                                                                                                                                       | 1                                | 100.0 | 59.2  | 250     | 100.0 | 69.0  | 3    | 75.0  | 60.8  | 125     | 71.4  | 67.2  | 39.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.8   | 0       | 0.0   | 4.7   | 2.5                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 1                                | 100.0 | 100.0 | 250     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 175     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 1.4   | 0       | 0.0   | 0.9   | 0    | 0.0   | 3.1   | 0       | 0.0   | 2.3   | 6.7                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 10.4  | 0       | 0.0   | 7.3   | 1    | 100.0 | 12.1  | 61      | 100.0 | 8.5   | 17.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 38.0  | 0       | 0.0   | 32.2  | 0    | 0.0   | 33.9  | 0       | 0.0   | 28.1  | 33.5                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 50.1  | 0       | 0.0   | 59.6  | 0    | 0.0   | 48.2  | 0       | 0.0   | 57.1  | 39.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.7   | 0       | 0.0   | 4.0   | 2.5                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 61      | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 2.9   | 0       | 0.0   | 1.5   | 0    | 0.0   | 5.0   | 0       | 0.0   | 2.3   | 6.7                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 10.8  | 0       | 0.0   | 6.1   | 0    | 0.0   | 17.5  | 0       | 0.0   | 10.8  | 17.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 44.6  | 0       | 0.0   | 36.5  | 0    | 0.0   | 38.8  | 0       | 0.0   | 32.0  | 33.5                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 41.7  | 0       | 0.0   | 55.8  | 0    | 0.0   | 36.3  | 0       | 0.0   | 52.4  | 39.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.5   | 0       | 0.0   | 2.5   | 2.5                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D81A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Fenton MSA                                             |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.9   | 0       | 0.0   | 0.8   | 8.5                          |
| Moderate                                                                | 0                        | 0.0   | 6.2   | 0       | 0.0   | 3.4   | 14.9                         |
| Middle                                                                  | 0                        | 0.0   | 42.1  | 0       | 0.0   | 33.2  | 38.5                         |
| Upper                                                                   | 2                        | 100.0 | 49.8  | 513     | 100.0 | 62.6  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 513     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 8.5                          |
| Moderate                                                                | 0                        | 0.0   | 2.5   | 0       | 0.0   | 1.6   | 14.9                         |
| Middle                                                                  | 2                        | 28.6  | 32.2  | 236     | 19.7  | 24.4  | 38.5                         |
| Upper                                                                   | 5                        | 71.4  | 64.9  | 963     | 80.3  | 73.9  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 7                        | 100.0 | 100.0 | 1,199   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.5   | 0       | 0.0   | 0.4   | 8.5                          |
| Moderate                                                                | 0                        | 0.0   | 3.0   | 0       | 0.0   | 1.7   | 14.9                         |
| Middle                                                                  | 2                        | 50.0  | 39.3  | 211     | 67.8  | 30.9  | 38.5                         |
| Upper                                                                   | 2                        | 50.0  | 56.3  | 100     | 32.2  | 67.0  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 4                        | 100.0 | 100.0 | 311     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 17.4  | 0       | 0.0   | 3.6   |                              |
| Moderate                                                                | 0                        | 0.0   | 21.7  | 0       | 0.0   | 33.9  | 24.3                         |
| Middle                                                                  | 0                        | 0.0   | 26.1  | 0       | 0.0   | 39.5  | 35.7                         |
| Upper                                                                   | 0                        | 0.0   | 34.8  | 0       | 0.0   | 23.0  | 25.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 1.1   | 0       | 0.0   | 0.5   |                              |
| Moderate                                                                | 0                        | 0.0   | 4.3   | 0       | 0.0   | 3.2   | 14.9                         |
| Middle                                                                  | 4                        | 28.6  | 36.7  | 447     | 21.6  | 28.4  | 38.5                         |
| Upper                                                                   | 10                       | 71.4  | 57.9  | 1,626   | 78.4  | 67.9  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 14                       | 100.0 | 100.0 | 2,073   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D81B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Fenton MSA                                             |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 8.5                          |
| Moderate                                                                | 0                        | 0.0   | 10.5  | 0       | 0.0   | 6.5   | 14.9                         |
| Middle                                                                  | 0                        | 0.0   | 33.1  | 0       | 0.0   | 26.5  | 38.5                         |
| Upper                                                                   | 1                        | 100.0 | 56.4  | 50      | 100.0 | 66.9  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 1                        | 100.0 | 100.0 | 50      | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.5   | 0       | 0.0   | 1.3   | 8.5                          |
| Moderate                                                                | 0                        | 0.0   | 7.2   | 0       | 0.0   | 3.5   | 14.9                         |
| Middle                                                                  | 0                        | 0.0   | 44.4  | 0       | 0.0   | 36.3  | 38.5                         |
| Upper                                                                   | 0                        | 0.0   | 45.9  | 0       | 0.0   | 58.8  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.7   | 0       | 0.0   | 1.8   | 8.5                          |
| Moderate                                                                | 0                        | 0.0   | 13.3  | 0       | 0.0   | 6.0   | 14.9                         |
| Middle                                                                  | 0                        | 0.0   | 46.7  | 0       | 0.0   | 41.5  | 38.5                         |
| Upper                                                                   | 0                        | 0.0   | 36.3  | 0       | 0.0   | 50.7  | 38.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table D82**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Fenton MSA                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 2                                | 5.4   | 8.8   | 678     | 6.1   | 8.3   | 1    | 3.8   | 3.5   | 85      | 1.1   | 5.7   | 5.8                      |
| Moderate                                                                                                                                                                                  | 1                                | 2.7   | 12.8  | 85      | 0.8   | 12.1  | 2    | 7.7   | 17.3  | 295     | 4.0   | 23.3  | 19.3                     |
| Middle                                                                                                                                                                                    | 23                               | 62.2  | 40.4  | 7,839   | 70.9  | 48.2  | 14   | 53.8  | 30.8  | 4,532   | 61.3  | 34.3  | 34.7                     |
| Upper                                                                                                                                                                                     | 11                               | 29.7  | 37.3  | 2,447   | 22.1  | 31.1  | 9    | 34.6  | 41.8  | 2,485   | 33.6  | 31.9  | 35.3                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 6.0   | 0       | 0.0   | 4.5   | 4.9                      |
| Total                                                                                                                                                                                     | 37                               | 100.0 | 100.0 | 11,049  | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 7,397   | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D83**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Fenton MSA |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                     | 3                        | 5.3   | 9.0   | 978     | 8.7   | 9.3   | 9.9                      |
| Moderate                                                                                                | 3                        | 5.3   | 10.9  | 308     | 2.8   | 10.9  | 13.0                     |
| Middle                                                                                                  | 32                       | 56.1  | 42.6  | 6,351   | 56.7  | 49.1  | 43.0                     |
| Upper                                                                                                   | 18                       | 31.6  | 36.9  | 3,093   | 27.6  | 29.9  | 33.8                     |
| Unknown                                                                                                 | 1                        | 1.8   | 0.2   | 466     | 4.2   | 0.5   | 0.3                      |
| Total                                                                                                   | 57                       | 100.0 | 100.0 | 11,196  | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table D84A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Fenton MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 7.9   | 0       | 0.0   | 3.7   | 0    | 0.0   | 8.1   | 0       | 0.0   | 3.6   | 21.3                              |
| Moderate                                                                                                    | 2                                | 66.7  | 23.4  | 290     | 63.7  | 16.8  | 3    | 60.0  | 22.1  | 365     | 37.5  | 15.7  | 17.5                              |
| Middle                                                                                                      | 0                                | 0.0   | 23.0  | 0       | 0.0   | 22.8  | 0    | 0.0   | 22.0  | 0       | 0.0   | 21.0  | 20.8                              |
| Upper                                                                                                       | 1                                | 33.3  | 27.6  | 165     | 36.3  | 38.4  | 1    | 20.0  | 27.6  | 340     | 34.9  | 40.0  | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 18.0  | 0       | 0.0   | 18.2  | 1    | 20.0  | 20.2  | 268     | 27.5  | 19.7  | 0.0                               |
| Total                                                                                                       | 3                                | 100.0 | 100.0 | 455     | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 973     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 4.8   | 0       | 0.0   | 2.6   | 0    | 0.0   | 9.3   | 0       | 0.0   | 5.3   | 21.3                              |
| Moderate                                                                                                    | 3                                | 37.5  | 17.8  | 322     | 29.8  | 12.5  | 0    | 0.0   | 23.7  | 0       | 0.0   | 17.7  | 17.5                              |
| Middle                                                                                                      | 1                                | 12.5  | 24.2  | 150     | 13.9  | 21.2  | 3    | 60.0  | 26.0  | 293     | 66.1  | 24.9  | 20.8                              |
| Upper                                                                                                       | 2                                | 25.0  | 36.9  | 193     | 17.9  | 46.2  | 1    | 20.0  | 31.1  | 50      | 11.3  | 41.4  | 40.5                              |
| Unknown                                                                                                     | 2                                | 25.0  | 16.2  | 414     | 38.4  | 17.5  | 1    | 20.0  | 9.9   | 100     | 22.6  | 10.6  | 0.0                               |
| Total                                                                                                       | 8                                | 100.0 | 100.0 | 1,079   | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 443     | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 6.7   | 0       | 0.0   | 3.7   | 0    | 0.0   | 6.5   | 0       | 0.0   | 4.0   | 21.3                              |
| Moderate                                                                                                    | 1                                | 20.0  | 18.6  | 28      | 10.3  | 16.0  | 0    | 0.0   | 19.7  | 0       | 0.0   | 16.2  | 17.5                              |
| Middle                                                                                                      | 0                                | 0.0   | 25.7  | 0       | 0.0   | 22.7  | 2    | 33.3  | 22.3  | 123     | 30.5  | 18.9  | 20.8                              |
| Upper                                                                                                       | 4                                | 80.0  | 46.6  | 245     | 89.7  | 53.6  | 2    | 33.3  | 49.9  | 224     | 55.6  | 59.5  | 40.5                              |
| Unknown                                                                                                     | 0                                | 0.0   | 2.5   | 0       | 0.0   | 4.0   | 2    | 33.3  | 1.5   | 56      | 13.9  | 1.3   | 0.0                               |
| Total                                                                                                       | 5                                | 100.0 | 100.0 | 273     | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 403     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                         | 0                                | 0.0   | 6.1   | 0       | 0.0   | 3.1   | 0    | 0.0   | 8.4   | 0       | 0.0   | 4.2   | 21.3                              |
| Moderate                                                                                                    | 6                                | 35.3  | 19.9  | 640     | 31.1  | 14.4  | 4    | 19.0  | 22.0  | 415     | 20.2  | 16.1  | 17.5                              |
| Middle                                                                                                      | 1                                | 5.9   | 23.5  | 150     | 7.3   | 21.8  | 6    | 28.6  | 23.3  | 477     | 23.2  | 21.9  | 20.8                              |
| Upper                                                                                                       | 8                                | 47.1  | 33.8  | 853     | 41.5  | 43.1  | 7    | 33.3  | 31.6  | 739     | 36.0  | 41.6  | 40.5                              |
| Unknown                                                                                                     | 2                                | 11.8  | 16.7  | 414     | 20.1  | 17.7  | 4    | 19.0  | 14.8  | 424     | 20.6  | 16.2  | 0.0                               |
| Total                                                                                                       | 17                               | 100.0 | 100.0 | 2,057   | 100.0 | 100.0 | 21   | 100.0 | 100.0 | 2,055   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |



Table D84B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Fenton MSA                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 8.4   | 0       | 0.0   | 6.7   | 0    | 0.0   | 6.9   | 0       | 0.0   | 5.0   | 21.3                              |
| Moderate                                                                     | 0                                | 0.0   | 18.4  | 0       | 0.0   | 15.7  | 1    | 25.0  | 17.0  | 50      | 28.6  | 11.5  | 17.5                              |
| Middle                                                                       | 0                                | 0.0   | 15.6  | 0       | 0.0   | 14.8  | 0    | 0.0   | 22.1  | 0       | 0.0   | 17.1  | 20.8                              |
| Upper                                                                        | 1                                | 100.0 | 54.4  | 250     | 100.0 | 58.8  | 3    | 75.0  | 49.8  | 125     | 71.4  | 63.4  | 40.5                              |
| Unknown                                                                      | 0                                | 0.0   | 3.2   | 0       | 0.0   | 4.0   | 0    | 0.0   | 4.2   | 0       | 0.0   | 3.0   | 0.0                               |
| Total                                                                        | 1                                | 100.0 | 100.0 | 250     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 175     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 6.7   | 0       | 0.0   | 3.6   | 0    | 0.0   | 11.7  | 0       | 0.0   | 8.7   | 21.3                              |
| Moderate                                                                     | 0                                | 0.0   | 22.9  | 0       | 0.0   | 14.4  | 0    | 0.0   | 21.5  | 0       | 0.0   | 15.3  | 17.5                              |
| Middle                                                                       | 0                                | 0.0   | 19.7  | 0       | 0.0   | 16.8  | 1    | 100.0 | 28.0  | 61      | 100.0 | 25.6  | 20.8                              |
| Upper                                                                        | 0                                | 0.0   | 47.8  | 0       | 0.0   | 62.4  | 0    | 0.0   | 37.0  | 0       | 0.0   | 48.3  | 40.5                              |
| Unknown                                                                      | 0                                | 0.0   | 2.9   | 0       | 0.0   | 2.9   | 0    | 0.0   | 1.8   | 0       | 0.0   | 2.1   | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 61      | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.3                              |
| Moderate                                                                     | 0                                | 0.0   | 0.7   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.5                              |
| Middle                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.5   | 0       | 0.0   | 2.1   | 20.8                              |
| Upper                                                                        | 0                                | 0.0   | 0.7   | 0       | 0.0   | 1.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.5                              |
| Unknown                                                                      | 0                                | 0.0   | 98.6  | 0       | 0.0   | 98.4  | 0    | 0.0   | 97.5  | 0       | 0.0   | 97.9  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D85A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Fenton MSA |                          |       |       |         |       |       |                                   |
|----------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                        | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                    | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                    | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 7.4   | 0       | 0.0   | 3.6   | 23.6                              |
| Moderate                                                                                           | 1                        | 50.0  | 22.0  | 160     | 31.2  | 16.3  | 15.4                              |
| Middle                                                                                             | 0                        | 0.0   | 26.7  | 0       | 0.0   | 25.7  | 20.0                              |
| Upper                                                                                              | 1                        | 50.0  | 29.7  | 353     | 68.8  | 40.6  | 41.0                              |
| Unknown                                                                                            | 0                        | 0.0   | 14.2  | 0       | 0.0   | 13.8  | 0.0                               |
| Total                                                                                              | 2                        | 100.0 | 100.0 | 513     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 3.2   | 0       | 0.0   | 1.6   | 23.6                              |
| Moderate                                                                                           | 0                        | 0.0   | 11.6  | 0       | 0.0   | 7.6   | 15.4                              |
| Middle                                                                                             | 2                        | 28.6  | 22.4  | 346     | 28.9  | 17.9  | 20.0                              |
| Upper                                                                                              | 2                        | 28.6  | 45.9  | 343     | 28.6  | 54.9  | 41.0                              |
| Unknown                                                                                            | 3                        | 42.9  | 16.9  | 510     | 42.5  | 18.0  | 0.0                               |
| Total                                                                                              | 7                        | 100.0 | 100.0 | 1,199   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                             |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 5.6   | 0       | 0.0   | 2.5   | 23.6                              |
| Moderate                                                                                           | 0                        | 0.0   | 16.8  | 0       | 0.0   | 12.2  | 15.4                              |
| Middle                                                                                             | 3                        | 75.0  | 24.3  | 271     | 87.1  | 19.8  | 20.0                              |
| Upper                                                                                              | 1                        | 25.0  | 47.5  | 40      | 12.9  | 57.6  | 41.0                              |
| Unknown                                                                                            | 0                        | 0.0   | 5.8   | 0       | 0.0   | 7.9   | 0.0                               |
| Total                                                                                              | 4                        | 100.0 | 100.0 | 311     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                | 0                        | 0.0   | 4.9   | 0       | 0.0   | 2.4   | 23.6                              |
| Moderate                                                                                           | 1                        | 7.1   | 15.6  | 160     | 7.7   | 10.9  | 15.4                              |
| Middle                                                                                             | 5                        | 35.7  | 23.5  | 617     | 29.8  | 20.7  | 20.0                              |
| Upper                                                                                              | 5                        | 35.7  | 38.9  | 786     | 37.9  | 48.8  | 41.0                              |
| Unknown                                                                                            | 3                        | 21.4  | 17.1  | 510     | 24.6  | 17.1  | 0.0                               |
| Total                                                                                              | 14                       | 100.0 | 100.0 | 2,073   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                     |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                            |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                     |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                          |                          |       |       |         |       |       |                                   |

Table D85B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Fenton MSA                                         |                          |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                     | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                       |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 8.7   | 0       | 0.0   | 6.0   | 23.6                              |
| Moderate                                                            | 0                        | 0.0   | 17.4  | 0       | 0.0   | 11.4  | 15.4                              |
| Middle                                                              | 0                        | 0.0   | 18.6  | 0       | 0.0   | 11.8  | 20.0                              |
| Upper                                                               | 1                        | 100.0 | 53.5  | 50      | 100.0 | 69.5  | 41.0                              |
| Unknown                                                             | 0                        | 0.0   | 1.7   | 0       | 0.0   | 1.2   | 0.0                               |
| Total                                                               | 1                        | 100.0 | 100.0 | 50      | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                         |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 9.3   | 0       | 0.0   | 5.5   | 23.6                              |
| Moderate                                                            | 0                        | 0.0   | 20.1  | 0       | 0.0   | 14.7  | 15.4                              |
| Middle                                                              | 0                        | 0.0   | 22.6  | 0       | 0.0   | 24.1  | 20.0                              |
| Upper                                                               | 0                        | 0.0   | 45.9  | 0       | 0.0   | 52.5  | 41.0                              |
| Unknown                                                             | 0                        | 0.0   | 2.2   | 0       | 0.0   | 3.2   | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                              |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 23.6                              |
| Moderate                                                            | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 15.4                              |
| Middle                                                              | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.0                              |
| Upper                                                               | 0                        | 0.0   | 0.5   | 0       | 0.0   | 0.5   | 41.0                              |
| Unknown                                                             | 0                        | 0.0   | 99.0  | 0       | 0.0   | 99.0  | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.      |                          |       |       |         |       |       |                                   |

**Table D86**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Fenton MSA                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 8                                | 21.6  | 41.8  | 922     | 8.3   | 24.0  | 3    | 11.5  | 48.4  | 437     | 5.9   | 26.9  | 92.0                     |
| Over \$1 Million                                                                   | 23                               | 62.2  |       | 9,770   | 88.4  |       | 22   | 84.6  |       | 6,935   | 93.8  |       | 7.2                      |
| Revenue Unknown                                                                    | 6                                | 16.2  |       | 357     | 3.2   |       | 1    | 3.8   |       | 25      | 0.3   |       | 0.8                      |
| Total                                                                              | 37                               | 100.0 |       | 11,049  | 100.0 |       | 26   | 100.0 |       | 7,397   | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 15                               | 40.5  | 90.5  | 911     | 8.2   | 33.8  | 10   | 38.5  | 94.8  | 670     | 9.1   | 40.5  |                          |
| \$100,001 - \$250,000                                                              | 9                                | 24.3  | 5.8   | 1,687   | 15.3  | 21.5  | 8    | 30.8  | 2.8   | 1,725   | 23.3  | 14.3  |                          |
| \$250,001 - \$1 Million                                                            | 13                               | 35.1  | 3.7   | 8,451   | 76.5  | 44.7  | 8    | 30.8  | 2.4   | 5,002   | 67.6  | 45.2  |                          |
| Total                                                                              | 37                               | 100.0 | 100.0 | 11,049  | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 7,397   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 6                                | 75.0  |       | 389     | 42.2  |       | 2    | 66.7  |       | 185     | 42.3  |       |                          |
| \$100,001 - \$250,000                                                              | 1                                | 12.5  |       | 105     | 11.4  |       | 0    | 0.0   |       | 0       | 0.0   |       |                          |
| \$250,001 - \$1 Million                                                            | 1                                | 12.5  |       | 428     | 46.4  |       | 1    | 33.3  |       | 252     | 57.7  |       |                          |
| Total                                                                              | 8                                | 100.0 |       | 922     | 100.0 |       | 3    | 100.0 |       | 437     | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D87**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Fenton MSA                                               |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 23                       | 40.4  | 43.1  | 3,199   | 28.6  | 26.8  | 91.7                     |
| Over \$1 Million                                                          | 28                       | 49.1  |       | 7,572   | 67.6  |       | 7.6                      |
| Revenue Unknown                                                           | 6                        | 10.5  |       | 425     | 3.8   |       | 0.7                      |
| Total                                                                     | 57                       | 100.0 |       | 11,196  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 28                       | 49.1  | 86.4  | 1,313   | 11.7  | 31.1  |                          |
| \$100,001 - \$250,000                                                     | 13                       | 22.8  | 8.1   | 2,294   | 20.5  | 21.8  |                          |
| \$250,001 - \$1 Million                                                   | 16                       | 28.1  | 5.5   | 7,589   | 67.8  | 47.1  |                          |
| Total                                                                     | 57                       | 100.0 | 100.0 | 11,196  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 15                       | 65.2  |       | 569     | 17.8  |       |                          |
| \$100,001 - \$250,000                                                     | 3                        | 13.0  |       | 359     | 11.2  |       |                          |
| \$250,001 - \$1 Million                                                   | 5                        | 21.7  |       | 2,271   | 71.0  |       |                          |
| Total                                                                     | 23                       | 100.0 |       | 3,199   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

**Table D88**

| 2022 Combined Demographics                                     |                           |                       |                                    |              |                                                    |              |                           |              |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Grand Rapids-Kentwood Metropolitan            |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 11                        | 5.2                   | 7,745                              | 3.3          | 1,899                                              | 24.5         | 42,756                    | 18.0         |
| Moderate                                                       | 38                        | 18.1                  | 35,778                             | 15.0         | 4,831                                              | 13.5         | 42,648                    | 17.9         |
| Middle                                                         | 104                       | 49.5                  | 114,401                            | 48.1         | 6,320                                              | 5.5          | 55,302                    | 23.2         |
| Upper                                                          | 53                        | 25.2                  | 76,884                             | 32.3         | 1,435                                              | 1.9          | 97,259                    | 40.9         |
| Unknown                                                        | 4                         | 1.9                   | 3,157                              | 1.3          | 320                                                | 10.1         | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>210</b>                | <b>100.0</b>          | <b>237,965</b>                     | <b>100.0</b> | <b>14,805</b>                                      | <b>6.2</b>   | <b>237,965</b>            | <b>100.0</b> |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                            | 14,123                    | 4,702                 | 1.8                                | 33.3         | 8,410                                              | 59.5         | 1,011                     | 7.2          |
| Moderate                                                       | 63,324                    | 33,249                | 13.1                               | 52.5         | 25,855                                             | 40.8         | 4,220                     | 6.7          |
| Middle                                                         | 182,519                   | 125,886               | 49.5                               | 69.0         | 48,033                                             | 26.3         | 8,600                     | 4.7          |
| Upper                                                          | 102,929                   | 87,435                | 34.4                               | 84.9         | 11,436                                             | 11.1         | 4,058                     | 3.9          |
| Unknown                                                        | 4,768                     | 2,919                 | 1.1                                | 61.2         | 1,456                                              | 30.5         | 393                       | 8.2          |
| <b>Total AA</b>                                                | <b>367,663</b>            | <b>254,191</b>        | <b>100.0</b>                       | <b>69.1</b>  | <b>95,190</b>                                      | <b>25.9</b>  | <b>18,282</b>             | <b>5.0</b>   |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 923                       | 2.4                   | 827                                | 2.4          | 94                                                 | 2.3          | 2                         | 0.6          |
| Moderate                                                       | 6,754                     | 17.5                  | 5,707                              | 16.7         | 1,002                                              | 24.6         | 45                        | 13.8         |
| Middle                                                         | 17,934                    | 46.4                  | 15,950                             | 46.6         | 1,833                                              | 45.0         | 151                       | 46.5         |
| Upper                                                          | 12,693                    | 32.9                  | 11,450                             | 33.4         | 1,120                                              | 27.5         | 123                       | 37.8         |
| Unknown                                                        | 324                       | 0.8                   | 298                                | 0.9          | 22                                                 | 0.5          | 4                         | 1.2          |
| <b>Total AA</b>                                                | <b>38,628</b>             | <b>100.0</b>          | <b>34,232</b>                      | <b>100.0</b> | <b>4,071</b>                                       | <b>100.0</b> | <b>325</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                |                           |                       |                                    | 88.6         |                                                    | 10.5         |                           | 0.8          |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 5                         | 0.7                   | 5                                  | 0.7          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                       | 50                        | 6.6                   | 45                                 | 6.4          | 5                                                  | 9.3          | 0                         | 0.0          |
| Middle                                                         | 414                       | 54.5                  | 383                                | 54.3         | 31                                                 | 57.4         | 0                         | 0.0          |
| Upper                                                          | 285                       | 37.5                  | 267                                | 37.9         | 18                                                 | 33.3         | 0                         | 0.0          |
| Unknown                                                        | 5                         | 0.7                   | 5                                  | 0.7          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>759</b>                | <b>100.0</b>          | <b>705</b>                         | <b>100.0</b> | <b>54</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                     |                           |                       |                                    | 92.9         |                                                    | 7.1          |                           | 0.0          |
| Source: 2022 FFIEC Census Data                                 |                           |                       |                                    |              |                                                    |              |                           |              |
| 2022 Dun & Bradstreet Data                                     |                           |                       |                                    |              |                                                    |              |                           |              |
| 2016-2020 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D89**

| 2021 Combined Demographics                                     |                           |                       |                                    |              |                                                    |              |                           |              |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Grand Rapids-Kentwood Metropolitan            |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 12                        | 6.6                   | 7,778                              | 3.5          | 3,245                                              | 41.7         | 42,098                    | 18.7         |
| Moderate                                                       | 33                        | 18.1                  | 33,662                             | 14.9         | 6,327                                              | 18.8         | 39,134                    | 17.4         |
| Middle                                                         | 90                        | 49.5                  | 115,651                            | 51.3         | 8,403                                              | 7.3          | 49,913                    | 22.1         |
| Upper                                                          | 46                        | 25.3                  | 68,308                             | 30.3         | 2,379                                              | 3.5          | 94,254                    | 41.8         |
| Unknown                                                        | 1                         | 0.5                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>182</b>                | <b>100.0</b>          | <b>225,399</b>                     | <b>100.0</b> | <b>20,354</b>                                      | <b>9.0</b>   | <b>225,399</b>            | <b>100.0</b> |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                            | 15,395                    | 4,718                 | 2.0                                | 30.6         | 8,400                                              | 54.6         | 2,277                     | 14.8         |
| Moderate                                                       | 62,933                    | 28,754                | 12.3                               | 45.7         | 29,441                                             | 46.8         | 4,738                     | 7.5          |
| Middle                                                         | 181,174                   | 125,000               | 53.4                               | 69.0         | 45,196                                             | 24.9         | 10,978                    | 6.1          |
| Upper                                                          | 92,569                    | 75,801                | 32.4                               | 81.9         | 11,934                                             | 12.9         | 4,834                     | 5.2          |
| Unknown                                                        | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>352,071</b>            | <b>234,273</b>        | <b>100.0</b>                       | <b>66.5</b>  | <b>94,971</b>                                      | <b>27.0</b>  | <b>22,827</b>             | <b>6.5</b>   |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 1,362                     | 3.5                   | 1,098                              | 3.2          | 258                                                | 6.3          | 6                         | 2.0          |
| Moderate                                                       | 5,625                     | 14.5                  | 4,919                              | 14.3         | 683                                                | 16.6         | 23                        | 7.8          |
| Middle                                                         | 18,961                    | 49.0                  | 16,776                             | 48.9         | 2,037                                              | 49.4         | 148                       | 50.0         |
| Upper                                                          | 12,749                    | 32.9                  | 11,488                             | 33.5         | 1,142                                              | 27.7         | 119                       | 40.2         |
| Unknown                                                        | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>38,697</b>             | <b>100.0</b>          | <b>34,281</b>                      | <b>100.0</b> | <b>4,120</b>                                       | <b>100.0</b> | <b>296</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                         |                           |                       |                                    | <b>88.6</b>  |                                                    | <b>10.6</b>  |                           | <b>0.8</b>   |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 4                         | 0.5                   | 4                                  | 0.6          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                       | 23                        | 3.0                   | 16                                 | 2.2          | 7                                                  | 12.3         | 0                         | 0.0          |
| Middle                                                         | 467                       | 60.4                  | 428                                | 59.8         | 39                                                 | 68.4         | 0                         | 0.0          |
| Upper                                                          | 279                       | 36.1                  | 268                                | 37.4         | 11                                                 | 19.3         | 0                         | 0.0          |
| Unknown                                                        | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>773</b>                | <b>100.0</b>          | <b>716</b>                         | <b>100.0</b> | <b>57</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                              |                           |                       |                                    | <b>92.6</b>  |                                                    | <b>7.4</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data                                 |                           |                       |                                    |              |                                                    |              |                           |              |
| 2021 Dun & Bradstreet Data                                     |                           |                       |                                    |              |                                                    |              |                           |              |
| 2011-2015 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table D90**

| 2020 Combined Demographics                                     |                           |                       |                                    |              |                                                    |              |                           |              |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Grand Rapids-Kentwood Metropolitan            |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 12                        | 6.6                   | 7,778                              | 3.5          | 3,245                                              | 41.7         | 42,098                    | 18.7         |
| Moderate                                                       | 33                        | 18.1                  | 33,662                             | 14.9         | 6,327                                              | 18.8         | 39,134                    | 17.4         |
| Middle                                                         | 90                        | 49.5                  | 115,651                            | 51.3         | 8,403                                              | 7.3          | 49,913                    | 22.1         |
| Upper                                                          | 46                        | 25.3                  | 68,308                             | 30.3         | 2,379                                              | 3.5          | 94,254                    | 41.8         |
| Unknown                                                        | 1                         | 0.5                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>182</b>                | <b>100.0</b>          | <b>225,399</b>                     | <b>100.0</b> | <b>20,354</b>                                      | <b>9.0</b>   | <b>225,399</b>            | <b>100.0</b> |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                            | 15,395                    | 4,718                 | 2.0                                | 30.6         | 8,400                                              | 54.6         | 2,277                     | 14.8         |
| Moderate                                                       | 62,933                    | 28,754                | 12.3                               | 45.7         | 29,441                                             | 46.8         | 4,738                     | 7.5          |
| Middle                                                         | 181,174                   | 125,000               | 53.4                               | 69.0         | 45,196                                             | 24.9         | 10,978                    | 6.1          |
| Upper                                                          | 92,569                    | 75,801                | 32.4                               | 81.9         | 11,934                                             | 12.9         | 4,834                     | 5.2          |
| Unknown                                                        | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>352,071</b>            | <b>234,273</b>        | <b>100.0</b>                       | <b>66.5</b>  | <b>94,971</b>                                      | <b>27.0</b>  | <b>22,827</b>             | <b>6.5</b>   |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 1,324                     | 3.4                   | 1,065                              | 3.1          | 254                                                | 6.1          | 5                         | 1.8          |
| Moderate                                                       | 5,541                     | 14.2                  | 4,834                              | 14.0         | 686                                                | 16.4         | 21                        | 7.4          |
| Middle                                                         | 19,177                    | 49.2                  | 16,965                             | 49.1         | 2,073                                              | 49.5         | 139                       | 48.9         |
| Upper                                                          | 12,954                    | 33.2                  | 11,658                             | 33.8         | 1,177                                              | 28.1         | 119                       | 41.9         |
| Unknown                                                        | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>38,996</b>             | <b>100.0</b>          | <b>34,522</b>                      | <b>100.0</b> | <b>4,190</b>                                       | <b>100.0</b> | <b>284</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                         |                           |                       |                                    | <b>88.5</b>  |                                                    | <b>10.7</b>  |                           | <b>0.7</b>   |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                            | 3                         | 0.4                   | 3                                  | 0.4          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                       | 22                        | 2.8                   | 16                                 | 2.2          | 6                                                  | 10.0         | 0                         | 0.0          |
| Middle                                                         | 480                       | 60.8                  | 439                                | 60.1         | 41                                                 | 68.3         | 0                         | 0.0          |
| Upper                                                          | 285                       | 36.1                  | 272                                | 37.3         | 13                                                 | 21.7         | 0                         | 0.0          |
| Unknown                                                        | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                | <b>790</b>                | <b>100.0</b>          | <b>730</b>                         | <b>100.0</b> | <b>60</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                              |                           |                       |                                    | <b>92.4</b>  |                                                    | <b>7.6</b>   |                           | <b>0.0</b>   |
| Source: 2020 FFIEC Census Data                                 |                           |                       |                                    |              |                                                    |              |                           |              |
| 2020 Dun & Bradstreet Data                                     |                           |                       |                                    |              |                                                    |              |                           |              |
| 2011-2015 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D91A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Grand Rapids-Kentwood Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                         | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                         | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                     | 0                                | 0.0   | 3.3   | 0       | 0.0   | 2.0   | 2    | 15.4  | 3.2   | 344     | 12.7  | 1.8   | 1.8                          |
| Moderate                                                                                                                                | 8                                | 44.4  | 15.7  | 1,606   | 36.3  | 11.2  | 6    | 46.2  | 15.8  | 1,561   | 57.5  | 11.3  | 13.1                         |
| Middle                                                                                                                                  | 9                                | 50.0  | 52.1  | 2,571   | 58.1  | 49.1  | 4    | 30.8  | 49.1  | 744     | 27.4  | 45.7  | 49.5                         |
| Upper                                                                                                                                   | 1                                | 5.6   | 28.8  | 248     | 5.6   | 37.6  | 1    | 7.7   | 31.0  | 65      | 2.4   | 40.4  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.9   | 1.1                          |
| Total                                                                                                                                   | 18                               | 100.0 | 100.0 | 4,425   | 100.0 | 100.0 | 13   | 100.0 | 100.0 | 2,714   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                     | 3                                | 4.8   | 1.4   | 285     | 2.6   | 0.9   | 0    | 0.0   | 1.6   | 0       | 0.0   | 1.1   | 1.8                          |
| Moderate                                                                                                                                | 8                                | 12.7  | 11.4  | 1,260   | 11.5  | 7.8   | 3    | 6.5   | 14.5  | 374     | 4.8   | 11.0  | 13.1                         |
| Middle                                                                                                                                  | 29                               | 46.0  | 50.9  | 3,473   | 31.6  | 46.4  | 24   | 52.2  | 48.6  | 2,674   | 34.7  | 44.6  | 49.5                         |
| Upper                                                                                                                                   | 23                               | 36.5  | 36.3  | 5,968   | 54.3  | 44.9  | 19   | 41.3  | 34.2  | 4,666   | 60.5  | 42.4  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.9   | 1.1                          |
| Total                                                                                                                                   | 63                               | 100.0 | 100.0 | 10,986  | 100.0 | 100.0 | 46   | 100.0 | 100.0 | 7,714   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                     | 0                                | 0.0   | 1.5   | 0       | 0.0   | 1.0   | 0    | 0.0   | 1.1   | 0       | 0.0   | 0.7   | 1.8                          |
| Moderate                                                                                                                                | 3                                | 13.0  | 9.5   | 227     | 10.3  | 7.7   | 1    | 3.7   | 10.1  | 9       | 0.3   | 7.4   | 13.1                         |
| Middle                                                                                                                                  | 15                               | 65.2  | 50.4  | 1,251   | 56.8  | 45.5  | 17   | 63.0  | 48.7  | 1,546   | 53.9  | 44.2  | 49.5                         |
| Upper                                                                                                                                   | 5                                | 21.7  | 38.6  | 724     | 32.9  | 45.7  | 9    | 33.3  | 39.4  | 1,314   | 45.8  | 47.0  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 1.1                          |
| Total                                                                                                                                   | 23                               | 100.0 | 100.0 | 2,202   | 100.0 | 100.0 | 27   | 100.0 | 100.0 | 2,869   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                     | 0                                | 0.0   | 7.4   | 0       | 0.0   | 11.7  | 0    | 0.0   | 3.6   | 0       | 0.0   | 3.7   | 5.7                          |
| Moderate                                                                                                                                | 0                                | 0.0   | 27.8  | 0       | 0.0   | 23.0  | 0    | 0.0   | 19.1  | 0       | 0.0   | 30.9  | 24.1                         |
| Middle                                                                                                                                  | 0                                | 0.0   | 47.2  | 0       | 0.0   | 37.0  | 0    | 0.0   | 67.3  | 0       | 0.0   | 53.5  | 53.6                         |
| Upper                                                                                                                                   | 0                                | 0.0   | 17.6  | 0       | 0.0   | 28.3  | 0    | 0.0   | 10.0  | 0       | 0.0   | 11.9  | 14.3                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2.3                          |
| Total                                                                                                                                   | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                     | 3                                | 2.3   | 2.1   | 285     | 1.3   | 1.8   | 2    | 1.8   | 2.4   | 344     | 2.1   | 1.8   | 1.8                          |
| Moderate                                                                                                                                | 20                               | 15.5  | 12.8  | 3,165   | 15.0  | 9.8   | 11   | 9.8   | 14.2  | 2,072   | 12.4  | 13.1  | 13.1                         |
| Middle                                                                                                                                  | 68                               | 52.7  | 51.2  | 8,916   | 42.1  | 47.0  | 62   | 55.4  | 48.8  | 7,213   | 43.0  | 46.0  | 49.5                         |
| Upper                                                                                                                                   | 38                               | 29.5  | 33.9  | 8,801   | 41.6  | 41.4  | 37   | 33.0  | 33.6  | 7,139   | 42.6  | 38.4  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.8   | 1.1                          |
| Total                                                                                                                                   | 129                              | 100.0 | 100.0 | 21,167  | 100.0 | 100.0 | 112  | 100.0 | 100.0 | 16,768  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |



Table D91B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Grand Rapids-Kentwood Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                         | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                         | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                     | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.3   | 1.8                          |
| Moderate                                                                                                                                | 1                                | 4.2   | 8.5   | 72      | 2.1   | 5.0   | 0    | 0.0   | 8.7   | 0       | 0.0   | 5.1   | 13.1                         |
| Middle                                                                                                                                  | 14                               | 58.3  | 51.7  | 1,486   | 43.5  | 47.4  | 15   | 68.2  | 45.9  | 2,084   | 67.7  | 39.2  | 49.5                         |
| Upper                                                                                                                                   | 9                                | 37.5  | 39.1  | 1,861   | 54.4  | 47.2  | 7    | 31.8  | 43.6  | 994     | 32.3  | 54.6  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.8   | 1.1                          |
| Tract-Unk                                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                   | 24                               | 100.0 | 100.0 | 3,419   | 100.0 | 100.0 | 22   | 100.0 | 100.0 | 3,078   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                     | 0                                | 0.0   | 3.8   | 0       | 0.0   | 2.4   | 0    | 0.0   | 1.8   | 0       | 0.0   | 1.4   | 1.8                          |
| Moderate                                                                                                                                | 0                                | 0.0   | 14.7  | 0       | 0.0   | 9.5   | 1    | 25.0  | 14.3  | 128     | 32.6  | 10.6  | 13.1                         |
| Middle                                                                                                                                  | 1                                | 100.0 | 46.5  | 135     | 100.0 | 37.1  | 2    | 50.0  | 47.9  | 165     | 42.0  | 42.5  | 49.5                         |
| Upper                                                                                                                                   | 0                                | 0.0   | 34.9  | 0       | 0.0   | 51.0  | 1    | 25.0  | 35.0  | 100     | 25.4  | 44.9  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.6   | 1.1                          |
| Tract-Unk                                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                   | 1                                | 100.0 | 100.0 | 135     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 393     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                     | 0                                | 0.0   | 3.7   | 0       | 0.0   | 2.8   | 0    | 0.0   | 18.6  | 0       | 0.0   | 8.7   | 1.8                          |
| Moderate                                                                                                                                | 0                                | 0.0   | 39.3  | 0       | 0.0   | 20.0  | 0    | 0.0   | 12.8  | 0       | 0.0   | 14.3  | 13.1                         |
| Middle                                                                                                                                  | 0                                | 0.0   | 43.7  | 0       | 0.0   | 55.1  | 0    | 0.0   | 58.9  | 0       | 0.0   | 57.8  | 49.5                         |
| Upper                                                                                                                                   | 0                                | 0.0   | 13.3  | 0       | 0.0   | 22.1  | 0    | 0.0   | 8.9   | 0       | 0.0   | 17.8  | 34.4                         |
| Unknown                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.8   | 0       | 0.0   | 1.4   | 1.1                          |
| Tract-Unk                                                                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                   | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D92A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Grand Rapids-Kentwood Metropolitan |                          |       |       |         |       |       |                              |
|--------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                            |                          |       |       |         |       |       |                              |
| Low                                                                                                                            | 1                        | 6.7   | 2.9   | 238     | 6.5   | 1.8   | 2.0                          |
| Moderate                                                                                                                       | 4                        | 26.7  | 14.7  | 588     | 16.0  | 10.5  | 12.3                         |
| Middle                                                                                                                         | 6                        | 40.0  | 52.7  | 1,151   | 31.4  | 49.4  | 53.4                         |
| Upper                                                                                                                          | 4                        | 26.7  | 29.6  | 1,688   | 46.1  | 38.3  | 32.4                         |
| Unknown                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                          | 15                       | 100.0 | 100.0 | 3,665   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                |                          |       |       |         |       |       |                              |
| Low                                                                                                                            | 0                        | 0.0   | 1.0   | 0       | 0.0   | 0.6   | 2.0                          |
| Moderate                                                                                                                       | 11                       | 15.5  | 8.5   | 1,414   | 9.8   | 5.6   | 12.3                         |
| Middle                                                                                                                         | 31                       | 43.7  | 50.4  | 6,447   | 44.6  | 45.8  | 53.4                         |
| Upper                                                                                                                          | 29                       | 40.8  | 40.2  | 6,602   | 45.6  | 48.0  | 32.4                         |
| Unknown                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                          | 71                       | 100.0 | 100.0 | 14,463  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                         |                          |       |       |         |       |       |                              |
| Low                                                                                                                            | 0                        | 0.0   | 1.3   | 0       | 0.0   | 1.1   | 2.0                          |
| Moderate                                                                                                                       | 2                        | 8.3   | 7.7   | 79      | 3.5   | 5.6   | 12.3                         |
| Middle                                                                                                                         | 8                        | 33.3  | 51.0  | 650     | 29.0  | 46.1  | 53.4                         |
| Upper                                                                                                                          | 14                       | 58.3  | 40.0  | 1,512   | 67.5  | 47.3  | 32.4                         |
| Unknown                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                          | 24                       | 100.0 | 100.0 | 2,241   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                              |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                            | 0                        | 0.0   | 4.5   | 0       | 0.0   | 2.1   |                              |
| Moderate                                                                                                                       | 0                        | 0.0   | 29.2  | 0       | 0.0   | 49.6  | 31.3                         |
| Middle                                                                                                                         | 0                        | 0.0   | 52.8  | 0       | 0.0   | 39.8  | 49.9                         |
| Upper                                                                                                                          | 0                        | 0.0   | 13.5  | 0       | 0.0   | 8.4   | 14.4                         |
| Unknown                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                          | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                      |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                            | 1                        | 0.8   | 1.6   | 238     | 1.0   | 1.1   |                              |
| Moderate                                                                                                                       | 18                       | 14.0  | 10.6  | 2,131   | 9.0   | 9.6   | 12.3                         |
| Middle                                                                                                                         | 53                       | 41.1  | 51.1  | 9,336   | 39.4  | 46.6  | 53.4                         |
| Upper                                                                                                                          | 57                       | 44.2  | 36.6  | 12,018  | 50.7  | 42.7  | 32.4                         |
| Unknown                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                          | 129                      | 100.0 | 100.0 | 23,723  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                                 |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                        |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                 |                          |       |       |         |       |       |                              |

Table D92B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Grand Rapids-Kentwood Metropolitan                              |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.8   | 0       | 0.0   | 0.4   | 2.0                          |
| Moderate                                                                                                                                                    | 1                        | 5.6   | 7.6   | 50      | 1.7   | 4.2   | 12.3                         |
| Middle                                                                                                                                                      | 8                        | 44.4  | 49.4  | 1,088   | 36.8  | 45.3  | 53.4                         |
| Upper                                                                                                                                                       | 9                        | 50.0  | 42.3  | 1,816   | 61.5  | 50.1  | 32.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 18                       | 100.0 | 100.0 | 2,954   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.9   | 0       | 0.0   | 3.8   | 2.0                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 11.5  | 0       | 0.0   | 9.9   | 12.3                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 51.7  | 0       | 0.0   | 38.8  | 53.4                         |
| Upper                                                                                                                                                       | 1                        | 100.0 | 33.9  | 400     | 100.0 | 47.5  | 32.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 1                        | 100.0 | 100.0 | 400     | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 3.9   | 0       | 0.0   | 2.0   | 2.0                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 22.8  | 0       | 0.0   | 15.1  | 12.3                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 52.2  | 0       | 0.0   | 42.9  | 53.4                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 21.1  | 0       | 0.0   | 39.9  | 32.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table D93**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Grand Rapids-Kentwood Metropolitan                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                          |
| Low                                                                                                                                                                                       | 9                                | 4.1   | 3.5   | 2,367   | 4.0   | 4.9   | 6    | 3.4   | 2.1   | 1,589   | 2.9   | 2.4   | 2.4                      |
| Moderate                                                                                                                                                                                  | 36                               | 16.5  | 13.4  | 10,830  | 18.5  | 15.6  | 58   | 33.3  | 16.2  | 17,734  | 32.6  | 20.7  | 17.5                     |
| Middle                                                                                                                                                                                    | 101                              | 46.3  | 48.2  | 30,266  | 51.7  | 47.3  | 63   | 36.2  | 44.5  | 22,079  | 40.6  | 42.9  | 46.4                     |
| Upper                                                                                                                                                                                     | 72                               | 33.0  | 34.5  | 15,114  | 25.8  | 32.2  | 45   | 25.9  | 35.9  | 12,812  | 23.6  | 33.0  | 32.9                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2    | 1.1   | 0.7   | 160     | 0.3   | 0.9   | 0.8                      |
| Total                                                                                                                                                                                     | 218                              | 100.0 | 100.0 | 58,577  | 100.0 | 100.0 | 174  | 100.0 | 100.0 | 54,374  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D94**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Grand Rapids-Kentwood Metropolitan                                                           |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                                                                                       | 14                       | 4.4   | 3.6   | 3,275   | 4.6   | 5.0   | 3.4                      |
| Moderate                                                                                                                                                                                  | 68                       | 21.6  | 14.1  | 21,577  | 30.1  | 16.2  | 14.2                     |
| Middle                                                                                                                                                                                    | 130                      | 41.3  | 48.1  | 29,262  | 40.8  | 46.8  | 49.2                     |
| Upper                                                                                                                                                                                     | 103                      | 32.7  | 34.0  | 17,641  | 24.6  | 31.9  | 33.2                     |
| Unknown                                                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 315                      | 100.0 | 100.0 | 71,755  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D95A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Grand Rapids-Kentwood Metropolitan                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 11.1  | 7.9   | 217     | 4.9   | 4.5   | 3    | 23.1  | 8.0   | 275     | 10.1  | 4.1   | 18.0                              |
| Moderate                                                                     | 4                                | 22.2  | 22.3  | 639     | 14.4  | 16.4  | 1    | 7.7   | 23.3  | 344     | 12.7  | 16.9  | 17.9                              |
| Middle                                                                       | 3                                | 16.7  | 22.5  | 739     | 16.7  | 20.4  | 3    | 23.1  | 22.3  | 642     | 23.7  | 20.4  | 23.2                              |
| Upper                                                                        | 8                                | 44.4  | 34.0  | 2,720   | 61.5  | 46.1  | 6    | 46.2  | 32.9  | 1,453   | 53.5  | 46.1  | 40.9                              |
| Unknown                                                                      | 1                                | 5.6   | 13.2  | 110     | 2.5   | 12.7  | 0    | 0.0   | 13.5  | 0       | 0.0   | 12.5  | 0.0                               |
| Total                                                                        | 18                               | 100.0 | 100.0 | 4,425   | 100.0 | 100.0 | 13   | 100.0 | 100.0 | 2,714   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 7                                | 11.1  | 8.7   | 639     | 5.8   | 4.9   | 11   | 23.9  | 15.4  | 947     | 12.3  | 9.3   | 18.0                              |
| Moderate                                                                     | 12                               | 19.0  | 21.4  | 1,379   | 12.6  | 15.7  | 11   | 23.9  | 25.9  | 1,293   | 16.8  | 20.7  | 17.9                              |
| Middle                                                                       | 15                               | 23.8  | 23.9  | 1,827   | 16.6  | 21.3  | 9    | 19.6  | 22.4  | 1,752   | 22.7  | 21.2  | 23.2                              |
| Upper                                                                        | 25                               | 39.7  | 34.9  | 6,663   | 60.6  | 46.2  | 12   | 26.1  | 28.1  | 3,071   | 39.8  | 39.3  | 40.9                              |
| Unknown                                                                      | 4                                | 6.3   | 11.1  | 478     | 4.4   | 11.8  | 3    | 6.5   | 8.0   | 651     | 8.4   | 9.5   | 0.0                               |
| Total                                                                        | 63                               | 100.0 | 100.0 | 10,986  | 100.0 | 100.0 | 46   | 100.0 | 100.0 | 7,714   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 3                                | 13.0  | 6.2   | 168     | 7.6   | 4.2   | 6    | 22.2  | 7.8   | 254     | 8.9   | 4.4   | 18.0                              |
| Moderate                                                                     | 6                                | 26.1  | 19.4  | 398     | 18.1  | 14.9  | 8    | 29.6  | 21.3  | 566     | 19.7  | 15.9  | 17.9                              |
| Middle                                                                       | 2                                | 8.7   | 25.6  | 187     | 8.5   | 22.1  | 3    | 11.1  | 27.3  | 395     | 13.8  | 23.3  | 23.2                              |
| Upper                                                                        | 12                               | 52.2  | 46.4  | 1,449   | 65.8  | 56.1  | 10   | 37.0  | 41.3  | 1,654   | 57.7  | 54.1  | 40.9                              |
| Unknown                                                                      | 0                                | 0.0   | 2.5   | 0       | 0.0   | 2.7   | 0    | 0.0   | 2.3   | 0       | 0.0   | 2.3   | 0.0                               |
| Total                                                                        | 23                               | 100.0 | 100.0 | 2,202   | 100.0 | 100.0 | 27   | 100.0 | 100.0 | 2,869   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 15                               | 11.6  | 8.2   | 1,278   | 6.0   | 4.7   | 27   | 24.1  | 10.4  | 2,077   | 12.4  | 5.6   | 18.0                              |
| Moderate                                                                     | 24                               | 18.6  | 21.4  | 2,588   | 12.2  | 15.9  | 25   | 22.3  | 23.5  | 2,606   | 15.5  | 17.7  | 17.9                              |
| Middle                                                                       | 28                               | 21.7  | 23.4  | 3,757   | 17.7  | 20.8  | 18   | 16.1  | 23.1  | 3,021   | 18.0  | 20.7  | 23.2                              |
| Upper                                                                        | 56                               | 43.4  | 35.5  | 12,906  | 61.0  | 46.6  | 37   | 33.0  | 32.9  | 7,999   | 47.7  | 45.0  | 40.9                              |
| Unknown                                                                      | 6                                | 4.7   | 11.5  | 638     | 3.0   | 12.0  | 5    | 4.5   | 10.2  | 1,065   | 6.4   | 11.0  | 0.0                               |
| Total                                                                        | 129                              | 100.0 | 100.0 | 21,167  | 100.0 | 100.0 | 112  | 100.0 | 100.0 | 16,768  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D95B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Grand Rapids-Kentwood Metropolitan                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 3                                | 12.5  | 6.8   | 254     | 7.4   | 3.1   | 5    | 22.7  | 8.6   | 461     | 15.0  | 4.7   | 18.0                              |
| Moderate                                                                                                                                                    | 2                                | 8.3   | 16.6  | 172     | 5.0   | 11.7  | 3    | 13.6  | 19.2  | 150     | 4.9   | 12.7  | 17.9                              |
| Middle                                                                                                                                                      | 7                                | 29.2  | 24.7  | 869     | 25.4  | 19.5  | 3    | 13.6  | 25.2  | 232     | 7.5   | 19.4  | 23.2                              |
| Upper                                                                                                                                                       | 11                               | 45.8  | 49.6  | 2,074   | 60.7  | 64.1  | 9    | 40.9  | 43.4  | 1,821   | 59.2  | 59.7  | 40.9                              |
| Unknown                                                                                                                                                     | 1                                | 4.2   | 2.3   | 50      | 1.5   | 1.6   | 2    | 9.1   | 3.6   | 414     | 13.5  | 3.4   | 0.0                               |
| Total                                                                                                                                                       | 24                               | 100.0 | 100.0 | 3,419   | 100.0 | 100.0 | 22   | 100.0 | 100.0 | 3,078   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 8.4   | 0       | 0.0   | 4.5   | 2    | 50.0  | 12.4  | 140     | 35.6  | 7.2   | 18.0                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 21.2  | 0       | 0.0   | 13.4  | 2    | 50.0  | 23.8  | 253     | 64.4  | 17.1  | 17.9                              |
| Middle                                                                                                                                                      | 1                                | 100.0 | 21.4  | 135     | 100.0 | 15.5  | 0    | 0.0   | 26.7  | 0       | 0.0   | 19.6  | 23.2                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 45.2  | 0       | 0.0   | 60.9  | 0    | 0.0   | 33.9  | 0       | 0.0   | 53.0  | 40.9                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 3.8   | 0       | 0.0   | 5.8   | 0    | 0.0   | 3.2   | 0       | 0.0   | 3.1   | 0.0                               |
| Total                                                                                                                                                       | 1                                | 100.0 | 100.0 | 135     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 393     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 18.0                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.8   | 0       | 0.0   | 1.6   | 17.9                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 23.2                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.4   | 0       | 0.0   | 1.1   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.3   | 40.9                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 98.9  | 0       | 0.0   | 97.7  | 0    | 0.0   | 98.4  | 0       | 0.0   | 97.7  | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D96A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Grand Rapids-Kentwood Metropolitan |                          |       |       |         |       |       |                                   |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                            | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                                        | 1                        | 6.7   | 8.3   | 400     | 10.9  | 4.8   | 18.7                              |
| Moderate                                                                                                                   | 4                        | 26.7  | 27.0  | 741     | 20.2  | 20.5  | 17.4                              |
| Middle                                                                                                                     | 7                        | 46.7  | 23.7  | 1,297   | 35.4  | 21.9  | 22.1                              |
| Upper                                                                                                                      | 3                        | 20.0  | 33.5  | 1,227   | 33.5  | 45.7  | 41.8                              |
| Unknown                                                                                                                    | 0                        | 0.0   | 7.5   | 0       | 0.0   | 7.1   | 0.0                               |
| Total                                                                                                                      | 15                       | 100.0 | 100.0 | 3,665   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                            |                          |       |       |         |       |       |                                   |
| Low                                                                                                                        | 6                        | 8.5   | 5.4   | 613     | 4.2   | 2.8   | 18.7                              |
| Moderate                                                                                                                   | 17                       | 23.9  | 18.4  | 2,261   | 15.6  | 12.8  | 17.4                              |
| Middle                                                                                                                     | 16                       | 22.5  | 24.4  | 2,936   | 20.3  | 20.8  | 22.1                              |
| Upper                                                                                                                      | 24                       | 33.8  | 42.1  | 7,194   | 49.7  | 53.4  | 41.8                              |
| Unknown                                                                                                                    | 8                        | 11.3  | 9.7   | 1,459   | 10.1  | 10.1  | 0.0                               |
| Total                                                                                                                      | 71                       | 100.0 | 100.0 | 14,463  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                                        | 2                        | 8.3   | 6.2   | 80      | 3.6   | 3.7   | 18.7                              |
| Moderate                                                                                                                   | 4                        | 16.7  | 15.6  | 260     | 11.6  | 11.9  | 17.4                              |
| Middle                                                                                                                     | 9                        | 37.5  | 26.2  | 817     | 36.5  | 22.9  | 22.1                              |
| Upper                                                                                                                      | 8                        | 33.3  | 50.2  | 1,024   | 45.7  | 59.2  | 41.8                              |
| Unknown                                                                                                                    | 1                        | 4.2   | 1.8   | 60      | 2.7   | 2.2   | 0.0                               |
| Total                                                                                                                      | 24                       | 100.0 | 100.0 | 2,241   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                  |                          |       |       |         |       |       |                                   |
| Low                                                                                                                        | 9                        | 7.0   | 6.3   | 1,093   | 4.6   | 3.6   | 18.7                              |
| Moderate                                                                                                                   | 28                       | 21.7  | 20.7  | 3,431   | 14.5  | 15.4  | 17.4                              |
| Middle                                                                                                                     | 37                       | 28.7  | 24.0  | 5,729   | 24.1  | 21.0  | 22.1                              |
| Upper                                                                                                                      | 44                       | 34.1  | 39.5  | 11,347  | 47.8  | 50.6  | 41.8                              |
| Unknown                                                                                                                    | 11                       | 8.5   | 9.4   | 2,123   | 8.9   | 9.5   | 0.0                               |
| Total                                                                                                                      | 129                      | 100.0 | 100.0 | 23,723  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                             |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                    |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                             |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                  |                          |       |       |         |       |       |                                   |

Table D96B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Grand Rapids-Kentwood Metropolitan                                  |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 6.7   | 0       | 0.0   | 3.5   | 18.7                              |
| Moderate                                                                                                                                                    | 3                        | 16.7  | 17.1  | 169     | 5.7   | 11.7  | 17.4                              |
| Middle                                                                                                                                                      | 5                        | 27.8  | 23.4  | 679     | 23.0  | 18.1  | 22.1                              |
| Upper                                                                                                                                                       | 8                        | 44.4  | 49.7  | 1,502   | 50.8  | 63.8  | 41.8                              |
| Unknown                                                                                                                                                     | 2                        | 11.1  | 3.1   | 604     | 20.4  | 2.9   | 0.0                               |
| Total                                                                                                                                                       | 18                       | 100.0 | 100.0 | 2,954   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 8.5   | 0       | 0.0   | 5.5   | 18.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 19.7  | 0       | 0.0   | 13.0  | 17.4                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 25.9  | 0       | 0.0   | 18.7  | 22.1                              |
| Upper                                                                                                                                                       | 1                        | 100.0 | 42.0  | 400     | 100.0 | 60.5  | 41.8                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 3.8   | 0       | 0.0   | 2.3   | 0.0                               |
| Total                                                                                                                                                       | 1                        | 100.0 | 100.0 | 400     | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.8   | 0       | 0.0   | 0.7   | 18.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 1.3   | 0       | 0.0   | 1.1   | 17.4                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.7   | 22.1                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.8                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 97.2  | 0       | 0.0   | 97.6  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |



Table D97

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Grand Rapids-Kentwood Metropolitan                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 69                               | 31.7  | 44.3  | 8,037   | 13.7  | 23.9  | 39   | 22.4  | 48.1  | 7,422   | 13.6  | 24.4  | 88.6                     |
| Over \$1 Million                                                                   | 117                              | 53.7  |       | 46,755  | 79.8  |       | 128  | 73.6  |       | 45,227  | 83.2  |       | 10.5                     |
| Revenue Unknown                                                                    | 32                               | 14.7  |       | 3,785   | 6.5   |       | 7    | 4.0   |       | 1,725   | 3.2   |       | 0.8                      |
| Total                                                                              | 218                              | 100.0 |       | 58,577  | 100.0 |       | 174  | 100.0 |       | 54,374  | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 109                              | 50.0  | 84.4  | 5,467   | 9.3   | 21.7  | 77   | 44.3  | 88.3  | 4,392   | 8.1   | 23.4  |                          |
| \$100,001 - \$250,000                                                              | 28                               | 12.8  | 7.7   | 5,078   | 8.7   | 18.1  | 28   | 16.1  | 5.4   | 5,169   | 9.5   | 16.0  |                          |
| \$250,001 - \$1 Million                                                            | 81                               | 37.2  | 7.9   | 48,032  | 82.0  | 60.2  | 69   | 39.7  | 6.4   | 44,813  | 82.4  | 60.7  |                          |
| Total                                                                              | 218                              | 100.0 | 100.0 | 58,577  | 100.0 | 100.0 | 174  | 100.0 | 100.0 | 54,374  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 53                               | 76.8  |       | 2,429   | 30.2  |       | 28   | 71.8  |       | 1,568   | 21.1  |       |                          |
| \$100,001 - \$250,000                                                              | 6                                | 8.7   |       | 993     | 12.4  |       | 4    | 10.3  |       | 721     | 9.7   |       |                          |
| \$250,001 - \$1 Million                                                            | 10                               | 14.5  |       | 4,615   | 57.4  |       | 7    | 17.9  |       | 5,133   | 69.2  |       |                          |
| Total                                                                              | 69                               | 100.0 |       | 8,037   | 100.0 |       | 39   | 100.0 |       | 7,422   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D98

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Grand Rapids-Kentwood Metropolitan                       |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 129                      | 41.0  | 35.8  | 9,250   | 12.9  | 19.5  | 88.5                     |
| Over \$1 Million                                                          | 146                      | 46.3  |       | 57,119  | 79.6  |       | 10.7                     |
| Revenue Unknown                                                           | 40                       | 12.7  |       | 5,386   | 7.5   |       | 0.7                      |
| Total                                                                     | 315                      | 100.0 |       | 71,755  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 176                      | 55.9  | 77.4  | 7,551   | 10.5  | 19.9  |                          |
| \$100,001 - \$250,000                                                     | 49                       | 15.6  | 11.8  | 8,533   | 11.9  | 20.4  |                          |
| \$250,001 - \$1 Million                                                   | 90                       | 28.6  | 10.8  | 55,671  | 77.6  | 59.7  |                          |
| Total                                                                     | 315                      | 100.0 | 100.0 | 71,755  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 109                      | 84.5  |       | 4,193   | 45.3  |       |                          |
| \$100,001 - \$250,000                                                     | 15                       | 11.6  |       | 2,394   | 25.9  |       |                          |
| \$250,001 - \$1 Million                                                   | 5                        | 3.9   |       | 2,663   | 28.8  |       |                          |
| Total                                                                     | 129                      | 100.0 |       | 9,250   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table D99

| 2022 Combined Demographics<br>Assessment Area: Jackson MSA                                                              |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 3                         | 6.5                   | 1,363                              | 3.4          | 588                                                | 43.1         | 7,477                     | 18.7         |
| Moderate                                                                                                                | 14                        | 30.4                  | 10,314                             | 25.8         | 1,558                                              | 15.1         | 7,599                     | 19.0         |
| Middle                                                                                                                  | 15                        | 32.6                  | 16,650                             | 41.7         | 898                                                | 5.4          | 8,365                     | 21.0         |
| Upper                                                                                                                   | 12                        | 26.1                  | 11,451                             | 28.7         | 343                                                | 3.0          | 16,467                    | 41.3         |
| Unknown                                                                                                                 | 2                         | 4.3                   | 130                                | 0.3          | 41                                                 | 31.5         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>46</b>                 | <b>100.0</b>          | <b>39,908</b>                      | <b>100.0</b> | <b>3,428</b>                                       | <b>8.6</b>   | <b>39,908</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 3,196                     | 814                   | 1.8                                | 25.5         | 1,810                                              | 56.6         | 572                       | 17.9         |
| Moderate                                                                                                                | 20,487                    | 10,871                | 23.5                               | 53.1         | 7,666                                              | 37.4         | 1,950                     | 9.5          |
| Middle                                                                                                                  | 26,856                    | 19,868                | 43.0                               | 74.0         | 4,636                                              | 17.3         | 2,352                     | 8.8          |
| Upper                                                                                                                   | 18,320                    | 14,638                | 31.7                               | 79.9         | 1,325                                              | 7.2          | 2,357                     | 12.9         |
| Unknown                                                                                                                 | 860                       | 40                    | 0.1                                | 4.7          | 548                                                | 63.7         | 272                       | 31.6         |
| <b>Total AA</b>                                                                                                         | <b>69,719</b>             | <b>46,231</b>         | <b>100.0</b>                       | <b>66.3</b>  | <b>15,985</b>                                      | <b>22.9</b>  | <b>7,503</b>              | <b>10.8</b>  |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 172                       | 3.2                   | 144                                | 3.0          | 27                                                 | 5.0          | 1                         | 1.8          |
| Moderate                                                                                                                | 1,666                     | 30.8                  | 1,424                              | 29.5         | 236                                                | 44.1         | 6                         | 10.7         |
| Middle                                                                                                                  | 2,038                     | 37.6                  | 1,855                              | 38.5         | 155                                                | 29.0         | 28                        | 50.0         |
| Upper                                                                                                                   | 1,226                     | 22.6                  | 1,138                              | 23.6         | 71                                                 | 13.3         | 17                        | 30.4         |
| Unknown                                                                                                                 | 313                       | 5.8                   | 263                                | 5.5          | 46                                                 | 8.6          | 4                         | 7.1          |
| <b>Total AA</b>                                                                                                         | <b>5,415</b>              | <b>100.0</b>          | <b>4,824</b>                       | <b>100.0</b> | <b>535</b>                                         | <b>100.0</b> | <b>56</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 89.1         |                                                    | 9.9          |                           | 1.0          |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 1                         | 0.5                   | 1                                  | 0.5          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 7                         | 3.6                   | 7                                  | 3.6          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                  | 118                       | 60.2                  | 116                                | 60.1         | 2                                                  | 66.7         | 0                         | 0.0          |
| Upper                                                                                                                   | 69                        | 35.2                  | 68                                 | 35.2         | 1                                                  | 33.3         | 0                         | 0.0          |
| Unknown                                                                                                                 | 1                         | 0.5                   | 1                                  | 0.5          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>196</b>                | <b>100.0</b>          | <b>193</b>                         | <b>100.0</b> | <b>3</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 98.5         |                                                    | 1.5          |                           | 0.0          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

Table D100

| 2021 Combined Demographics<br>Assessment Area: Jackson MSA                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 6                         | 15.8                  | 3,504                              | 8.8       | 1,654                                              | 47.2      | 8,910                     | 22.3      |
| Moderate                                                                                                                | 9                         | 23.7                  | 7,028                              | 17.6      | 1,361                                              | 19.4      | 6,996                     | 17.5      |
| Middle                                                                                                                  | 14                        | 36.8                  | 20,124                             | 50.4      | 1,772                                              | 8.8       | 8,057                     | 20.2      |
| Upper                                                                                                                   | 8                         | 21.1                  | 9,274                              | 23.2      | 371                                                | 4.0       | 15,967                    | 40.0      |
| Unknown                                                                                                                 | 1                         | 2.6                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 38                        | 100.0                 | 39,930                             | 100.0     | 5,158                                              | 12.9      | 39,930                    | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 6,780                     | 2,485                 | 5.7                                | 36.7      | 3,214                                              | 47.4      | 1,081                     | 15.9      |
| Moderate                                                                                                                | 14,319                    | 6,790                 | 15.6                               | 47.4      | 5,487                                              | 38.3      | 2,042                     | 14.3      |
| Middle                                                                                                                  | 32,454                    | 23,375                | 53.7                               | 72.0      | 5,948                                              | 18.3      | 3,131                     | 9.6       |
| Upper                                                                                                                   | 15,568                    | 10,905                | 25.0                               | 70.0      | 2,387                                              | 15.3      | 2,276                     | 14.6      |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 69,121                    | 43,555                | 100.0                              | 63.0      | 17,036                                             | 24.6      | 8,530                     | 12.3      |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 535                       | 9.9                   | 430                                | 8.9       | 99                                                 | 18.4      | 6                         | 10.5      |
| Moderate                                                                                                                | 1,543                     | 28.4                  | 1,330                              | 27.5      | 204                                                | 38.0      | 9                         | 15.8      |
| Middle                                                                                                                  | 2,224                     | 41.0                  | 2,035                              | 42.1      | 159                                                | 29.6      | 30                        | 52.6      |
| Upper                                                                                                                   | 1,119                     | 20.6                  | 1,032                              | 21.4      | 75                                                 | 14.0      | 12                        | 21.1      |
| Unknown                                                                                                                 | 4                         | 0.1                   | 4                                  | 0.1       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 5,425                     | 100.0                 | 4,831                              | 100.0     | 537                                                | 100.0     | 57                        | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       | 89.1                               |           | 9.9                                                |           | 1.1                       |           |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 2                         | 1.0                   | 2                                  | 1.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 7                         | 3.4                   | 7                                  | 3.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                  | 139                       | 67.5                  | 136                                | 67.3      | 3                                                  | 75.0      | 0                         | 0.0       |
| Upper                                                                                                                   | 58                        | 28.2                  | 57                                 | 28.2      | 1                                                  | 25.0      | 0                         | 0.0       |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 206                       | 100.0                 | 202                                | 100.0     | 4                                                  | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                              |                           |                       | 98.1                               |           | 1.9                                                |           | 0.0                       |           |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table D101

| 2020 Combined Demographics<br>Assessment Area: Jackson MSA                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 6                         | 15.8                  | 3,504                              | 8.8       | 1,654                                              | 47.2      | 8,910                     | 22.3      |
| Moderate                                                                                                                | 9                         | 23.7                  | 7,028                              | 17.6      | 1,361                                              | 19.4      | 6,996                     | 17.5      |
| Middle                                                                                                                  | 14                        | 36.8                  | 20,124                             | 50.4      | 1,772                                              | 8.8       | 8,057                     | 20.2      |
| Upper                                                                                                                   | 8                         | 21.1                  | 9,274                              | 23.2      | 371                                                | 4.0       | 15,967                    | 40.0      |
| Unknown                                                                                                                 | 1                         | 2.6                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 38                        | 100.0                 | 39,930                             | 100.0     | 5,158                                              | 12.9      | 39,930                    | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 6,780                     | 2,485                 | 5.7                                | 36.7      | 3,214                                              | 47.4      | 1,081                     | 15.9      |
| Moderate                                                                                                                | 14,319                    | 6,790                 | 15.6                               | 47.4      | 5,487                                              | 38.3      | 2,042                     | 14.3      |
| Middle                                                                                                                  | 32,454                    | 23,375                | 53.7                               | 72.0      | 5,948                                              | 18.3      | 3,131                     | 9.6       |
| Upper                                                                                                                   | 15,568                    | 10,905                | 25.0                               | 70.0      | 2,387                                              | 15.3      | 2,276                     | 14.6      |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 69,121                    | 43,555                | 100.0                              | 63.0      | 17,036                                             | 24.6      | 8,530                     | 12.3      |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 548                       | 9.9                   | 442                                | 8.9       | 102                                                | 18.6      | 4                         | 7.5       |
| Moderate                                                                                                                | 1,561                     | 28.2                  | 1,339                              | 27.1      | 213                                                | 38.9      | 9                         | 17.0      |
| Middle                                                                                                                  | 2,270                     | 41.0                  | 2,083                              | 42.1      | 158                                                | 28.9      | 29                        | 54.7      |
| Upper                                                                                                                   | 1,160                     | 20.9                  | 1,075                              | 21.7      | 74                                                 | 13.5      | 11                        | 20.8      |
| Unknown                                                                                                                 | 4                         | 0.1                   | 4                                  | 0.1       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 5,543                     | 100.0                 | 4,943                              | 100.0     | 547                                                | 100.0     | 53                        | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 89.2      |                                                    | 9.9       |                           | 1.0       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 2                         | 1.0                   | 2                                  | 1.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 7                         | 3.4                   | 7                                  | 3.4       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                  | 143                       | 68.8                  | 140                                | 68.6      | 3                                                  | 75.0      | 0                         | 0.0       |
| Upper                                                                                                                   | 56                        | 26.9                  | 55                                 | 27.0      | 1                                                  | 25.0      | 0                         | 0.0       |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 208                       | 100.0                 | 204                                | 100.0     | 4                                                  | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 98.1      |                                                    | 1.9       |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table D102A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Jackson MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 3                                | 23.1  | 5.3   | 218     | 14.2  | 2.5   | 0    | 0.0   | 2.0   | 0       | 0.0   | 1.0   | 1.8                          |
| Moderate                                                                                                         | 2                                | 15.4  | 18.8  | 134     | 8.7   | 13.1  | 6    | 42.9  | 29.7  | 700     | 30.6  | 20.6  | 23.5                         |
| Middle                                                                                                           | 4                                | 30.8  | 51.5  | 357     | 23.2  | 53.2  | 6    | 42.9  | 41.8  | 1,121   | 49.0  | 43.4  | 43.0                         |
| Upper                                                                                                            | 4                                | 30.8  | 24.4  | 830     | 53.9  | 31.2  | 1    | 7.1   | 26.2  | 113     | 4.9   | 34.8  | 31.7                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1    | 7.1   | 0.3   | 352     | 15.4  | 0.2   | 0.1                          |
| Total                                                                                                            | 13                               | 100.0 | 100.0 | 1,539   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 2,286   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 3                                | 5.8   | 1.7   | 171     | 2.6   | 0.8   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.4   | 1.8                          |
| Moderate                                                                                                         | 5                                | 9.6   | 12.4  | 543     | 8.3   | 8.7   | 6    | 24.0  | 19.5  | 492     | 14.5  | 13.6  | 23.5                         |
| Middle                                                                                                           | 26                               | 50.0  | 54.5  | 3,365   | 51.6  | 54.6  | 10   | 40.0  | 44.2  | 1,018   | 30.0  | 44.3  | 43.0                         |
| Upper                                                                                                            | 18                               | 34.6  | 31.4  | 2,447   | 37.5  | 35.9  | 9    | 36.0  | 35.2  | 1,887   | 55.5  | 41.5  | 31.7                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                            | 52                               | 100.0 | 100.0 | 6,526   | 100.0 | 100.0 | 25   | 100.0 | 100.0 | 3,397   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 0                                | 0.0   | 2.4   | 0       | 0.0   | 2.1   | 0    | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 1.8                          |
| Moderate                                                                                                         | 4                                | 10.8  | 12.7  | 250     | 10.3  | 6.6   | 7    | 26.9  | 17.5  | 223     | 10.7  | 12.6  | 23.5                         |
| Middle                                                                                                           | 19                               | 51.4  | 52.2  | 1,444   | 59.4  | 48.9  | 12   | 46.2  | 48.4  | 1,413   | 67.6  | 48.3  | 43.0                         |
| Upper                                                                                                            | 14                               | 37.8  | 32.7  | 736     | 30.3  | 42.4  | 7    | 26.9  | 33.4  | 453     | 21.7  | 38.4  | 31.7                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                            | 37                               | 100.0 | 100.0 | 2,430   | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 2,089   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                              | 0                                | 0.0   | 26.7  | 0       | 0.0   | 33.2  | 0    | 0.0   | 20.0  | 0       | 0.0   | 57.2  | 8.3                          |
| Moderate                                                                                                         | 0                                | 0.0   | 33.3  | 0       | 0.0   | 19.9  | 0    | 0.0   | 50.0  | 0       | 0.0   | 40.6  | 60.9                         |
| Middle                                                                                                           | 1                                | 100.0 | 26.7  | 141     | 100.0 | 33.6  | 0    | 0.0   | 20.0  | 0       | 0.0   | 1.2   | 22.3                         |
| Upper                                                                                                            | 0                                | 0.0   | 13.3  | 0       | 0.0   | 13.3  | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.6                          |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 10.0  | 0       | 0.0   | 1.0   | 6.9                          |
| Total                                                                                                            | 1                                | 100.0 | 100.0 | 141     | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                              | 7                                | 5.7   | 3.2   | 427     | 3.5   | 2.5   | 0    | 0.0   | 1.5   | 0       | 0.0   | 3.2   | 1.8                          |
| Moderate                                                                                                         | 14                               | 11.4  | 15.0  | 1,220   | 10.0  | 10.9  | 21   | 26.6  | 24.7  | 1,533   | 17.0  | 18.9  | 23.5                         |
| Middle                                                                                                           | 61                               | 49.6  | 53.2  | 6,037   | 49.3  | 53.3  | 35   | 44.3  | 43.4  | 4,360   | 48.3  | 42.0  | 43.0                         |
| Upper                                                                                                            | 41                               | 33.3  | 28.6  | 4,558   | 37.2  | 33.2  | 22   | 27.8  | 30.1  | 2,776   | 30.8  | 35.7  | 31.7                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1    | 1.3   | 0.3   | 352     | 3.9   | 0.2   | 0.1                          |
| Total                                                                                                            | 123                              | 100.0 | 100.0 | 12,242  | 100.0 | 100.0 | 79   | 100.0 | 100.0 | 9,021   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D102B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Jackson MSA                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 1                                | 5.0   | 1.1   | 38      | 2.4   | 0.4   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.8                          |
| Moderate                                                                                                                                                    | 3                                | 15.0  | 11.6  | 293     | 18.2  | 10.6  | 2    | 14.3  | 17.6  | 118     | 9.4   | 14.6  | 23.5                         |
| Middle                                                                                                                                                      | 11                               | 55.0  | 54.7  | 730     | 45.5  | 52.8  | 7    | 50.0  | 44.4  | 808     | 64.7  | 38.1  | 43.0                         |
| Upper                                                                                                                                                       | 5                                | 25.0  | 32.6  | 545     | 33.9  | 36.1  | 5    | 35.7  | 37.9  | 323     | 25.9  | 47.2  | 31.7                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 20                               | 100.0 | 100.0 | 1,606   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,249   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.9   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.2   | 1.8                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 15.9  | 0       | 0.0   | 11.4  | 0    | 0.0   | 15.3  | 0       | 0.0   | 9.8   | 23.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 53.3  | 0       | 0.0   | 57.6  | 0    | 0.0   | 53.5  | 0       | 0.0   | 47.6  | 43.0                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 29.9  | 0       | 0.0   | 30.5  | 0    | 0.0   | 29.9  | 0       | 0.0   | 41.8  | 31.7                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.6   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 10.6  | 0       | 0.0   | 6.1   | 0    | 0.0   | 3.2   | 0       | 0.0   | 1.3   | 1.8                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 12.8  | 0       | 0.0   | 8.0   | 0    | 0.0   | 25.8  | 0       | 0.0   | 26.4  | 23.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 57.4  | 0       | 0.0   | 59.7  | 0    | 0.0   | 35.5  | 0       | 0.0   | 39.0  | 43.0                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 19.1  | 0       | 0.0   | 26.2  | 0    | 0.0   | 35.5  | 0       | 0.0   | 33.3  | 31.7                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D103A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Jackson MSA                                            |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.7   | 0       | 0.0   | 2.3   | 5.7                          |
| Moderate                                                                | 0                        | 0.0   | 18.2  | 0       | 0.0   | 12.4  | 15.6                         |
| Middle                                                                  | 5                        | 62.5  | 51.4  | 659     | 59.5  | 53.4  | 53.7                         |
| Upper                                                                   | 3                        | 37.5  | 25.6  | 448     | 40.5  | 31.9  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 8                        | 100.0 | 100.0 | 1,107   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 2.4   | 1.2   | 52      | 0.8   | 0.5   | 5.7                          |
| Moderate                                                                | 9                        | 21.4  | 9.6   | 1,727   | 27.7  | 6.9   | 15.6                         |
| Middle                                                                  | 21                       | 50.0  | 54.0  | 3,110   | 49.8  | 52.7  | 53.7                         |
| Upper                                                                   | 11                       | 26.2  | 35.2  | 1,352   | 21.7  | 39.8  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 42                       | 100.0 | 100.0 | 6,241   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.2   | 0       | 0.0   | 1.8   | 5.7                          |
| Moderate                                                                | 4                        | 18.2  | 12.2  | 202     | 12.1  | 8.2   | 15.6                         |
| Middle                                                                  | 12                       | 54.5  | 59.5  | 818     | 49.0  | 62.8  | 53.7                         |
| Upper                                                                   | 6                        | 27.3  | 25.2  | 649     | 38.9  | 27.2  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 22                       | 100.0 | 100.0 | 1,669   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 40.0  | 0       | 0.0   | 43.6  | 11.2                         |
| Moderate                                                                | 0                        | 0.0   | 20.0  | 0       | 0.0   | 31.5  | 43.9                         |
| Middle                                                                  | 0                        | 0.0   | 20.0  | 0       | 0.0   | 1.2   | 29.0                         |
| Upper                                                                   | 0                        | 0.0   | 20.0  | 0       | 0.0   | 23.7  | 15.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 1                        | 1.1   | 2.7   | 52      | 0.5   | 1.7   | 5.7                          |
| Moderate                                                                | 15                       | 16.5  | 13.4  | 1,999   | 19.3  | 9.5   | 15.6                         |
| Middle                                                                  | 50                       | 54.9  | 53.2  | 5,443   | 52.6  | 52.4  | 53.7                         |
| Upper                                                                   | 25                       | 27.5  | 30.8  | 2,854   | 27.6  | 36.4  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 91                       | 100.0 | 100.0 | 10,348  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D103B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Jackson MSA                                            |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.9   | 0       | 0.0   | 0.1   | 5.7                          |
| Moderate                                                                | 2                        | 10.5  | 13.5  | 70      | 5.3   | 8.6   | 15.6                         |
| Middle                                                                  | 12                       | 63.2  | 53.2  | 856     | 64.3  | 47.6  | 53.7                         |
| Upper                                                                   | 5                        | 26.3  | 32.4  | 405     | 30.4  | 43.7  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 19                       | 100.0 | 100.0 | 1,331   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 5.7                          |
| Moderate                                                                | 0                        | 0.0   | 22.1  | 0       | 0.0   | 16.5  | 15.6                         |
| Middle                                                                  | 0                        | 0.0   | 58.9  | 0       | 0.0   | 58.1  | 53.7                         |
| Upper                                                                   | 0                        | 0.0   | 18.9  | 0       | 0.0   | 25.4  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.6   | 0       | 0.0   | 2.7   | 5.7                          |
| Moderate                                                                | 0                        | 0.0   | 23.8  | 0       | 0.0   | 17.3  | 15.6                         |
| Middle                                                                  | 0                        | 0.0   | 51.7  | 0       | 0.0   | 51.0  | 53.7                         |
| Upper                                                                   | 0                        | 0.0   | 19.9  | 0       | 0.0   | 29.0  | 25.0                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |



**Table D104**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Jackson MSA                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 29                               | 15.8  | 8.9   | 6,696   | 17.1  | 8.7   | 5    | 4.0   | 2.6   | 1,510   | 4.2   | 2.5   | 3.2                      |
| Moderate                                                                                                                                                                                  | 64                               | 34.8  | 26.7  | 13,667  | 35.0  | 38.6  | 63   | 50.4  | 28.5  | 18,217  | 50.3  | 36.7  | 30.8                     |
| Middle                                                                                                                                                                                    | 51                               | 27.7  | 41.7  | 11,896  | 30.4  | 35.6  | 32   | 25.6  | 39.3  | 9,537   | 26.3  | 32.9  | 37.6                     |
| Upper                                                                                                                                                                                     | 40                               | 21.7  | 22.3  | 6,833   | 17.5  | 17.0  | 17   | 13.6  | 24.9  | 5,062   | 14.0  | 19.3  | 22.6                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 8    | 6.4   | 4.0   | 1,875   | 5.2   | 8.3   | 5.8                      |
| Total                                                                                                                                                                                     | 184                              | 100.0 | 100.0 | 39,092  | 100.0 | 100.0 | 125  | 100.0 | 100.0 | 36,201  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D105**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Jackson MSA |                          |       |       |         |       |       |                          |
|----------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                            | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                          | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                      | 39                       | 15.0  | 9.3   | 8,301   | 17.5  | 12.8  | 9.9                      |
| Moderate                                                                                                 | 100                      | 38.5  | 26.9  | 18,004  | 37.8  | 35.3  | 28.2                     |
| Middle                                                                                                   | 70                       | 26.9  | 40.6  | 14,201  | 29.9  | 32.3  | 41.0                     |
| Upper                                                                                                    | 51                       | 19.6  | 22.9  | 7,063   | 14.8  | 19.4  | 20.9                     |
| Unknown                                                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                      |
| Total                                                                                                    | 260                      | 100.0 | 100.0 | 47,569  | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D106A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Jackson MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 2                                | 15.4  | 8.0   | 141     | 9.2   | 4.4   | 1    | 7.1   | 17.1  | 85      | 3.7   | 9.4   | 18.7                              |
| Moderate                                                                                                     | 1                                | 7.7   | 23.6  | 128     | 8.3   | 16.3  | 1    | 7.1   | 26.5  | 113     | 4.9   | 20.4  | 19.0                              |
| Middle                                                                                                       | 5                                | 38.5  | 24.9  | 475     | 30.9  | 23.8  | 6    | 42.9  | 21.7  | 826     | 36.1  | 22.7  | 21.0                              |
| Upper                                                                                                        | 4                                | 30.8  | 29.6  | 487     | 31.6  | 41.8  | 3    | 21.4  | 20.6  | 690     | 30.2  | 33.0  | 41.3                              |
| Unknown                                                                                                      | 1                                | 7.7   | 13.9  | 308     | 20.0  | 13.8  | 3    | 21.4  | 14.1  | 572     | 25.0  | 14.5  | 0.0                               |
| Total                                                                                                        | 13                               | 100.0 | 100.0 | 1,539   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 2,286   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 6                                | 11.5  | 5.6   | 313     | 4.8   | 3.1   | 4    | 16.0  | 17.2  | 420     | 12.4  | 10.6  | 18.7                              |
| Moderate                                                                                                     | 8                                | 15.4  | 16.5  | 735     | 11.3  | 11.8  | 13   | 52.0  | 29.3  | 1,249   | 36.8  | 25.5  | 19.0                              |
| Middle                                                                                                       | 14                               | 26.9  | 22.3  | 1,530   | 23.4  | 20.1  | 3    | 12.0  | 23.5  | 621     | 18.3  | 23.8  | 21.0                              |
| Upper                                                                                                        | 19                               | 36.5  | 39.5  | 3,424   | 52.5  | 48.0  | 3    | 12.0  | 23.5  | 872     | 25.7  | 32.5  | 41.3                              |
| Unknown                                                                                                      | 5                                | 9.6   | 16.0  | 524     | 8.0   | 17.0  | 2    | 8.0   | 6.6   | 235     | 6.9   | 7.6   | 0.0                               |
| Total                                                                                                        | 52                               | 100.0 | 100.0 | 6,526   | 100.0 | 100.0 | 25   | 100.0 | 100.0 | 3,397   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 1                                | 2.7   | 7.2   | 50      | 2.1   | 4.4   | 4    | 15.4  | 15.0  | 338     | 16.2  | 11.2  | 18.7                              |
| Moderate                                                                                                     | 6                                | 16.2  | 19.1  | 261     | 10.7  | 16.3  | 6    | 23.1  | 22.9  | 409     | 19.6  | 20.5  | 19.0                              |
| Middle                                                                                                       | 12                               | 32.4  | 26.7  | 791     | 32.6  | 22.1  | 6    | 23.1  | 28.0  | 320     | 15.3  | 24.1  | 21.0                              |
| Upper                                                                                                        | 14                               | 37.8  | 45.4  | 1,137   | 46.8  | 56.1  | 7    | 26.9  | 32.2  | 924     | 44.2  | 43.3  | 41.3                              |
| Unknown                                                                                                      | 4                                | 10.8  | 1.6   | 191     | 7.9   | 1.1   | 3    | 11.5  | 1.9   | 98      | 4.7   | 1.0   | 0.0                               |
| Total                                                                                                        | 37                               | 100.0 | 100.0 | 2,430   | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 2,089   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 9                                | 7.4   | 6.6   | 504     | 4.2   | 3.7   | 12   | 15.2  | 16.6  | 1,077   | 11.9  | 9.7   | 18.7                              |
| Moderate                                                                                                     | 18                               | 14.8  | 19.3  | 1,179   | 9.7   | 13.8  | 22   | 27.8  | 26.6  | 1,921   | 21.3  | 21.8  | 19.0                              |
| Middle                                                                                                       | 36                               | 29.5  | 23.3  | 3,094   | 25.6  | 21.7  | 20   | 25.3  | 22.8  | 2,259   | 25.0  | 22.9  | 21.0                              |
| Upper                                                                                                        | 48                               | 39.3  | 35.8  | 6,248   | 51.6  | 45.3  | 17   | 21.5  | 23.4  | 2,859   | 31.7  | 33.6  | 41.3                              |
| Unknown                                                                                                      | 11                               | 9.0   | 14.9  | 1,076   | 8.9   | 15.5  | 8    | 10.1  | 10.7  | 905     | 10.0  | 12.0  | 0.0                               |
| Total                                                                                                        | 122                              | 100.0 | 100.0 | 12,101  | 100.0 | 100.0 | 79   | 100.0 | 100.0 | 9,021   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D106B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Jackson MSA                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 10.5  | 0       | 0.0   | 6.9   | 3    | 21.4  | 10.5  | 234     | 18.7  | 5.8   | 18.7                              |
| Moderate                                                                                                                                                    | 3                                | 15.0  | 16.8  | 55      | 3.4   | 12.5  | 2    | 14.3  | 15.0  | 150     | 12.0  | 12.7  | 19.0                              |
| Middle                                                                                                                                                      | 5                                | 25.0  | 18.9  | 298     | 18.6  | 21.4  | 5    | 35.7  | 23.5  | 492     | 39.4  | 20.1  | 21.0                              |
| Upper                                                                                                                                                       | 11                               | 55.0  | 50.5  | 1,200   | 74.7  | 56.3  | 4    | 28.6  | 48.4  | 373     | 29.9  | 59.5  | 41.3                              |
| Unknown                                                                                                                                                     | 1                                | 5.0   | 3.2   | 53      | 3.3   | 2.8   | 0    | 0.0   | 2.6   | 0       | 0.0   | 2.0   | 0.0                               |
| Total                                                                                                                                                       | 20                               | 100.0 | 100.0 | 1,606   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,249   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 6.5   | 0       | 0.0   | 4.8   | 0    | 0.0   | 15.3  | 0       | 0.0   | 10.2  | 18.7                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 17.8  | 0       | 0.0   | 11.4  | 0    | 0.0   | 26.4  | 0       | 0.0   | 21.0  | 19.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 26.2  | 0       | 0.0   | 21.9  | 0    | 0.0   | 26.4  | 0       | 0.0   | 19.0  | 21.0                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 46.7  | 0       | 0.0   | 57.9  | 0    | 0.0   | 27.8  | 0       | 0.0   | 40.6  | 41.3                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 2.8   | 0       | 0.0   | 4.0   | 0    | 0.0   | 4.2   | 0       | 0.0   | 9.1   | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.7                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.0                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.3                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D107A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Jackson MSA                                                                                                                                      |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 11.3  | 0       | 0.0   | 6.1   | 22.3                              |
| Moderate                                                                                                                                                                                                                                 | 1                        | 12.5  | 26.4  | 175     | 15.8  | 20.3  | 17.5                              |
| Middle                                                                                                                                                                                                                                   | 3                        | 37.5  | 23.0  | 359     | 32.4  | 22.3  | 20.2                              |
| Upper                                                                                                                                                                                                                                    | 4                        | 50.0  | 29.6  | 573     | 51.8  | 41.8  | 40.0                              |
| Unknown                                                                                                                                                                                                                                  | 0                        | 0.0   | 9.7   | 0       | 0.0   | 9.5   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 8                        | 100.0 | 100.0 | 1,107   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 9                        | 21.4  | 4.2   | 554     | 8.9   | 2.1   | 22.3                              |
| Moderate                                                                                                                                                                                                                                 | 3                        | 7.1   | 14.3  | 212     | 3.4   | 10.0  | 17.5                              |
| Middle                                                                                                                                                                                                                                   | 9                        | 21.4  | 22.5  | 1,109   | 17.8  | 19.5  | 20.2                              |
| Upper                                                                                                                                                                                                                                    | 19                       | 45.2  | 42.1  | 4,044   | 64.8  | 50.3  | 40.0                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 4.8   | 16.9  | 322     | 5.2   | 18.1  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 42                       | 100.0 | 100.0 | 6,241   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 5                        | 22.7  | 7.7   | 280     | 16.8  | 4.9   | 22.3                              |
| Moderate                                                                                                                                                                                                                                 | 3                        | 13.6  | 17.6  | 274     | 16.4  | 14.8  | 17.5                              |
| Middle                                                                                                                                                                                                                                   | 4                        | 18.2  | 25.2  | 222     | 13.3  | 26.2  | 20.2                              |
| Upper                                                                                                                                                                                                                                    | 10                       | 45.5  | 48.6  | 893     | 53.5  | 52.9  | 40.0                              |
| Unknown                                                                                                                                                                                                                                  | 0                        | 0.0   | 0.9   | 0       | 0.0   | 1.2   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 22                       | 100.0 | 100.0 | 1,669   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 16                       | 17.6  | 6.9   | 889     | 8.6   | 3.6   | 22.3                              |
| Moderate                                                                                                                                                                                                                                 | 10                       | 11.0  | 18.8  | 871     | 8.4   | 13.9  | 17.5                              |
| Middle                                                                                                                                                                                                                                   | 21                       | 23.1  | 22.3  | 2,010   | 19.4  | 20.4  | 20.2                              |
| Upper                                                                                                                                                                                                                                    | 40                       | 44.0  | 37.0  | 6,178   | 59.7  | 46.6  | 40.0                              |
| Unknown                                                                                                                                                                                                                                  | 4                        | 4.4   | 15.1  | 400     | 3.9   | 15.5  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 91                       | 100.0 | 100.0 | 10,348  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table D107B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Jackson MSA                                                         |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                        | 10.5  | 5.4   | 55      | 4.1   | 4.0   | 22.3                              |
| Moderate                                                                                                                                                    | 3                        | 15.8  | 26.1  | 210     | 15.8  | 19.2  | 17.5                              |
| Middle                                                                                                                                                      | 5                        | 26.3  | 20.7  | 320     | 24.0  | 21.9  | 20.2                              |
| Upper                                                                                                                                                       | 7                        | 36.8  | 47.7  | 668     | 50.2  | 54.9  | 40.0                              |
| Unknown                                                                                                                                                     | 2                        | 10.5  | 0.0   | 78      | 5.9   | 0.0   | 0.0                               |
| Total                                                                                                                                                       | 19                       | 100.0 | 100.0 | 1,331   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 7.4   | 0       | 0.0   | 4.3   | 22.3                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 18.9  | 0       | 0.0   | 11.7  | 17.5                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 23.2  | 0       | 0.0   | 23.1  | 20.2                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 46.3  | 0       | 0.0   | 54.2  | 40.0                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 4.2   | 0       | 0.0   | 6.7   | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 22.3                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.5                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.2                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.0                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table D108**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|--------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Jackson MSA                                                                                            |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |        |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | 2021                             |       |       |         |       |       | 2022   |       |       |         |       |       |                          |
|                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank   |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                                | #%    | #%    | \$(000) | %     | %     | #      | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                                                              |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 66                               | 35.9  | 45.6  | 9,771   | 25.0  | 27.5  | 46     | 36.8  | 49.7  | 11,285  | 31.2  | 28.7  | 89.1                     |
| Over \$1 Million                                                                                                        | 81                               | 44.0  |       | 24,649  | 63.1  |       | 61     | 48.8  |       | 20,544  | 56.7  |       | 9.9                      |
| Revenue Unknown                                                                                                         | 37                               | 20.1  |       | 4,672   | 12.0  |       | 18     | 14.4  |       | 4,372   | 12.1  |       | 1.0                      |
| Total                                                                                                                   | 184                              | 100.0 |       | 39,092  | 100.0 |       | 125    | 100.0 |       | 36,201  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 77                               | 41.8  | 92.7  | 4,556   | 11.7  | 34.4  | 40     | 32.0  | 96.1  | 2,954   | 8.2   | 48.1  |                          |
| \$100,001 -                                                                                                             | 56                               | 30.4  | 4.1   | 9,610   | 24.6  | 17.8  | 31     | 24.8  | 1.8   | 6,057   | 16.7  | 11.3  |                          |
| \$250,001 - \$1                                                                                                         | 51                               | 27.7  | 3.2   | 24,926  | 63.8  | 47.9  | 54     | 43.2  | 2.1   | 27,190  | 75.1  | 40.7  |                          |
| Total                                                                                                                   | 184                              | 100.0 | 100.0 | 39,092  | 100.0 | 100.0 | 125    | 100.0 | 100.0 | 36,201  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 39                               | 59.1  |       | 2,317   | 23.7  |       | 17     | 37.0  |       | 1,133   | 10.0  |       |                          |
| \$100,001 -                                                                                                             | 17                               | 25.8  |       | 2,789   | 28.5  |       | 13     | 28.3  |       | 2,467   | 21.9  |       |                          |
| \$250,001 - \$1                                                                                                         | 10                               | 15.2  | 4,665 | 47.7    | 16    | 34.8  | 7,685  | 68.1  |       |         |       |       |                          |
| Total                                                                                                                   | 66                               | 100.0 | 9,771 | 100.0   | 46    | 100.0 | 11,285 | 100.0 |       |         |       |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                                  |       |       |         |       |       |        |       |       |         |       |       |                          |

**Table D109**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Jackson MSA                                              |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 116                      | 44.6  | 42.1  | 11,718  | 24.6  | 24.6  | 89.2                     |
| Over \$1 Million                                                          | 110                      | 42.3  |       | 31,692  | 66.6  |       | 9.9                      |
| Revenue Unknown                                                           | 34                       | 13.1  |       | 4,159   | 8.7   |       | 1.0                      |
| Total                                                                     | 260                      | 100.0 |       | 47,569  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 139                      | 53.5  | 88.3  | 6,498   | 13.7  | 29.8  |                          |
| \$100,001 - \$250,000                                                     | 64                       | 24.6  | 6.4   | 11,257  | 23.7  | 19.9  |                          |
| \$250,001 - \$1 Million                                                   | 57                       | 21.9  | 5.3   | 29,814  | 62.7  | 50.3  |                          |
| Total                                                                     | 260                      | 100.0 | 100.0 | 47,569  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 85                       | 73.3  |       | 3,524   | 30.1  |       |                          |
| \$100,001 - \$250,000                                                     | 21                       | 18.1  |       | 3,346   | 28.6  |       |                          |
| \$250,001 - \$1 Million                                                   | 10                       | 8.6   |       | 4,848   | 41.4  |       |                          |
| Total                                                                     | 116                      | 100.0 |       | 11,718  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table D110

| 2022 Combined Demographics<br>Assessment Area: Kalamazoo-Portage MSA                                                                                                                      |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 6                         | 8.8                   | 3,425                              | 5.5          | 927                                                | 27.1         | 13,444                    | 21.5         |
| Moderate                                                                                                                                                                                  | 17                        | 25.0                  | 13,119                             | 20.9         | 1,918                                              | 14.6         | 11,488                    | 18.3         |
| Middle                                                                                                                                                                                    | 23                        | 33.8                  | 24,426                             | 39.0         | 1,307                                              | 5.4          | 12,327                    | 19.7         |
| Upper                                                                                                                                                                                     | 21                        | 30.9                  | 21,569                             | 34.4         | 986                                                | 4.6          | 25,405                    | 40.5         |
| Unknown                                                                                                                                                                                   | 1                         | 1.5                   | 125                                | 0.2          | 79                                                 | 63.2         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>68</b>                 | <b>100.0</b>          | <b>62,664</b>                      | <b>100.0</b> | <b>5,217</b>                                       | <b>8.3</b>   | <b>62,664</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 7,630                     | 1,880                 | 2.8                                | 24.6         | 4,427                                              | 58.0         | 1,323                     | 17.3         |
| Moderate                                                                                                                                                                                  | 26,160                    | 12,400                | 18.4                               | 47.4         | 11,618                                             | 44.4         | 2,142                     | 8.2          |
| Middle                                                                                                                                                                                    | 44,697                    | 28,681                | 42.6                               | 64.2         | 13,362                                             | 29.9         | 2,654                     | 5.9          |
| Upper                                                                                                                                                                                     | 32,329                    | 24,212                | 36.0                               | 74.9         | 6,246                                              | 19.3         | 1,871                     | 5.8          |
| Unknown                                                                                                                                                                                   | 1,769                     | 82                    | 0.1                                | 4.6          | 1,370                                              | 77.4         | 317                       | 17.9         |
| <b>Total AA</b>                                                                                                                                                                           | <b>112,585</b>            | <b>67,255</b>         | <b>100.0</b>                       | <b>59.7</b>  | <b>37,023</b>                                      | <b>32.9</b>  | <b>8,307</b>              | <b>7.4</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 624                       | 6.4                   | 532                                | 6.1          | 90                                                 | 9.7          | 2                         | 2.6          |
| Moderate                                                                                                                                                                                  | 1,816                     | 18.7                  | 1,635                              | 18.8         | 167                                                | 18.0         | 14                        | 18.4         |
| Middle                                                                                                                                                                                    | 4,013                     | 41.3                  | 3,599                              | 41.3         | 384                                                | 41.4         | 30                        | 39.5         |
| Upper                                                                                                                                                                                     | 3,216                     | 33.1                  | 2,900                              | 33.3         | 286                                                | 30.8         | 30                        | 39.5         |
| Unknown                                                                                                                                                                                   | 39                        | 0.4                   | 38                                 | 0.4          | 1                                                  | 0.1          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>9,708</b>              | <b>100.0</b>          | <b>8,704</b>                       | <b>100.0</b> | <b>928</b>                                         | <b>100.0</b> | <b>76</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 89.7         |                                                    | 9.6          |                           | 0.8          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 2                         | 0.9                   | 2                                  | 1.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 30                        | 14.1                  | 24                                 | 12.4         | 6                                                  | 30.0         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 103                       | 48.4                  | 96                                 | 49.7         | 7                                                  | 35.0         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 78                        | 36.6                  | 71                                 | 36.8         | 7                                                  | 35.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>213</b>                | <b>100.0</b>          | <b>193</b>                         | <b>100.0</b> | <b>20</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 90.6         |                                                    | 9.4          |                           | 0.0          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D111

| 2021 Combined Demographics                                     |                           |                       |                                    |           |                                                    |           |                           |           |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Kalamazoo-Portage MSA                         |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 7                         | 12.3                  | 4,549                              | 7.5       | 1,812                                              | 39.8      | 13,136                    | 21.7      |
| Moderate                                                       | 11                        | 19.3                  | 7,582                              | 12.5      | 1,342                                              | 17.7      | 10,337                    | 17.1      |
| Middle                                                         | 24                        | 42.1                  | 29,446                             | 48.7      | 2,718                                              | 9.2       | 12,245                    | 20.3      |
| Upper                                                          | 14                        | 24.6                  | 18,759                             | 31.0      | 823                                                | 4.4       | 24,720                    | 40.9      |
| Unknown                                                        | 1                         | 1.8                   | 102                                | 0.2       | 51                                                 | 50.0      | 0                         | 0.0       |
| Total AA                                                       | 57                        | 100.0                 | 60,438                             | 100.0     | 6,746                                              | 11.2      | 60,438                    | 100.0     |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                            | 12,207                    | 3,153                 | 4.9                                | 25.8      | 6,969                                              | 57.1      | 2,085                     | 17.1      |
| Moderate                                                       | 17,169                    | 7,111                 | 11.1                               | 41.4      | 8,159                                              | 47.5      | 1,899                     | 11.1      |
| Middle                                                         | 52,290                    | 32,604                | 50.7                               | 62.4      | 15,645                                             | 29.9      | 4,041                     | 7.7       |
| Upper                                                          | 28,119                    | 21,384                | 33.3                               | 76.0      | 4,973                                              | 17.7      | 1,762                     | 6.3       |
| Unknown                                                        | 411                       | 50                    | 0.1                                | 12.2      | 293                                                | 71.3      | 68                        | 16.5      |
| Total AA                                                       | 110,196                   | 64,302                | 100.0                              | 58.4      | 36,039                                             | 32.7      | 9,855                     | 8.9       |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 795                       | 8.2                   | 688                                | 7.9       | 106                                                | 11.2      | 1                         | 1.4       |
| Moderate                                                       | 1,989                     | 20.5                  | 1,688                              | 19.4      | 285                                                | 30.2      | 16                        | 21.6      |
| Middle                                                         | 4,460                     | 45.9                  | 4,034                              | 46.4      | 394                                                | 41.7      | 32                        | 43.2      |
| Upper                                                          | 2,418                     | 24.9                  | 2,238                              | 25.8      | 155                                                | 16.4      | 25                        | 33.8      |
| Unknown                                                        | 46                        | 0.5                   | 41                                 | 0.5       | 5                                                  | 0.5       | 0                         | 0.0       |
| Total AA                                                       | 9,708                     | 100.0                 | 8,689                              | 100.0     | 945                                                | 100.0     | 74                        | 100.0     |
| Percentage of Total Businesses:                                |                           |                       |                                    | 89.5      |                                                    | 9.7       |                           | 0.8       |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 1                         | 0.5                   | 1                                  | 0.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                       | 26                        | 12.1                  | 19                                 | 9.8       | 7                                                  | 35.0      | 0                         | 0.0       |
| Middle                                                         | 126                       | 58.9                  | 115                                | 59.6      | 10                                                 | 50.0      | 1                         | 100.0     |
| Upper                                                          | 61                        | 28.5                  | 58                                 | 30.1      | 3                                                  | 15.0      | 0                         | 0.0       |
| Unknown                                                        | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                       | 214                       | 100.0                 | 193                                | 100.0     | 20                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                     |                           |                       |                                    | 90.2      |                                                    | 9.3       |                           | 0.5       |
| Source: 2021 FFIEC Census Data                                 |                           |                       |                                    |           |                                                    |           |                           |           |
| 2021 Dun & Bradstreet Data                                     |                           |                       |                                    |           |                                                    |           |                           |           |
| 2011-2015 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |



Table D112

| 2020 Combined Demographics<br>Assessment Area: Kalamazoo-Portage MSA                                                                                                                      |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 7                         | 12.3                  | 4,549                              | 7.5          | 1,812                                              | 39.8         | 13,136                    | 21.7         |
| Moderate                                                                                                                                                                                  | 11                        | 19.3                  | 7,582                              | 12.5         | 1,342                                              | 17.7         | 10,337                    | 17.1         |
| Middle                                                                                                                                                                                    | 24                        | 42.1                  | 29,446                             | 48.7         | 2,718                                              | 9.2          | 12,245                    | 20.3         |
| Upper                                                                                                                                                                                     | 14                        | 24.6                  | 18,759                             | 31.0         | 823                                                | 4.4          | 24,720                    | 40.9         |
| Unknown                                                                                                                                                                                   | 1                         | 1.8                   | 102                                | 0.2          | 51                                                 | 50.0         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>57</b>                 | <b>100.0</b>          | <b>60,438</b>                      | <b>100.0</b> | <b>6,746</b>                                       | <b>11.2</b>  | <b>60,438</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 12,207                    | 3,153                 | 4.9                                | 25.8         | 6,969                                              | 57.1         | 2,085                     | 17.1         |
| Moderate                                                                                                                                                                                  | 17,169                    | 7,111                 | 11.1                               | 41.4         | 8,159                                              | 47.5         | 1,899                     | 11.1         |
| Middle                                                                                                                                                                                    | 52,290                    | 32,604                | 50.7                               | 62.4         | 15,645                                             | 29.9         | 4,041                     | 7.7          |
| Upper                                                                                                                                                                                     | 28,119                    | 21,384                | 33.3                               | 76.0         | 4,973                                              | 17.7         | 1,762                     | 6.3          |
| Unknown                                                                                                                                                                                   | 411                       | 50                    | 0.1                                | 12.2         | 293                                                | 71.3         | 68                        | 16.5         |
| <b>Total AA</b>                                                                                                                                                                           | <b>110,196</b>            | <b>64,302</b>         | <b>100.0</b>                       | <b>58.4</b>  | <b>36,039</b>                                      | <b>32.7</b>  | <b>9,855</b>              | <b>8.9</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 793                       | 8.0                   | 681                                | 7.7          | 111                                                | 11.5         | 1                         | 1.4          |
| Moderate                                                                                                                                                                                  | 2,014                     | 20.3                  | 1,717                              | 19.3         | 281                                                | 29.0         | 16                        | 22.2         |
| Middle                                                                                                                                                                                    | 4,572                     | 46.1                  | 4,122                              | 46.4         | 421                                                | 43.4         | 29                        | 40.3         |
| Upper                                                                                                                                                                                     | 2,496                     | 25.2                  | 2,318                              | 26.1         | 152                                                | 15.7         | 26                        | 36.1         |
| Unknown                                                                                                                                                                                   | 42                        | 0.4                   | 38                                 | 0.4          | 4                                                  | 0.4          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>9,917</b>              | <b>100.0</b>          | <b>8,876</b>                       | <b>100.0</b> | <b>969</b>                                         | <b>100.0</b> | <b>72</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | <b>89.5</b>  |                                                    | <b>9.8</b>   |                           | <b>0.7</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1                         | 0.5                   | 1                                  | 0.5          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 26                        | 11.8                  | 17                                 | 8.7          | 9                                                  | 37.5         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 128                       | 58.2                  | 115                                | 59.0         | 12                                                 | 50.0         | 1                         | 100.0        |
| Upper                                                                                                                                                                                     | 65                        | 29.5                  | 62                                 | 31.8         | 3                                                  | 12.5         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>220</b>                | <b>100.0</b>          | <b>195</b>                         | <b>100.0</b> | <b>24</b>                                          | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | <b>88.6</b>  |                                                    | <b>10.9</b>  |                           | <b>0.5</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D 113A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Kalamazoo-Portage MSA                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 5.2   | 0       | 0.0   | 2.6   | 0    | 0.0   | 5.6   | 0       | 0.0   | 2.2   | 2.8                          |
| Moderate                                                                         | 2                                | 20.0  | 15.0  | 587     | 27.6  | 9.8   | 2    | 50.0  | 25.0  | 233     | 38.4  | 16.0  | 18.4                         |
| Middle                                                                           | 5                                | 50.0  | 47.7  | 845     | 39.8  | 42.6  | 1    | 25.0  | 36.7  | 174     | 28.7  | 36.2  | 42.6                         |
| Upper                                                                            | 3                                | 30.0  | 32.0  | 691     | 32.5  | 44.9  | 1    | 25.0  | 32.5  | 200     | 32.9  | 45.3  | 36.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                            | 10                               | 100.0 | 100.0 | 2,123   | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 607     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 1.8   | 0       | 0.0   | 1.0   | 2    | 7.7   | 1.9   | 184     | 4.8   | 1.1   | 2.8                          |
| Moderate                                                                         | 2                                | 5.0   | 8.8   | 150     | 2.6   | 5.7   | 4    | 15.4  | 17.7  | 282     | 7.4   | 12.2  | 18.4                         |
| Middle                                                                           | 20                               | 50.0  | 49.5  | 2,453   | 43.1  | 42.6  | 11   | 42.3  | 41.8  | 1,774   | 46.5  | 38.1  | 42.6                         |
| Upper                                                                            | 18                               | 45.0  | 39.8  | 3,088   | 54.3  | 50.7  | 9    | 34.6  | 38.7  | 1,579   | 41.3  | 48.6  | 36.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                            | 40                               | 100.0 | 100.0 | 5,691   | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 3,819   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.0   | 0       | 0.0   | 2.2   | 0    | 0.0   | 2.1   | 0       | 0.0   | 2.1   | 2.8                          |
| Moderate                                                                         | 3                                | 21.4  | 9.7   | 142     | 15.1  | 6.7   | 3    | 21.4  | 15.0  | 286     | 19.1  | 11.0  | 18.4                         |
| Middle                                                                           | 7                                | 50.0  | 46.9  | 473     | 50.2  | 43.1  | 4    | 28.6  | 38.3  | 386     | 25.8  | 36.5  | 42.6                         |
| Upper                                                                            | 4                                | 28.6  | 40.4  | 327     | 34.7  | 47.9  | 7    | 50.0  | 44.7  | 825     | 55.1  | 50.4  | 36.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                            | 14                               | 100.0 | 100.0 | 942     | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,497   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 10.8  | 0       | 0.0   | 5.7   | 0    | 0.0   | 14.0  | 0       | 0.0   | 11.7  | 12.4                         |
| Moderate                                                                         | 0                                | 0.0   | 32.4  | 0       | 0.0   | 36.9  | 0    | 0.0   | 23.3  | 0       | 0.0   | 10.6  | 26.0                         |
| Middle                                                                           | 0                                | 0.0   | 35.1  | 0       | 0.0   | 32.7  | 0    | 0.0   | 39.5  | 0       | 0.0   | 62.7  | 40.0                         |
| Upper                                                                            | 0                                | 0.0   | 21.6  | 0       | 0.0   | 24.7  | 0    | 0.0   | 14.0  | 0       | 0.0   | 9.7   | 16.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 9.3   | 0       | 0.0   | 5.2   | 4.8                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 1                                | 1.3   | 3.1   | 100     | 1.0   | 1.9   | 3    | 5.4   | 3.7   | 284     | 3.4   | 2.9   | 2.8                          |
| Moderate                                                                         | 7                                | 9.2   | 11.1  | 879     | 8.8   | 9.3   | 11   | 19.6  | 20.7  | 836     | 10.0  | 14.1  | 18.4                         |
| Middle                                                                           | 40                               | 52.6  | 48.5  | 4,358   | 43.5  | 41.9  | 22   | 39.3  | 38.8  | 3,818   | 45.9  | 39.7  | 42.6                         |
| Upper                                                                            | 28                               | 36.8  | 37.1  | 4,688   | 46.8  | 46.7  | 20   | 35.7  | 36.5  | 3,389   | 40.7  | 42.7  | 36.0                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.7   | 0.1                          |
| Total                                                                            | 76                               | 100.0 | 100.0 | 10,025  | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 8,327   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D 113B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Kalamazoo-Portage MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                              | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                            | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                            | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                            | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                        | 1                                | 8.3   | 2.5   | 100     | 7.9   | 2.1   | 1    | 8.3   | 2.1   | 100     | 4.2   | 0.7   | 2.8                          |
| Moderate                                                                                                                   | 0                                | 0.0   | 9.6   | 0       | 0.0   | 6.7   | 2    | 16.7  | 10.2  | 35      | 1.5   | 5.2   | 18.4                         |
| Middle                                                                                                                     | 8                                | 66.7  | 48.2  | 587     | 46.3  | 44.9  | 6    | 50.0  | 42.6  | 1,484   | 61.7  | 41.9  | 42.6                         |
| Upper                                                                                                                      | 3                                | 25.0  | 39.6  | 582     | 45.9  | 46.3  | 3    | 25.0  | 45.1  | 785     | 32.7  | 52.2  | 36.0                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                  | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                      | 12                               | 100.0 | 100.0 | 1,269   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 2,404   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                                | 0.0   | 2.8   | 0       | 0.0   | 1.2   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.4   | 2.8                          |
| Moderate                                                                                                                   | 0                                | 0.0   | 11.3  | 0       | 0.0   | 7.3   | 0    | 0.0   | 17.1  | 0       | 0.0   | 15.0  | 18.4                         |
| Middle                                                                                                                     | 0                                | 0.0   | 38.3  | 0       | 0.0   | 30.0  | 0    | 0.0   | 43.0  | 0       | 0.0   | 43.9  | 42.6                         |
| Upper                                                                                                                      | 0                                | 0.0   | 47.5  | 0       | 0.0   | 61.4  | 0    | 0.0   | 39.1  | 0       | 0.0   | 40.6  | 36.0                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                  | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                      | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                                | 0.0   | 4.2   | 0       | 0.0   | 2.9   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2.8                          |
| Moderate                                                                                                                   | 0                                | 0.0   | 13.9  | 0       | 0.0   | 8.6   | 0    | 0.0   | 39.0  | 0       | 0.0   | 26.3  | 18.4                         |
| Middle                                                                                                                     | 0                                | 0.0   | 59.7  | 0       | 0.0   | 54.0  | 0    | 0.0   | 28.8  | 0       | 0.0   | 29.0  | 42.6                         |
| Upper                                                                                                                      | 0                                | 0.0   | 22.2  | 0       | 0.0   | 34.4  | 0    | 0.0   | 32.2  | 0       | 0.0   | 44.7  | 36.0                         |
| Unknown                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                  | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                      | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D114A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Kalamazoo-Portage MSA                                  |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.5   | 0       | 0.0   | 2.4   | 4.9                          |
| Moderate                                                                | 0                        | 0.0   | 13.0  | 0       | 0.0   | 8.5   | 11.1                         |
| Middle                                                                  | 5                        | 62.5  | 49.1  | 807     | 56.3  | 44.4  | 50.7                         |
| Upper                                                                   | 3                        | 37.5  | 33.3  | 627     | 43.7  | 44.7  | 33.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                   | 8                        | 100.0 | 100.0 | 1,434   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 5.3   | 1.4   | 89      | 3.0   | 0.8   | 4.9                          |
| Moderate                                                                | 3                        | 15.8  | 7.0   | 373     | 12.5  | 4.4   | 11.1                         |
| Middle                                                                  | 10                       | 52.6  | 46.9  | 1,622   | 54.4  | 39.8  | 50.7                         |
| Upper                                                                   | 5                        | 26.3  | 44.6  | 897     | 30.1  | 54.8  | 33.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                   | 19                       | 100.0 | 100.0 | 2,981   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.5   | 0       | 0.0   | 1.2   | 4.9                          |
| Moderate                                                                | 0                        | 0.0   | 7.3   | 0       | 0.0   | 5.2   | 11.1                         |
| Middle                                                                  | 1                        | 50.0  | 45.9  | 50      | 25.0  | 38.2  | 50.7                         |
| Upper                                                                   | 1                        | 50.0  | 44.1  | 150     | 75.0  | 55.4  | 33.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 200     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 6.9   | 0       | 0.0   | 3.7   | 20.2                         |
| Moderate                                                                | 0                        | 0.0   | 17.2  | 0       | 0.0   | 4.0   | 19.0                         |
| Middle                                                                  | 0                        | 0.0   | 48.3  | 0       | 0.0   | 57.9  | 47.3                         |
| Upper                                                                   | 0                        | 0.0   | 27.6  | 0       | 0.0   | 34.5  | 12.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.3                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 1                        | 2.8   | 2.6   | 89      | 1.6   | 1.6   | 4.9                          |
| Moderate                                                                | 3                        | 8.3   | 9.2   | 373     | 6.6   | 5.9   | 11.1                         |
| Middle                                                                  | 19                       | 52.8  | 48.0  | 2,837   | 49.9  | 42.8  | 50.7                         |
| Upper                                                                   | 13                       | 36.1  | 40.1  | 2,388   | 42.0  | 49.6  | 33.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                   | 36                       | 100.0 | 100.0 | 5,687   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D114B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Kalamazoo-Portage MSA                                           |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income Level                                                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.2   | 0       | 0.0   | 1.8   | 4.9                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 7.8   | 0       | 0.0   | 5.4   | 11.1                         |
| Middle                                                                                                                                                      | 3                        | 42.9  | 48.7  | 358     | 33.4  | 47.8  | 50.7                         |
| Upper                                                                                                                                                       | 4                        | 57.1  | 41.2  | 714     | 66.6  | 45.0  | 33.3                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 7                        | 100.0 | 100.0 | 1,072   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.2   | 4.9                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 7.4   | 0       | 0.0   | 4.5   | 11.1                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 57.0  | 0       | 0.0   | 46.2  | 50.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 34.8  | 0       | 0.0   | 49.0  | 33.3                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.5   | 0       | 0.0   | 2.1   | 4.9                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 13.8  | 0       | 0.0   | 10.2  | 11.1                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 61.6  | 0       | 0.0   | 55.2  | 50.7                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 20.1  | 0       | 0.0   | 32.6  | 33.3                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table D115**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Kalamazoo-Portage MSA                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income Level                                                                                                                                                                | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | %     | %     | \$(000) | \$%   | \$%   | #    | %     | %     | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                                                                                       | 3                                | 3.8   | 8.1   | 535     | 3.4   | 9.4   | 3    | 5.9   | 7.7   | 323     | 2.4   | 9.3   | 6.4                      |
| Moderate                                                                                                                                                                                  | 31                               | 38.8  | 17.5  | 8,334   | 53.6  | 20.1  | 9    | 17.6  | 16.8  | 3,244   | 23.7  | 13.9  | 18.7                     |
| Middle                                                                                                                                                                                    | 28                               | 35.0  | 45.8  | 3,741   | 24.1  | 48.3  | 22   | 43.1  | 38.6  | 5,941   | 43.5  | 43.8  | 41.3                     |
| Upper                                                                                                                                                                                     | 18                               | 22.5  | 28.0  | 2,941   | 18.9  | 22.1  | 17   | 33.3  | 36.1  | 4,151   | 30.4  | 32.1  | 33.1                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.7   | 0.4                      |
| Total                                                                                                                                                                                     | 80                               | 100.0 | 100.0 | 15,551  | 100.0 | 100.0 | 51   | 100.0 | 100.0 | 13,659  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D 116**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Kalamazoo-Portage MSA                                                                        |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                                                                                       | 16                       | 12.5  | 7.8   | 1,633   | 6.9   | 8.2   | 8.0                      |
| Moderate                                                                                                                                                                                  | 43                       | 33.6  | 20.2  | 10,617  | 44.7  | 21.3  | 20.3                     |
| Middle                                                                                                                                                                                    | 48                       | 37.5  | 44.2  | 7,809   | 32.9  | 45.5  | 46.1                     |
| Upper                                                                                                                                                                                     | 21                       | 16.4  | 27.4  | 3,679   | 15.5  | 24.9  | 25.2                     |
| Unknown                                                                                                                                                                                   | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.4                      |
| Total                                                                                                                                                                                     | 128                      | 100.0 | 100.0 | 23,738  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D117A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Kalamazoo-Portage MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                            | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                        | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                        | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                        | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 3                                | 30.0  | 11.5  | 275     | 13.0  | 6.0   | 2    | 50.0  | 11.2  | 233     | 38.4  | 6.0   | 21.5                              |
| Moderate                                                                                                               | 3                                | 30.0  | 23.6  | 786     | 37.0  | 17.3  | 0    | 0.0   | 21.4  | 0       | 0.0   | 16.0  | 18.3                              |
| Middle                                                                                                                 | 1                                | 10.0  | 23.8  | 261     | 12.3  | 22.2  | 1    | 25.0  | 20.9  | 174     | 28.7  | 20.4  | 19.7                              |
| Upper                                                                                                                  | 2                                | 20.0  | 30.1  | 587     | 27.6  | 43.6  | 0    | 0.0   | 28.7  | 0       | 0.0   | 44.0  | 40.5                              |
| Unknown                                                                                                                | 1                                | 10.0  | 11.0  | 214     | 10.1  | 10.9  | 1    | 25.0  | 17.8  | 200     | 32.9  | 13.6  | 0.0                               |
| Total                                                                                                                  | 10                               | 100.0 | 100.0 | 2,123   | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 607     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 6                                | 15.0  | 9.0   | 544     | 9.6   | 4.8   | 5    | 19.2  | 14.7  | 250     | 6.5   | 8.5   | 21.5                              |
| Moderate                                                                                                               | 15                               | 37.5  | 20.5  | 1,838   | 32.3  | 14.6  | 9    | 34.6  | 23.8  | 1,053   | 27.6  | 18.8  | 18.3                              |
| Middle                                                                                                                 | 7                                | 17.5  | 23.8  | 888     | 15.6  | 20.7  | 5    | 19.2  | 23.3  | 828     | 21.7  | 21.4  | 19.7                              |
| Upper                                                                                                                  | 8                                | 20.0  | 35.6  | 1,806   | 31.7  | 48.6  | 7    | 26.9  | 31.0  | 1,688   | 44.2  | 42.6  | 40.5                              |
| Unknown                                                                                                                | 4                                | 10.0  | 11.1  | 615     | 10.8  | 11.3  | 0    | 0.0   | 7.3   | 0       | 0.0   | 8.6   | 0.0                               |
| Total                                                                                                                  | 40                               | 100.0 | 100.0 | 5,691   | 100.0 | 100.0 | 26   | 100.0 | 100.0 | 3,819   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 2                                | 14.3  | 10.2  | 127     | 13.5  | 7.4   | 2    | 14.3  | 11.0  | 236     | 15.8  | 7.7   | 21.5                              |
| Moderate                                                                                                               | 6                                | 42.9  | 19.9  | 448     | 47.6  | 15.2  | 2    | 14.3  | 21.9  | 300     | 20.0  | 16.9  | 18.3                              |
| Middle                                                                                                                 | 2                                | 14.3  | 22.4  | 40      | 4.2   | 21.5  | 7    | 50.0  | 24.1  | 611     | 40.8  | 21.3  | 19.7                              |
| Upper                                                                                                                  | 4                                | 28.6  | 45.1  | 327     | 34.7  | 53.2  | 3    | 21.4  | 39.8  | 350     | 23.4  | 50.8  | 40.5                              |
| Unknown                                                                                                                | 0                                | 0.0   | 2.4   | 0       | 0.0   | 2.7   | 0    | 0.0   | 3.2   | 0       | 0.0   | 3.3   | 0.0                               |
| Total                                                                                                                  | 14                               | 100.0 | 100.0 | 942     | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,497   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                    | 14                               | 18.4  | 10.0  | 1,191   | 11.9  | 5.4   | 10   | 17.9  | 12.1  | 745     | 8.9   | 6.8   | 21.5                              |
| Moderate                                                                                                               | 27                               | 35.5  | 21.3  | 3,179   | 31.7  | 15.7  | 15   | 26.8  | 22.0  | 1,829   | 22.0  | 16.8  | 18.3                              |
| Middle                                                                                                                 | 14                               | 18.4  | 23.5  | 1,750   | 17.5  | 21.3  | 17   | 30.4  | 22.0  | 1,942   | 23.3  | 20.7  | 19.7                              |
| Upper                                                                                                                  | 16                               | 21.1  | 34.5  | 3,076   | 30.7  | 46.6  | 11   | 19.6  | 31.6  | 2,211   | 26.6  | 44.3  | 40.5                              |
| Unknown                                                                                                                | 5                                | 6.6   | 10.7  | 829     | 8.3   | 11.1  | 3    | 5.4   | 12.3  | 1,600   | 19.2  | 11.5  | 0.0                               |
| Total                                                                                                                  | 76                               | 100.0 | 100.0 | 10,025  | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 8,327   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D117B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Kalamazoo-Portage MSA                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 3                                | 25.0  | 13.2  | 245     | 19.3  | 8.9   | 1    | 8.3   | 11.6  | 26      | 1.1   | 6.7   | 21.5                              |
| Moderate                                                                                                                                                    | 3                                | 25.0  | 19.3  | 107     | 8.4   | 12.9  | 4    | 33.3  | 21.3  | 476     | 19.8  | 15.4  | 18.3                              |
| Middle                                                                                                                                                      | 4                                | 33.3  | 19.6  | 561     | 44.2  | 17.5  | 4    | 33.3  | 22.7  | 329     | 13.7  | 19.5  | 19.7                              |
| Upper                                                                                                                                                       | 2                                | 16.7  | 43.9  | 356     | 28.1  | 55.7  | 1    | 8.3   | 41.4  | 173     | 7.2   | 56.3  | 40.5                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 3.9   | 0       | 0.0   | 5.0   | 2    | 16.7  | 3.0   | 1,400   | 58.2  | 2.1   | 0.0                               |
| Total                                                                                                                                                       | 12                               | 100.0 | 100.0 | 1,269   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 2,404   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 10.6  | 0       | 0.0   | 6.4   | 0    | 0.0   | 10.5  | 0       | 0.0   | 6.4   | 21.5                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 14.9  | 0       | 0.0   | 9.7   | 0    | 0.0   | 21.3  | 0       | 0.0   | 16.8  | 18.3                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 27.0  | 0       | 0.0   | 20.9  | 0    | 0.0   | 22.9  | 0       | 0.0   | 19.7  | 19.7                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 43.3  | 0       | 0.0   | 59.2  | 0    | 0.0   | 42.6  | 0       | 0.0   | 54.2  | 40.5                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 4.3   | 0       | 0.0   | 3.7   | 0    | 0.0   | 2.7   | 0       | 0.0   | 2.9   | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.5                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.3                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.7                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.5                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |



Table D118A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Kalamazoo-Portage MSA |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                      | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                               | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                               | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 1                        | 12.5  | 14.5  | 77      | 5.4   | 8.3   | 21.7                              |
| Moderate                                                                                                      | 1                        | 12.5  | 25.6  | 135     | 9.4   | 19.8  | 17.1                              |
| Middle                                                                                                        | 3                        | 37.5  | 21.9  | 472     | 32.9  | 21.9  | 20.3                              |
| Upper                                                                                                         | 2                        | 25.0  | 27.0  | 544     | 37.9  | 39.2  | 40.9                              |
| Unknown                                                                                                       | 1                        | 12.5  | 11.0  | 206     | 14.4  | 10.7  | 0.0                               |
| Total                                                                                                         | 8                        | 100.0 | 100.0 | 1,434   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 3                        | 15.8  | 7.5   | 265     | 8.9   | 3.8   | 21.7                              |
| Moderate                                                                                                      | 5                        | 26.3  | 17.1  | 707     | 23.7  | 11.7  | 17.1                              |
| Middle                                                                                                        | 6                        | 31.6  | 23.3  | 846     | 28.4  | 19.9  | 20.3                              |
| Upper                                                                                                         | 3                        | 15.8  | 39.1  | 822     | 27.6  | 51.0  | 40.9                              |
| Unknown                                                                                                       | 2                        | 10.5  | 13.0  | 341     | 11.4  | 13.6  | 0.0                               |
| Total                                                                                                         | 19                       | 100.0 | 100.0 | 2,981   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 0                        | 0.0   | 11.6  | 0       | 0.0   | 7.5   | 21.7                              |
| Moderate                                                                                                      | 1                        | 50.0  | 18.6  | 150     | 75.0  | 14.4  | 17.1                              |
| Middle                                                                                                        | 0                        | 0.0   | 22.7  | 0       | 0.0   | 19.3  | 20.3                              |
| Upper                                                                                                         | 0                        | 0.0   | 43.9  | 0       | 0.0   | 55.7  | 40.9                              |
| Unknown                                                                                                       | 1                        | 50.0  | 3.2   | 50      | 25.0  | 3.1   | 0.0                               |
| Total                                                                                                         | 2                        | 100.0 | 100.0 | 200     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                           | 4                        | 11.1  | 10.2  | 342     | 6.0   | 5.6   | 21.7                              |
| Moderate                                                                                                      | 9                        | 25.0  | 20.0  | 1,106   | 19.4  | 14.7  | 17.1                              |
| Middle                                                                                                        | 10                       | 27.8  | 22.3  | 1,418   | 24.9  | 20.4  | 20.3                              |
| Upper                                                                                                         | 8                        | 22.2  | 34.7  | 2,124   | 37.3  | 46.3  | 40.9                              |
| Unknown                                                                                                       | 5                        | 13.9  | 12.8  | 697     | 12.3  | 13.0  | 0.0                               |
| Total                                                                                                         | 36                       | 100.0 | 100.0 | 5,687   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                       |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                     |                          |       |       |         |       |       |                                   |

Table D118B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Kalamazoo-Portage MSA                                               |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income Level                                                                                                                                    | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 14.5  | 0       | 0.0   | 11.6  | 21.7                              |
| Moderate                                                                                                                                                    | 2                        | 28.6  | 21.4  | 114     | 10.6  | 15.8  | 17.1                              |
| Middle                                                                                                                                                      | 1                        | 14.3  | 19.2  | 100     | 9.3   | 19.8  | 20.3                              |
| Upper                                                                                                                                                       | 3                        | 42.9  | 43.5  | 758     | 70.7  | 50.7  | 40.9                              |
| Unknown                                                                                                                                                     | 1                        | 14.3  | 1.4   | 100     | 9.3   | 2.0   | 0.0                               |
| Total                                                                                                                                                       | 7                        | 100.0 | 100.0 | 1,072   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 11.9  | 0       | 0.0   | 4.9   | 21.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 20.0  | 0       | 0.0   | 12.2  | 17.1                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 25.2  | 0       | 0.0   | 18.3  | 20.3                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 37.8  | 0       | 0.0   | 59.7  | 40.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 5.2   | 0       | 0.0   | 4.9   | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.2   | 21.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.1                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.3                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.8   | 40.9                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 99.1  | 0       | 0.0   | 99.1  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

Table D119

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|--|
| Assessment Area: Kalamazoo-Portage MSA                                                                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
|                                                                                                                                                                                           | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |  |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |  |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |  |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |  |
| By Revenue                                                                                                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| \$1 Million or Less                                                                                                                                                                       | 34                               | 42.5  | 47.8  | 5,674   | 36.5  | 30.4  | 15   | 29.4  | 50.1  | 2,362   | 17.3  | 32.5  | 89.7                     |  |
| Over \$1 Million                                                                                                                                                                          | 33                               | 41.3  |       | 7,150   | 46.0  |       | 32   | 62.7  |       | 10,475  | 76.7  |       | 9.6                      |  |
| Revenue Unknown                                                                                                                                                                           | 13                               | 16.3  |       | 2,727   | 17.5  |       | 4    | 7.8   |       | 822     | 6.0   |       | 0.8                      |  |
| Total                                                                                                                                                                                     | 80                               | 100.0 |       | 15,551  | 100.0 |       | 51   | 100.0 |       | 13,659  | 100.0 |       | 100.0                    |  |
| By Loan Size                                                                                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| \$100,000 or Less                                                                                                                                                                         | 41                               | 51.3  | 86.9  | 2,151   | 13.8  | 26.0  | 18   | 35.3  | 91.9  | 1,097   | 8.0   | 30.7  |                          |  |
| \$100,001 - \$250,000                                                                                                                                                                     | 21                               | 26.3  | 7.1   | 3,842   | 24.7  | 19.5  | 17   | 33.3  | 3.8   | 3,404   | 24.9  | 14.7  |                          |  |
| \$250,001 - \$1 Million                                                                                                                                                                   | 18                               | 22.5  | 5.9   | 9,558   | 61.5  | 54.4  | 16   | 31.4  | 4.2   | 9,158   | 67.0  | 54.5  |                          |  |
| Total                                                                                                                                                                                     | 80                               | 100.0 | 100.0 | 15,551  | 100.0 | 100.0 | 51   | 100.0 | 100.0 | 13,659  | 100.0 | 100.0 |                          |  |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| \$100,000 or Less                                                                                                                                                                         | 25                               | 73.5  |       | 1,135   | 20.0  |       | 11   | 73.3  |       | 662     | 28.0  |       |                          |  |
| \$100,001 - \$250,000                                                                                                                                                                     | 3                                | 8.8   |       | 556     | 9.8   |       | 2    | 13.3  |       | 350     | 14.8  |       |                          |  |
| \$250,001 - \$1 Million                                                                                                                                                                   | 6                                | 17.6  |       | 3,983   | 70.2  |       | 2    | 13.3  |       | 1,350   | 57.2  |       |                          |  |
| Total                                                                                                                                                                                     | 34                               | 100.0 |       | 5,674   | 100.0 |       | 15   | 100.0 |       | 2,362   | 100.0 |       |                          |  |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |

Table D120

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Kalamazoo-Portage MSA                                    |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | %     | \$(000) | %     | \$%   |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 62                       | 48.4  | 36.9  | 8,526   | 35.9  | 26.5  | 89.5                     |
| Over \$1 Million                                                          | 45                       | 35.2  |       | 10,988  | 46.3  |       | 9.8                      |
| Revenue Unknown                                                           | 21                       | 16.4  |       | 4,224   | 17.8  |       | 0.7                      |
| Total                                                                     | 128                      | 100.0 |       | 23,738  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 74                       | 57.8  | 81.2  | 3,388   | 14.3  | 23.2  |                          |
| \$100,001 - \$250,000                                                     | 23                       | 18.0  | 10.3  | 3,956   | 16.7  | 20.9  |                          |
| \$250,001 - \$1 Million                                                   | 31                       | 24.2  | 8.5   | 16,394  | 69.1  | 55.8  |                          |
| Total                                                                     | 128                      | 100.0 | 100.0 | 23,738  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 46                       | 74.2  |       | 1,933   | 22.7  |       |                          |
| \$100,001 - \$250,000                                                     | 7                        | 11.3  |       | 1,186   | 13.9  |       |                          |
| \$250,001 - \$1 Million                                                   | 9                        | 14.5  |       | 5,407   | 63.4  |       |                          |
| Total                                                                     | 62                       | 100.0 |       | 8,526   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table D121

| 2022 Combined Demographics                                                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Lansing-East Lansing Metropolitan                                                                      |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 7                         | 5.1                   | 3,827                              | 3.4       | 1,317                                              | 34.4      | 22,238                    | 20.0      |
| Moderate                                                                                                                | 26                        | 19.1                  | 18,104                             | 16.3      | 2,789                                              | 15.4      | 18,899                    | 17.0      |
| Middle                                                                                                                  | 57                        | 41.9                  | 51,512                             | 46.3      | 3,315                                              | 6.4       | 24,193                    | 21.8      |
| Upper                                                                                                                   | 34                        | 25.0                  | 37,477                             | 33.7      | 1,237                                              | 3.3       | 45,827                    | 41.2      |
| Unknown                                                                                                                 | 12                        | 8.8                   | 237                                | 0.2       | 73                                                 | 30.8      | 0                         | 0.0       |
| Total AA                                                                                                                | 136                       | 100.0                 | 111,157                            | 100.0     | 8,731                                              | 7.9       | 111,157                   | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 9,171                     | 3,136                 | 2.5                                | 34.2      | 4,614                                              | 50.3      | 1,421                     | 15.5      |
| Moderate                                                                                                                | 39,788                    | 17,590                | 14.1                               | 44.2      | 17,917                                             | 45.0      | 4,281                     | 10.8      |
| Middle                                                                                                                  | 92,813                    | 59,391                | 47.8                               | 64.0      | 27,450                                             | 29.6      | 5,972                     | 6.4       |
| Upper                                                                                                                   | 57,931                    | 44,046                | 35.4                               | 76.0      | 11,565                                             | 20.0      | 2,320                     | 4.0       |
| Unknown                                                                                                                 | 3,911                     | 193                   | 0.2                                | 4.9       | 2,995                                              | 76.6      | 723                       | 18.5      |
| Total AA                                                                                                                | 203,614                   | 124,356               | 100.0                              | 61.1      | 64,541                                             | 31.7      | 14,717                    | 7.2       |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 972                       | 5.4                   | 855                                | 5.2       | 113                                                | 7.8       | 4                         | 2.0       |
| Moderate                                                                                                                | 3,551                     | 19.6                  | 3,142                              | 19.0      | 355                                                | 24.4      | 54                        | 26.6      |
| Middle                                                                                                                  | 7,829                     | 43.1                  | 7,132                              | 43.2      | 619                                                | 42.5      | 78                        | 38.4      |
| Upper                                                                                                                   | 5,264                     | 29.0                  | 4,885                              | 29.6      | 320                                                | 22.0      | 59                        | 29.1      |
| Unknown                                                                                                                 | 547                       | 3.0                   | 490                                | 3.0       | 49                                                 | 3.4       | 8                         | 3.9       |
| Total AA                                                                                                                | 18,163                    | 100.0                 | 16,504                             | 100.0     | 1,456                                              | 100.0     | 203                       | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 90.9      |                                                    | 8.0       |                           | 1.1       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 3                         | 0.5                   | 3                                  | 0.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 20                        | 3.1                   | 20                                 | 3.2       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                  | 380                       | 59.8                  | 370                                | 59.7      | 9                                                  | 64.3      | 1                         | 100.0     |
| Upper                                                                                                                   | 227                       | 35.7                  | 224                                | 36.1      | 3                                                  | 21.4      | 0                         | 0.0       |
| Unknown                                                                                                                 | 5                         | 0.8                   | 3                                  | 0.5       | 2                                                  | 14.3      | 0                         | 0.0       |
| Total AA                                                                                                                | 635                       | 100.0                 | 620                                | 100.0     | 14                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 97.6      |                                                    | 2.2       |                           | 0.2       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table D122

| 2021 Combined Demographics                                     |                           |                       |                                    |           |                                                    |           |                           |           |
|----------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Lansing-East Lansing Metropolitan             |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                              | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 9                         | 6.9                   | 4,657                              | 4.3       | 1,915                                              | 41.1      | 22,380                    | 20.5      |
| Moderate                                                       | 27                        | 20.6                  | 20,408                             | 18.7      | 4,562                                              | 22.4      | 18,724                    | 17.1      |
| Middle                                                         | 52                        | 39.7                  | 47,500                             | 43.4      | 3,542                                              | 7.5       | 22,161                    | 20.3      |
| Upper                                                          | 34                        | 26.0                  | 36,654                             | 33.5      | 1,799                                              | 4.9       | 46,107                    | 42.2      |
| Unknown                                                        | 9                         | 6.9                   | 153                                | 0.1       | 62                                                 | 40.5      | 0                         | 0.0       |
| Total AA                                                       | 131                       | 100.0                 | 109,372                            | 100.0     | 11,880                                             | 10.9      | 109,372                   | 100.0     |
|                                                                | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                            | 13,332                    | 2,713                 | 2.3                                | 20.3      | 8,280                                              | 62.1      | 2,339                     | 17.5      |
| Moderate                                                       | 42,742                    | 19,909                | 16.9                               | 46.6      | 17,972                                             | 42.0      | 4,861                     | 11.4      |
| Middle                                                         | 81,195                    | 53,434                | 45.3                               | 65.8      | 21,535                                             | 26.5      | 6,226                     | 7.7       |
| Upper                                                          | 60,959                    | 41,804                | 35.4                               | 68.6      | 15,927                                             | 26.1      | 3,228                     | 5.3       |
| Unknown                                                        | 1,483                     | 156                   | 0.1                                | 10.5      | 1,177                                              | 79.4      | 150                       | 10.1      |
| Total AA                                                       | 199,711                   | 118,016               | 100.0                              | 59.1      | 64,891                                             | 32.5      | 16,804                    | 8.4       |
|                                                                | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 1,327                     | 7.3                   | 1,128                              | 6.9       | 192                                                | 12.9      | 7                         | 3.4       |
| Moderate                                                       | 3,551                     | 19.6                  | 3,154                              | 19.2      | 345                                                | 23.1      | 52                        | 25.2      |
| Middle                                                         | 6,602                     | 36.4                  | 6,077                              | 37.0      | 443                                                | 29.7      | 82                        | 39.8      |
| Upper                                                          | 6,265                     | 34.5                  | 5,731                              | 34.9      | 477                                                | 31.9      | 57                        | 27.7      |
| Unknown                                                        | 399                       | 2.2                   | 354                                | 2.2       | 37                                                 | 2.5       | 8                         | 3.9       |
| Total AA                                                       | 18,144                    | 100.0                 | 16,444                             | 100.0     | 1,494                                              | 100.0     | 206                       | 100.0     |
| Percentage of Total Businesses:                                |                           |                       |                                    | 90.6      |                                                    | 8.2       |                           | 1.1       |
|                                                                | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                            | 4                         | 0.6                   | 4                                  | 0.6       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                       | 23                        | 3.6                   | 23                                 | 3.7       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                         | 410                       | 64.6                  | 401                                | 64.6      | 8                                                  | 61.5      | 1                         | 100.0     |
| Upper                                                          | 192                       | 30.2                  | 189                                | 30.4      | 3                                                  | 23.1      | 0                         | 0.0       |
| Unknown                                                        | 6                         | 0.9                   | 4                                  | 0.6       | 2                                                  | 15.4      | 0                         | 0.0       |
| Total AA                                                       | 635                       | 100.0                 | 621                                | 100.0     | 13                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                     |                           |                       |                                    | 97.8      |                                                    | 2.0       |                           | 0.2       |
| Source: 2021 FFIEC Census Data                                 |                           |                       |                                    |           |                                                    |           |                           |           |
| 2021 Dun & Bradstreet Data                                     |                           |                       |                                    |           |                                                    |           |                           |           |
| 2011-2015 U.S. Census Bureau: American Community Survey        |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

Table D123

| 2020 Combined Demographics                                                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Lansing-East Lansing Metropolitan                                                                      |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 9                         | 6.9                   | 4,657                              | 4.3       | 1,915                                              | 41.1      | 22,380                    | 20.5      |
| Moderate                                                                                                                | 27                        | 20.6                  | 20,408                             | 18.7      | 4,562                                              | 22.4      | 18,724                    | 17.1      |
| Middle                                                                                                                  | 52                        | 39.7                  | 47,500                             | 43.4      | 3,542                                              | 7.5       | 22,161                    | 20.3      |
| Upper                                                                                                                   | 34                        | 26.0                  | 36,654                             | 33.5      | 1,799                                              | 4.9       | 46,107                    | 42.2      |
| Unknown                                                                                                                 | 9                         | 6.9                   | 153                                | 0.1       | 62                                                 | 40.5      | 0                         | 0.0       |
| Total AA                                                                                                                | 131                       | 100.0                 | 109,372                            | 100.0     | 11,880                                             | 10.9      | 109,372                   | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 13,332                    | 2,713                 | 2.3                                | 20.3      | 8,280                                              | 62.1      | 2,339                     | 17.5      |
| Moderate                                                                                                                | 42,742                    | 19,909                | 16.9                               | 46.6      | 17,972                                             | 42.0      | 4,861                     | 11.4      |
| Middle                                                                                                                  | 81,195                    | 53,434                | 45.3                               | 65.8      | 21,535                                             | 26.5      | 6,226                     | 7.7       |
| Upper                                                                                                                   | 60,959                    | 41,804                | 35.4                               | 68.6      | 15,927                                             | 26.1      | 3,228                     | 5.3       |
| Unknown                                                                                                                 | 1,483                     | 156                   | 0.1                                | 10.5      | 1,177                                              | 79.4      | 150                       | 10.1      |
| Total AA                                                                                                                | 199,711                   | 118,016               | 100.0                              | 59.1      | 64,891                                             | 32.5      | 16,804                    | 8.4       |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 1,314                     | 7.2                   | 1,115                              | 6.7       | 193                                                | 12.4      | 6                         | 3.0       |
| Moderate                                                                                                                | 3,575                     | 19.5                  | 3,168                              | 19.1      | 356                                                | 22.9      | 51                        | 25.9      |
| Middle                                                                                                                  | 6,734                     | 36.7                  | 6,180                              | 37.3      | 475                                                | 30.5      | 79                        | 40.1      |
| Upper                                                                                                                   | 6,301                     | 34.4                  | 5,752                              | 34.7      | 495                                                | 31.8      | 54                        | 27.4      |
| Unknown                                                                                                                 | 405                       | 2.2                   | 360                                | 2.2       | 38                                                 | 2.4       | 7                         | 3.6       |
| Total AA                                                                                                                | 18,329                    | 100.0                 | 16,575                             | 100.0     | 1,557                                              | 100.0     | 197                       | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 90.4      |                                                    | 8.5       |                           | 1.1       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 5                         | 0.7                   | 5                                  | 0.8       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 23                        | 3.4                   | 23                                 | 3.5       | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                  | 433                       | 64.4                  | 424                                | 64.4      | 8                                                  | 61.5      | 1                         | 100.0     |
| Upper                                                                                                                   | 205                       | 30.5                  | 202                                | 30.7      | 3                                                  | 23.1      | 0                         | 0.0       |
| Unknown                                                                                                                 | 6                         | 0.9                   | 4                                  | 0.6       | 2                                                  | 15.4      | 0                         | 0.0       |
| Total AA                                                                                                                | 672                       | 100.0                 | 658                                | 100.0     | 13                                                 | 100.0     | 1                         | 100.0     |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 97.9      |                                                    | 1.9       |                           | 0.1       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table D124A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lansing-East Lansing Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                          | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                        | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                        | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                        | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 3.6   | 0       | 0.0   | 1.8   | 1    | 9.1   | 3.6   | 111     | 8.1   | 1.7   | 2.5                          |
| Moderate                                                                                                                               | 7                                | 53.8  | 20.7  | 1,256   | 53.0  | 12.9  | 5    | 45.5  | 19.2  | 574     | 42.1  | 12.4  | 14.1                         |
| Middle                                                                                                                                 | 4                                | 30.8  | 42.2  | 585     | 24.7  | 40.5  | 4    | 36.4  | 47.0  | 471     | 34.6  | 44.1  | 47.8                         |
| Upper                                                                                                                                  | 2                                | 15.4  | 33.3  | 529     | 22.3  | 44.5  | 1    | 9.1   | 29.9  | 206     | 15.1  | 41.5  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0.2                          |
| Total                                                                                                                                  | 13                               | 100.0 | 100.0 | 2,370   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 1,362   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 1.1   | 0       | 0.0   | 0.6   | 0    | 0.0   | 2.2   | 0       | 0.0   | 1.1   | 2.5                          |
| Moderate                                                                                                                               | 7                                | 31.8  | 11.5  | 538     | 21.8  | 6.9   | 5    | 25.0  | 12.5  | 472     | 16.9  | 8.1   | 14.1                         |
| Middle                                                                                                                                 | 8                                | 36.4  | 44.3  | 885     | 35.8  | 41.2  | 8    | 40.0  | 51.6  | 1,077   | 38.6  | 48.9  | 47.8                         |
| Upper                                                                                                                                  | 7                                | 31.8  | 42.9  | 1,047   | 42.4  | 51.1  | 7    | 35.0  | 33.7  | 1,242   | 44.5  | 41.8  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.2                          |
| Total                                                                                                                                  | 22                               | 100.0 | 100.0 | 2,470   | 100.0 | 100.0 | 20   | 100.0 | 100.0 | 2,791   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 1.4   | 0       | 0.0   | 0.6   | 0    | 0.0   | 2.6   | 0       | 0.0   | 1.6   | 2.5                          |
| Moderate                                                                                                                               | 1                                | 9.1   | 15.4  | 20      | 2.0   | 9.6   | 1    | 7.1   | 11.2  | 16      | 1.6   | 7.9   | 14.1                         |
| Middle                                                                                                                                 | 5                                | 45.5  | 44.6  | 415     | 41.7  | 43.6  | 4    | 28.6  | 49.4  | 240     | 24.2  | 45.9  | 47.8                         |
| Upper                                                                                                                                  | 5                                | 45.5  | 38.6  | 561     | 56.3  | 46.2  | 9    | 64.3  | 36.6  | 735     | 74.2  | 43.7  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.9   | 0.2                          |
| Total                                                                                                                                  | 11                               | 100.0 | 100.0 | 996     | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 991     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                    | 0                                | 0.0   | 14.6  | 0       | 0.0   | 13.4  | 0    | 0.0   | 8.8   | 0       | 0.0   | 2.9   | 3.6                          |
| Moderate                                                                                                                               | 0                                | 0.0   | 33.7  | 0       | 0.0   | 17.7  | 0    | 0.0   | 25.0  | 0       | 0.0   | 23.3  | 24.0                         |
| Middle                                                                                                                                 | 1                                | 100.0 | 27.0  | 11,593  | 100.0 | 34.8  | 0    | 0.0   | 45.6  | 0       | 0.0   | 28.6  | 44.7                         |
| Upper                                                                                                                                  | 0                                | 0.0   | 23.6  | 0       | 0.0   | 33.9  | 1    | 100.0 | 10.3  | 7,750   | 100.0 | 16.3  | 20.2                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 1.1   | 0       | 0.0   | 0.2   | 0    | 0.0   | 10.3  | 0       | 0.0   | 29.0  | 7.5                          |
| Total                                                                                                                                  | 1                                | 100.0 | 100.0 | 11,593  | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 7,750   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                    | 0                                | 0.0   | 2.2   | 0       | 0.0   | 2.6   | 1    | 1.8   | 2.9   | 111     | 0.8   | 1.7   | 2.5                          |
| Moderate                                                                                                                               | 16                               | 28.1  | 15.1  | 1,902   | 10.2  | 10.6  | 12   | 21.4  | 15.7  | 1,162   | 8.1   | 12.7  | 14.1                         |
| Middle                                                                                                                                 | 22                               | 38.6  | 43.4  | 13,952  | 75.0  | 40.2  | 21   | 37.5  | 48.3  | 2,411   | 16.8  | 42.8  | 47.8                         |
| Upper                                                                                                                                  | 19                               | 33.3  | 39.2  | 2,750   | 14.8  | 46.4  | 21   | 37.5  | 32.8  | 10,617  | 74.2  | 38.4  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 1    | 1.8   | 0.2   | 11      | 0.1   | 4.5   | 0.2                          |
| Total                                                                                                                                  | 57                               | 100.0 | 100.0 | 18,604  | 100.0 | 100.0 | 56   | 100.0 | 100.0 | 14,312  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D124B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lansing-East Lansing Metropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                          | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                        | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                        | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                        | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 1.6   | 0       | 0.0   | 1.2   | 0    | 0.0   | 1.2   | 0       | 0.0   | 0.8   | 2.5                          |
| Moderate                                                                                                                               | 1                                | 10.0  | 10.5  | 88      | 7.5   | 6.5   | 1    | 10.0  | 9.0   | 100     | 7.1   | 5.8   | 14.1                         |
| Middle                                                                                                                                 | 4                                | 40.0  | 40.4  | 474     | 40.3  | 37.9  | 5    | 50.0  | 45.0  | 623     | 43.9  | 40.2  | 47.8                         |
| Upper                                                                                                                                  | 5                                | 50.0  | 47.3  | 613     | 52.2  | 54.2  | 3    | 30.0  | 44.7  | 684     | 48.2  | 53.1  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 1    | 10.0  | 0.1   | 11      | 0.8   | 0.0   | 0.2                          |
| Tract-Unk                                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                  | 10                               | 100.0 | 100.0 | 1,175   | 100.0 | 100.0 | 10   | 100.0 | 100.0 | 1,418   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.9   | 2.5                          |
| Moderate                                                                                                                               | 0                                | 0.0   | 13.1  | 0       | 0.0   | 6.3   | 0    | 0.0   | 9.2   | 0       | 0.0   | 6.9   | 14.1                         |
| Middle                                                                                                                                 | 0                                | 0.0   | 51.6  | 0       | 0.0   | 44.1  | 0    | 0.0   | 56.2  | 0       | 0.0   | 50.5  | 47.8                         |
| Upper                                                                                                                                  | 0                                | 0.0   | 34.7  | 0       | 0.0   | 49.2  | 0    | 0.0   | 33.7  | 0       | 0.0   | 41.8  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                          |
| Tract-Unk                                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                  | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 7.5   | 0       | 0.0   | 3.0   | 0    | 0.0   | 8.8   | 0       | 0.0   | 3.2   | 2.5                          |
| Moderate                                                                                                                               | 0                                | 0.0   | 22.6  | 0       | 0.0   | 14.8  | 0    | 0.0   | 18.8  | 0       | 0.0   | 10.3  | 14.1                         |
| Middle                                                                                                                                 | 0                                | 0.0   | 51.9  | 0       | 0.0   | 56.5  | 0    | 0.0   | 50.0  | 0       | 0.0   | 47.1  | 47.8                         |
| Upper                                                                                                                                  | 0                                | 0.0   | 17.9  | 0       | 0.0   | 25.8  | 0    | 0.0   | 22.5  | 0       | 0.0   | 39.4  | 35.4                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                          |
| Tract-Unk                                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                  | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |



Table D125A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lansing-East Lansing Metropolitan |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                               | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                               | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                           |                          |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                        | 0.0   | 2.8   | 0       | 0.0   | 1.3   | 2.3                          |
| Moderate                                                                                                                      | 2                        | 33.3  | 18.9  | 141     | 16.3  | 11.7  | 16.9                         |
| Middle                                                                                                                        | 2                        | 33.3  | 44.0  | 334     | 38.6  | 41.8  | 45.3                         |
| Upper                                                                                                                         | 2                        | 33.3  | 34.1  | 390     | 45.1  | 44.8  | 35.4                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0.1                          |
| Total                                                                                                                         | 6                        | 100.0 | 100.0 | 865     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                        | 0.0   | 0.8   | 0       | 0.0   | 0.4   | 2.3                          |
| Moderate                                                                                                                      | 2                        | 14.3  | 8.2   | 201     | 13.1  | 4.6   | 16.9                         |
| Middle                                                                                                                        | 4                        | 28.6  | 42.2  | 508     | 33.2  | 38.4  | 45.3                         |
| Upper                                                                                                                         | 8                        | 57.1  | 48.7  | 823     | 53.7  | 56.4  | 35.4                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                                                                         | 14                       | 100.0 | 100.0 | 1,532   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                        |                          |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                        | 0.0   | 1.6   | 0       | 0.0   | 1.3   | 2.3                          |
| Moderate                                                                                                                      | 1                        | 14.3  | 12.3  | 88      | 21.3  | 8.1   | 16.9                         |
| Middle                                                                                                                        | 3                        | 42.9  | 41.8  | 184     | 44.6  | 36.5  | 45.3                         |
| Upper                                                                                                                         | 3                        | 42.9  | 44.1  | 141     | 34.1  | 53.8  | 35.4                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 0.1                          |
| Total                                                                                                                         | 7                        | 100.0 | 100.0 | 413     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                             |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                           | 0                        | 0.0   | 14.1  | 0       | 0.0   | 12.8  |                              |
| Moderate                                                                                                                      | 0                        | 0.0   | 25.4  | 0       | 0.0   | 10.4  | 21.7                         |
| Middle                                                                                                                        | 0                        | 0.0   | 43.7  | 0       | 0.0   | 49.5  | 33.2                         |
| Upper                                                                                                                         | 0                        | 0.0   | 16.9  | 0       | 0.0   | 27.3  | 28.2                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2.2                          |
| Total                                                                                                                         | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                     |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                           | 0                        | 0.0   | 1.6   | 0       | 0.0   | 1.7   |                              |
| Moderate                                                                                                                      | 7                        | 21.2  | 12.6  | 557     | 17.1  | 7.7   | 16.9                         |
| Middle                                                                                                                        | 10                       | 30.3  | 42.6  | 1,086   | 33.4  | 40.4  | 45.3                         |
| Upper                                                                                                                         | 16                       | 48.5  | 42.9  | 1,609   | 49.5  | 49.9  | 35.4                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.1                          |
| Total                                                                                                                         | 33                       | 100.0 | 100.0 | 3,252   | 100.0 | 100.0 | 100.0                        |

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D125B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lansing-East Lansing Metropolitan                               |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.9   | 0       | 0.0   | 0.5   | 2.3                          |
| Moderate                                                                                                                                                    | 2                        | 33.3  | 10.9  | 127     | 28.7  | 6.6   | 16.9                         |
| Middle                                                                                                                                                      | 1                        | 16.7  | 35.4  | 60      | 13.6  | 29.3  | 45.3                         |
| Upper                                                                                                                                                       | 3                        | 50.0  | 52.5  | 255     | 57.7  | 63.3  | 35.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 6                        | 100.0 | 100.0 | 442     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.3   | 0       | 0.0   | 1.4   | 2.3                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 13.8  | 0       | 0.0   | 11.1  | 16.9                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 43.2  | 0       | 0.0   | 41.2  | 45.3                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 40.5  | 0       | 0.0   | 46.2  | 35.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 4.3   | 0       | 0.0   | 2.7   | 2.3                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 25.5  | 0       | 0.0   | 16.1  | 16.9                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 42.9  | 0       | 0.0   | 43.4  | 45.3                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 27.3  | 0       | 0.0   | 37.9  | 35.4                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Tract-Unk                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

Table D126

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lansing-East Lansing Metropolitan                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                   | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                               | 6                                | 6.6   | 6.8   | 2,382   | 15.1  | 10.2  | 4    | 5.7   | 4.7   | 955     | 6.6   | 7.0   | 5.4                      |
| Moderate                                                                          | 26                               | 28.6  | 18.2  | 4,108   | 26.1  | 17.4  | 19   | 27.1  | 15.6  | 3,845   | 26.7  | 15.9  | 19.6                     |
| Middle                                                                            | 31                               | 34.1  | 34.2  | 4,959   | 31.5  | 30.1  | 28   | 40.0  | 41.4  | 5,232   | 36.3  | 42.2  | 43.1                     |
| Upper                                                                             | 24                               | 26.4  | 39.0  | 4,142   | 26.3  | 40.0  | 19   | 27.1  | 36.0  | 4,379   | 30.4  | 32.9  | 29.0                     |
| Unknown                                                                           | 4                                | 4.4   | 1.5   | 146     | 0.9   | 2.2   | 0    | 0.0   | 1.8   | 0       | 0.0   | 1.9   | 3.0                      |
| Total                                                                             | 91                               | 100.0 | 100.0 | 15,737  | 100.0 | 100.0 | 70   | 100.0 | 100.0 | 14,411  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D127

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Lansing-East Lansing Metropolitan |                          |       |       |         |       |       |                          |
|--------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                  | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                            | 18                       | 10.3  | 7.7   | 5,346   | 21.4  | 11.5  | 7.2                      |
| Moderate                                                                                                                       | 66                       | 37.7  | 17.9  | 7,967   | 31.9  | 20.0  | 19.5                     |
| Middle                                                                                                                         | 43                       | 24.6  | 33.5  | 5,510   | 22.1  | 30.2  | 36.7                     |
| Upper                                                                                                                          | 47                       | 26.9  | 39.3  | 6,140   | 24.6  | 36.9  | 34.4                     |
| Unknown                                                                                                                        | 1                        | 0.6   | 1.3   | 11      | 0.0   | 1.1   | 2.2                      |
| Total                                                                                                                          | 175                      | 100.0 | 100.0 | 24,974  | 100.0 | 100.0 | 100.0                    |

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table D128A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Lansing-East Lansing Metropolitan                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 13.0  | 0       | 0.0   | 6.9   | 5    | 45.5  | 13.1  | 591     | 43.4  | 6.9   | 20.0                              |
| Moderate                                                                     | 3                                | 23.1  | 25.9  | 314     | 13.2  | 19.7  | 4    | 36.4  | 25.0  | 507     | 37.2  | 19.6  | 17.0                              |
| Middle                                                                       | 4                                | 30.8  | 23.0  | 555     | 23.4  | 23.1  | 2    | 18.2  | 21.5  | 264     | 19.4  | 21.7  | 21.8                              |
| Upper                                                                        | 5                                | 38.5  | 27.7  | 1,398   | 59.0  | 40.1  | 0    | 0.0   | 26.1  | 0       | 0.0   | 39.7  | 41.2                              |
| Unknown                                                                      | 1                                | 7.7   | 10.4  | 103     | 4.3   | 10.3  | 0    | 0.0   | 14.3  | 0       | 0.0   | 12.1  | 0.0                               |
| Total                                                                        | 13                               | 100.0 | 100.0 | 2,370   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 1,362   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 4                                | 18.2  | 6.8   | 366     | 14.8  | 3.9   | 5    | 25.0  | 13.2  | 408     | 14.6  | 8.2   | 20.0                              |
| Moderate                                                                     | 3                                | 13.6  | 20.6  | 308     | 12.5  | 15.1  | 5    | 25.0  | 28.7  | 688     | 24.7  | 24.3  | 17.0                              |
| Middle                                                                       | 5                                | 22.7  | 25.2  | 377     | 15.3  | 23.1  | 3    | 15.0  | 25.3  | 330     | 11.8  | 25.5  | 21.8                              |
| Upper                                                                        | 7                                | 31.8  | 34.7  | 1,192   | 48.3  | 44.3  | 6    | 30.0  | 25.0  | 1,226   | 43.9  | 33.7  | 41.2                              |
| Unknown                                                                      | 3                                | 13.6  | 12.7  | 227     | 9.2   | 13.7  | 1    | 5.0   | 7.8   | 139     | 5.0   | 8.3   | 0.0                               |
| Total                                                                        | 22                               | 100.0 | 100.0 | 2,470   | 100.0 | 100.0 | 20   | 100.0 | 100.0 | 2,791   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 18.2  | 9.7   | 135     | 13.6  | 7.8   | 3    | 21.4  | 12.2  | 255     | 25.7  | 8.4   | 20.0                              |
| Moderate                                                                     | 3                                | 27.3  | 22.4  | 288     | 28.9  | 19.2  | 0    | 0.0   | 22.7  | 0       | 0.0   | 19.4  | 17.0                              |
| Middle                                                                       | 1                                | 9.1   | 25.5  | 42      | 4.2   | 23.3  | 2    | 14.3  | 28.8  | 100     | 10.1  | 27.9  | 21.8                              |
| Upper                                                                        | 4                                | 36.4  | 40.4  | 476     | 47.8  | 46.3  | 8    | 57.1  | 34.6  | 620     | 62.6  | 42.0  | 41.2                              |
| Unknown                                                                      | 1                                | 9.1   | 2.0   | 55      | 5.5   | 3.5   | 1    | 7.1   | 1.7   | 16      | 1.6   | 2.3   | 0.0                               |
| Total                                                                        | 11                               | 100.0 | 100.0 | 996     | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 991     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 6                                | 10.7  | 9.2   | 501     | 7.1   | 5.2   | 14   | 25.5  | 12.2  | 1,288   | 19.6  | 7.1   | 20.0                              |
| Moderate                                                                     | 12                               | 21.4  | 22.4  | 1,165   | 16.6  | 17.1  | 12   | 21.8  | 25.1  | 1,453   | 22.1  | 20.4  | 17.0                              |
| Middle                                                                       | 12                               | 21.4  | 24.2  | 1,019   | 14.5  | 23.0  | 10   | 18.2  | 23.6  | 1,010   | 15.4  | 22.8  | 21.8                              |
| Upper                                                                        | 21                               | 37.5  | 33.0  | 3,941   | 56.2  | 42.7  | 16   | 29.1  | 28.4  | 2,506   | 38.2  | 39.1  | 41.2                              |
| Unknown                                                                      | 5                                | 8.9   | 11.2  | 385     | 5.5   | 12.0  | 3    | 5.5   | 10.7  | 305     | 4.6   | 10.6  | 0.0                               |
| Total                                                                        | 56                               | 100.0 | 100.0 | 7,011   | 100.0 | 100.0 | 55   | 100.0 | 100.0 | 6,562   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D128B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lansing-East Lansing Metropolitan                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 6.6   | 0       | 0.0   | 5.0   | 1    | 10.0  | 6.5   | 34      | 2.4   | 4.1   | 20.0                              |
| Moderate                                                                                                                                                    | 3                                | 30.0  | 17.1  | 255     | 21.7  | 13.4  | 3    | 30.0  | 19.6  | 258     | 18.2  | 13.9  | 17.0                              |
| Middle                                                                                                                                                      | 2                                | 20.0  | 24.1  | 45      | 3.8   | 21.6  | 3    | 30.0  | 27.8  | 316     | 22.3  | 24.1  | 21.8                              |
| Upper                                                                                                                                                       | 5                                | 50.0  | 51.8  | 875     | 74.5  | 59.6  | 2    | 20.0  | 45.5  | 660     | 46.5  | 57.6  | 41.2                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 1    | 10.0  | 0.6   | 150     | 10.6  | 0.3   | 0.0                               |
| Total                                                                                                                                                       | 10                               | 100.0 | 100.0 | 1,175   | 100.0 | 100.0 | 10   | 100.0 | 100.0 | 1,418   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 8.0   | 0       | 0.0   | 4.2   | 0    | 0.0   | 10.4  | 0       | 0.0   | 6.7   | 20.0                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 29.1  | 0       | 0.0   | 22.1  | 0    | 0.0   | 26.1  | 0       | 0.0   | 22.2  | 17.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 29.1  | 0       | 0.0   | 27.5  | 0    | 0.0   | 27.3  | 0       | 0.0   | 21.1  | 21.8                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 28.6  | 0       | 0.0   | 41.6  | 0    | 0.0   | 34.5  | 0       | 0.0   | 48.7  | 41.2                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 5.2   | 0       | 0.0   | 4.6   | 0    | 0.0   | 1.6   | 0       | 0.0   | 1.3   | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.0                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.8                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.2                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D129A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lansing-East Lansing Metropolitan |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                           | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                                                                       | 1                        | 16.7  | 13.8  | 41      | 4.7   | 7.7   | 20.5                              |
| Moderate                                                                                                                  | 3                        | 50.0  | 28.3  | 410     | 47.4  | 22.6  | 17.1                              |
| Middle                                                                                                                    | 2                        | 33.3  | 22.9  | 414     | 47.9  | 23.2  | 20.3                              |
| Upper                                                                                                                     | 0                        | 0.0   | 26.9  | 0       | 0.0   | 38.8  | 42.2                              |
| Unknown                                                                                                                   | 0                        | 0.0   | 8.0   | 0       | 0.0   | 7.6   | 0.0                               |
| Total                                                                                                                     | 6                        | 100.0 | 100.0 | 865     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                                       | 4                        | 28.6  | 5.7   | 329     | 21.5  | 3.0   | 20.5                              |
| Moderate                                                                                                                  | 4                        | 28.6  | 18.1  | 398     | 26.0  | 12.8  | 17.1                              |
| Middle                                                                                                                    | 1                        | 7.1   | 24.5  | 190     | 12.4  | 21.7  | 20.3                              |
| Upper                                                                                                                     | 3                        | 21.4  | 39.4  | 323     | 21.1  | 49.3  | 42.2                              |
| Unknown                                                                                                                   | 2                        | 14.3  | 12.2  | 292     | 19.1  | 13.2  | 0.0                               |
| Total                                                                                                                     | 14                       | 100.0 | 100.0 | 1,532   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                                       | 1                        | 14.3  | 11.5  | 60      | 14.5  | 6.6   | 20.5                              |
| Moderate                                                                                                                  | 1                        | 14.3  | 20.7  | 66      | 16.0  | 18.7  | 17.1                              |
| Middle                                                                                                                    | 2                        | 28.6  | 21.8  | 75      | 18.2  | 20.7  | 20.3                              |
| Upper                                                                                                                     | 3                        | 42.9  | 43.8  | 212     | 51.3  | 51.0  | 42.2                              |
| Unknown                                                                                                                   | 0                        | 0.0   | 2.2   | 0       | 0.0   | 3.0   | 0.0                               |
| Total                                                                                                                     | 7                        | 100.0 | 100.0 | 413     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                       | 8                        | 24.2  | 8.8   | 485     | 14.9  | 4.8   | 20.5                              |
| Moderate                                                                                                                  | 10                       | 30.3  | 21.4  | 989     | 30.4  | 16.4  | 17.1                              |
| Middle                                                                                                                    | 5                        | 15.2  | 23.5  | 679     | 20.9  | 22.0  | 20.3                              |
| Upper                                                                                                                     | 8                        | 24.2  | 34.9  | 807     | 24.8  | 45.0  | 42.2                              |
| Unknown                                                                                                                   | 2                        | 6.1   | 11.4  | 292     | 9.0   | 11.7  | 0.0                               |
| Total                                                                                                                     | 33                       | 100.0 | 100.0 | 3,252   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                            |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                   |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                            |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                 |                          |       |       |         |       |       |                                   |

Table D129B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lansing-East Lansing Metropolitan                                   |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | #%    | #%    | \$(000) | %     | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 2                        | 33.3  | 7.0   | 55      | 12.4  | 5.1   | 20.5                              |
| Moderate                                                                                                                                                    | 2                        | 33.3  | 15.1  | 115     | 26.0  | 12.5  | 17.1                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 25.4  | 0       | 0.0   | 21.7  | 20.3                              |
| Upper                                                                                                                                                       | 2                        | 33.3  | 51.9  | 272     | 61.5  | 59.8  | 42.2                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.9   | 0.0                               |
| Total                                                                                                                                                       | 6                        | 100.0 | 100.0 | 442     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 10.6  | 0       | 0.0   | 6.9   | 20.5                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 22.1  | 0       | 0.0   | 16.1  | 17.1                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 25.1  | 0       | 0.0   | 21.1  | 20.3                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 39.7  | 0       | 0.0   | 52.8  | 42.2                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 2.5   | 0       | 0.0   | 3.1   | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.5                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 17.1                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.0   | 20.3                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 42.2                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 99.5  | 0       | 0.0   | 99.9  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

Table D130

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|
| Assessment Area: Lansing-East Lansing Metropolitan                                 |                                  |       |       |         |       |       |      |       |       |         |       |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |
|                                                                                    | Bank                             |       |       | Agg     |       |       | Bank |       |       | Agg     |       |
|                                                                                    | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |
| \$1 Million or Less                                                                | 30                               | 33.0  | 47.8  | 2,815   | 17.9  | 31.5  | 29   | 41.4  | 49.4  | 2,916   | 20.2  |
| Over \$1 Million                                                                   | 39                               | 42.9  |       | 9,714   | 61.7  |       | 36   | 51.4  |       | 9,800   | 68.0  |
| Revenue Unknown                                                                    | 22                               | 24.2  |       | 3,208   | 20.4  |       | 5    | 7.1   |       | 1,695   | 11.8  |
| Total                                                                              | 91                               | 100.0 |       | 15,737  | 100.0 |       | 70   | 100.0 |       | 14,411  | 100.0 |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |
| \$100,000 or Less                                                                  | 56                               | 61.5  | 88.2  | 2,868   | 18.2  | 26.5  | 37   | 52.9  | 92.4  | 2,154   | 14.9  |
| \$100,001 - \$250,000                                                              | 18                               | 19.8  | 6.6   | 3,212   | 20.4  | 20.9  | 19   | 27.1  | 4.2   | 3,545   | 24.6  |
| \$250,001 - \$1 Million                                                            | 17                               | 18.7  | 5.2   | 9,657   | 61.4  | 52.6  | 14   | 20.0  | 3.4   | 8,712   | 60.5  |
| Total                                                                              | 91                               | 100.0 | 100.0 | 15,737  | 100.0 | 100.0 | 70   | 100.0 | 100.0 | 14,411  | 100.0 |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |
| \$100,000 or Less                                                                  | 24                               | 80.0  |       | 1,216   | 43.2  |       | 21   | 72.4  |       | 1,301   | 44.6  |
| \$100,001 - \$250,000                                                              | 4                                | 13.3  |       | 649     | 23.1  |       | 7    | 24.1  |       | 1,297   | 44.5  |
| \$250,001 - \$1 Million                                                            | 2                                | 6.7   |       | 950     | 33.7  |       | 1    | 3.4   |       | 318     | 10.9  |
| Total                                                                              | 30                               | 100.0 |       | 2,815   | 100.0 |       | 29   | 100.0 |       | 2,916   | 100.0 |

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D131

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lansing-East Lansing Metropolitan                        |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | \$%   |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 88                       | 50.3  | 41.5  | 7,248   | 29.0  | 26.3  | 90.4                     |
| Over \$1 Million                                                          | 55                       | 31.4  |       | 15,592  | 62.4  |       | 8.5                      |
| Revenue Unknown                                                           | 32                       | 18.3  |       | 2,134   | 8.5   |       | 1.1                      |
| Total                                                                     | 175                      | 100.0 |       | 24,974  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 118                      | 67.4  | 82.9  | 4,369   | 17.5  | 25.1  |                          |
| \$100,001 - \$250,000                                                     | 30                       | 17.1  | 9.9   | 4,943   | 19.8  | 23.0  |                          |
| \$250,001 - \$1 Million                                                   | 27                       | 15.4  | 7.2   | 15,662  | 62.7  | 52.0  |                          |
| Total                                                                     | 175                      | 100.0 | 100.0 | 24,974  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 72                       | 81.8  |       | 2,719   | 37.5  |       |                          |
| \$100,001 - \$250,000                                                     | 10                       | 11.4  |       | 1,489   | 20.5  |       |                          |
| \$250,001 - \$1 Million                                                   | 6                        | 6.8   |       | 3,040   | 41.9  |       |                          |
| Total                                                                     | 88                       | 100.0 |       | 7,248   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |



Table D132

| 2022 Combined Demographics<br>Assessment Area: Midland MSA                                                                                                                                |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 1                         | 4.8                   | 491                                | 2.1       | 101                                                | 20.6      | 4,561                     | 19.8      |
| Moderate                                                                                                                                                                                  | 4                         | 19.0                  | 3,812                              | 16.5      | 568                                                | 14.9      | 4,183                     | 18.1      |
| Middle                                                                                                                                                                                    | 12                        | 57.1                  | 12,940                             | 56.1      | 730                                                | 5.6       | 5,081                     | 22.0      |
| Upper                                                                                                                                                                                     | 4                         | 19.0                  | 5,814                              | 25.2      | 267                                                | 4.6       | 9,232                     | 40.0      |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 21                        | 100.0                 | 23,057                             | 100.0     | 1,666                                              | 7.2       | 23,057                    | 100.0     |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                                                                                       | 1,029                     | 573                   | 2.2                                | 55.7      | 346                                                | 33.6      | 110                       | 10.7      |
| Moderate                                                                                                                                                                                  | 7,637                     | 4,362                 | 16.5                               | 57.1      | 2,403                                              | 31.5      | 872                       | 11.4      |
| Middle                                                                                                                                                                                    | 19,870                    | 15,590                | 58.9                               | 78.5      | 2,829                                              | 14.2      | 1,451                     | 7.3       |
| Upper                                                                                                                                                                                     | 8,529                     | 5,941                 | 22.4                               | 69.7      | 2,209                                              | 25.9      | 379                       | 4.4       |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 37,065                    | 26,466                | 100.0                              | 71.4      | 7,787                                              | 21.0      | 2,812                     | 7.6       |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 184                       | 5.8                   | 131                                | 4.6       | 52                                                 | 19.7      | 1                         | 2.9       |
| Moderate                                                                                                                                                                                  | 663                       | 20.9                  | 600                                | 20.8      | 53                                                 | 20.1      | 10                        | 28.6      |
| Middle                                                                                                                                                                                    | 1,439                     | 45.3                  | 1,317                              | 45.7      | 103                                                | 39.0      | 19                        | 54.3      |
| Upper                                                                                                                                                                                     | 892                       | 28.1                  | 831                                | 28.9      | 56                                                 | 21.2      | 5                         | 14.3      |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 3,178                     | 100.0                 | 2,879                              | 100.0     | 264                                                | 100.0     | 35                        | 100.0     |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 90.6      |                                                    | 8.3       |                           | 1.1       |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                                                                                           |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                                                                                       | 1                         | 1.1                   | 1                                  | 1.1       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                                                                                  | 17                        | 18.7                  | 17                                 | 19.1      | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                                                                                    | 59                        | 64.8                  | 57                                 | 64.0      | 2                                                  | 100.0     | 0                         | 0.0       |
| Upper                                                                                                                                                                                     | 14                        | 15.4                  | 14                                 | 15.7      | 0                                                  | 0.0       | 0                         | 0.0       |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                                                                                  | 91                        | 100.0                 | 89                                 | 100.0     | 2                                                  | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 97.8      |                                                    | 2.2       |                           | 0.0       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |           |                                                    |           |                           |           |

Table D133

| 2021 Combined Demographics<br>Assessment Area: Midland MSA                                                                                                                                |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1                         | 5.3                   | 599                                | 2.6          | 182                                                | 30.4         | 4,635                     | 20.1         |
| Moderate                                                                                                                                                                                  | 4                         | 21.1                  | 4,364                              | 18.9         | 620                                                | 14.2         | 4,073                     | 17.7         |
| Middle                                                                                                                                                                                    | 9                         | 47.4                  | 9,968                              | 43.2         | 831                                                | 8.3          | 4,782                     | 20.7         |
| Upper                                                                                                                                                                                     | 5                         | 26.3                  | 8,135                              | 35.3         | 469                                                | 5.8          | 9,576                     | 41.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>19</b>                 | <b>100.0</b>          | <b>23,066</b>                      | <b>100.0</b> | <b>2,102</b>                                       | <b>9.1</b>   | <b>23,066</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 1,089                     | 436                   | 1.7                                | 40.0         | 597                                                | 54.8         | 56                        | 5.1          |
| Moderate                                                                                                                                                                                  | 7,588                     | 4,423                 | 17.5                               | 58.3         | 2,571                                              | 33.9         | 594                       | 7.8          |
| Middle                                                                                                                                                                                    | 15,259                    | 11,325                | 44.7                               | 74.2         | 2,607                                              | 17.1         | 1,327                     | 8.7          |
| Upper                                                                                                                                                                                     | 12,259                    | 9,153                 | 36.1                               | 74.7         | 2,505                                              | 20.4         | 601                       | 4.9          |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>36,195</b>             | <b>25,337</b>         | <b>100.0</b>                       | <b>70.0</b>  | <b>8,280</b>                                       | <b>22.9</b>  | <b>2,578</b>              | <b>7.1</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 185                       | 5.7                   | 132                                | 4.5          | 51                                                 | 19.5         | 2                         | 5.1          |
| Moderate                                                                                                                                                                                  | 703                       | 21.7                  | 634                                | 21.6         | 58                                                 | 22.1         | 11                        | 28.2         |
| Middle                                                                                                                                                                                    | 996                       | 30.8                  | 915                                | 31.2         | 64                                                 | 24.4         | 17                        | 43.6         |
| Upper                                                                                                                                                                                     | 1,352                     | 41.8                  | 1,254                              | 42.7         | 89                                                 | 34.0         | 9                         | 23.1         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,236</b>              | <b>100.0</b>          | <b>2,935</b>                       | <b>100.0</b> | <b>262</b>                                         | <b>100.0</b> | <b>39</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>90.7</b>  |                                                    | <b>8.1</b>   |                           | <b>1.2</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 17                        | 18.3                  | 17                                 | 18.7         | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 56                        | 60.2                  | 54                                 | 59.3         | 2                                                  | 100.0        | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 20                        | 21.5                  | 20                                 | 22.0         | 0                                                  | 0.0          | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>93</b>                 | <b>100.0</b>          | <b>91</b>                          | <b>100.0</b> | <b>2</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>97.8</b>  |                                                    | <b>2.2</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D134

| 2020 Combined Demographics<br>Assessment Area: Midland MSA                                                                                                                                |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 1                         | 5.3                   | 599                                | 2.6          | 182                                                | 30.4         | 4,635                     | 20.1         |
| Moderate                                                                                                                                                                                  | 4                         | 21.1                  | 4,364                              | 18.9         | 620                                                | 14.2         | 4,073                     | 17.7         |
| Middle                                                                                                                                                                                    | 9                         | 47.4                  | 9,968                              | 43.2         | 831                                                | 8.3          | 4,782                     | 20.7         |
| Upper                                                                                                                                                                                     | 5                         | 26.3                  | 8,135                              | 35.3         | 469                                                | 5.8          | 9,576                     | 41.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>19</b>                 | <b>100.0</b>          | <b>23,066</b>                      | <b>100.0</b> | <b>2,102</b>                                       | <b>9.1</b>   | <b>23,066</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 1,089                     | 436                   | 1.7                                | 40.0         | 597                                                | 54.8         | 56                        | 5.1          |
| Moderate                                                                                                                                                                                  | 7,588                     | 4,423                 | 17.5                               | 58.3         | 2,571                                              | 33.9         | 594                       | 7.8          |
| Middle                                                                                                                                                                                    | 15,259                    | 11,325                | 44.7                               | 74.2         | 2,607                                              | 17.1         | 1,327                     | 8.7          |
| Upper                                                                                                                                                                                     | 12,259                    | 9,153                 | 36.1                               | 74.7         | 2,505                                              | 20.4         | 601                       | 4.9          |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>36,195</b>             | <b>25,337</b>         | <b>100.0</b>                       | <b>70.0</b>  | <b>8,280</b>                                       | <b>22.9</b>  | <b>2,578</b>              | <b>7.1</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 189                       | 5.6                   | 137                                | 4.5          | 50                                                 | 18.7         | 2                         | 4.8          |
| Moderate                                                                                                                                                                                  | 725                       | 21.6                  | 653                                | 21.4         | 60                                                 | 22.4         | 12                        | 28.6         |
| Middle                                                                                                                                                                                    | 1,045                     | 31.1                  | 956                                | 31.3         | 70                                                 | 26.1         | 19                        | 45.2         |
| Upper                                                                                                                                                                                     | 1,401                     | 41.7                  | 1,304                              | 42.8         | 88                                                 | 32.8         | 9                         | 21.4         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,360</b>              | <b>100.0</b>          | <b>3,050</b>                       | <b>100.0</b> | <b>268</b>                                         | <b>100.0</b> | <b>42</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>90.8</b>  |                                                    | <b>8.0</b>   |                           | <b>1.3</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 19                        | 19.0                  | 19                                 | 19.4         | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 61                        | 61.0                  | 59                                 | 60.2         | 2                                                  | 100.0        | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 20                        | 20.0                  | 20                                 | 20.4         | 0                                                  | 0.0          | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>100</b>                | <b>100.0</b>          | <b>98</b>                          | <b>100.0</b> | <b>2</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>98.0</b>  |                                                    | <b>2.0</b>   |                           | <b>0.0</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D135A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Midland MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                  | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 0                                | 0.0   | 2.0   | 0       | 0.0   | 1.1   | 0    | 0.0   | 2.8   | 0       | 0.0   | 1.4   | 2.2                          |
| Moderate                                                                                                         | 0                                | 0.0   | 17.0  | 0       | 0.0   | 11.2  | 1    | 100.0 | 19.0  | 150     | 100.0 | 12.9  | 16.5                         |
| Middle                                                                                                           | 1                                | 100.0 | 40.5  | 67      | 100.0 | 38.9  | 0    | 0.0   | 53.2  | 0       | 0.0   | 52.6  | 58.9                         |
| Upper                                                                                                            | 0                                | 0.0   | 40.5  | 0       | 0.0   | 48.8  | 0    | 0.0   | 25.0  | 0       | 0.0   | 33.1  | 22.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                            | 1                                | 100.0 | 100.0 | 67      | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 150     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 1                                | 20.0  | 1.3   | 100     | 20.4  | 0.7   | 0    | 0.0   | 1.7   | 0       | 0.0   | 1.1   | 2.2                          |
| Moderate                                                                                                         | 1                                | 20.0  | 13.8  | 120     | 24.5  | 9.7   | 1    | 25.0  | 20.2  | 84      | 20.7  | 15.6  | 16.5                         |
| Middle                                                                                                           | 2                                | 40.0  | 43.2  | 176     | 35.9  | 41.5  | 3    | 75.0  | 59.8  | 321     | 79.3  | 61.3  | 58.9                         |
| Upper                                                                                                            | 1                                | 20.0  | 41.8  | 94      | 19.2  | 48.1  | 0    | 0.0   | 18.4  | 0       | 0.0   | 22.1  | 22.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                            | 5                                | 100.0 | 100.0 | 490     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 405     | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.8   | 0       | 0.0   | 1.2   | 2.2                          |
| Moderate                                                                                                         | 1                                | 33.3  | 19.2  | 50      | 37.6  | 12.3  | 0    | 0.0   | 10.7  | 0       | 0.0   | 9.0   | 16.5                         |
| Middle                                                                                                           | 1                                | 33.3  | 35.6  | 33      | 24.8  | 39.1  | 2    | 50.0  | 57.6  | 145     | 50.2  | 57.1  | 58.9                         |
| Upper                                                                                                            | 1                                | 33.3  | 45.2  | 50      | 37.6  | 48.6  | 2    | 50.0  | 28.8  | 144     | 49.8  | 32.8  | 22.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                            | 3                                | 100.0 | 100.0 | 133     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 289     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                              | 0                                | 0.0   | 18.2  | 0       | 0.0   | 5.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 3.5                          |
| Moderate                                                                                                         | 0                                | 0.0   | 45.5  | 0       | 0.0   | 24.4  | 0    | 0.0   | 23.5  | 0       | 0.0   | 22.5  | 29.3                         |
| Middle                                                                                                           | 0                                | 0.0   | 9.1   | 0       | 0.0   | 9.8   | 0    | 0.0   | 47.1  | 0       | 0.0   | 35.4  | 27.5                         |
| Upper                                                                                                            | 0                                | 0.0   | 27.3  | 0       | 0.0   | 60.8  | 0    | 0.0   | 29.4  | 0       | 0.0   | 42.1  | 39.6                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                              | 1                                | 7.1   | 1.6   | 100     | 9.3   | 0.9   | 0    | 0.0   | 2.3   | 0       | 0.0   | 1.2   | 2.2                          |
| Moderate                                                                                                         | 4                                | 28.6  | 15.3  | 270     | 25.1  | 10.7  | 2    | 18.2  | 18.6  | 234     | 19.7  | 13.7  | 16.5                         |
| Middle                                                                                                           | 4                                | 28.6  | 41.9  | 276     | 25.7  | 39.9  | 6    | 54.5  | 55.7  | 566     | 47.7  | 54.2  | 58.9                         |
| Upper                                                                                                            | 5                                | 35.7  | 41.2  | 428     | 39.9  | 48.6  | 3    | 27.3  | 23.4  | 386     | 32.5  | 30.8  | 22.4                         |
| Unknown                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                            | 14                               | 100.0 | 100.0 | 1,074   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 1,186   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D135B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Midland MSA                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2.2                          |
| Moderate                                                                                                                                                    | 2                                | 40.0  | 0.0   | 100     | 26.0  | 0.0   | 0    | 0.0   | 8.7   | 0       | 0.0   | 3.1   | 16.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 33.3  | 0       | 0.0   | 42.2  | 1    | 50.0  | 52.2  | 100     | 29.2  | 54.4  | 58.9                         |
| Upper                                                                                                                                                       | 3                                | 60.0  | 66.7  | 284     | 74.0  | 57.8  | 1    | 50.0  | 39.1  | 242     | 70.8  | 42.5  | 22.4                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 5                                | 100.0 | 100.0 | 384     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 342     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.5   | 0       | 0.0   | 1.8   | 2.2                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 12.0  | 0       | 0.0   | 5.4   | 0    | 0.0   | 17.3  | 0       | 0.0   | 14.8  | 16.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 52.0  | 0       | 0.0   | 46.1  | 0    | 0.0   | 55.6  | 0       | 0.0   | 51.0  | 58.9                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 36.0  | 0       | 0.0   | 48.5  | 0    | 0.0   | 24.7  | 0       | 0.0   | 32.4  | 22.4                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 2.2                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 19.2  | 0       | 0.0   | 14.2  | 0    | 0.0   | 18.8  | 0       | 0.0   | 14.3  | 16.5                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 50.0  | 0       | 0.0   | 53.0  | 0    | 0.0   | 75.0  | 0       | 0.0   | 79.1  | 58.9                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 30.8  | 0       | 0.0   | 32.8  | 0    | 0.0   | 6.3   | 0       | 0.0   | 6.6   | 22.4                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D136A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Midland MSA                                            |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.7   | 0       | 0.0   | 0.9   | 1.7                          |
| Moderate                                                                | 0                        | 0.0   | 16.3  | 0       | 0.0   | 10.7  | 17.5                         |
| Middle                                                                  | 1                        | 50.0  | 40.4  | 77      | 30.7  | 38.0  | 44.7                         |
| Upper                                                                   | 1                        | 50.0  | 41.6  | 174     | 69.3  | 50.4  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 251     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.0   | 0       | 0.0   | 0.6   | 1.7                          |
| Moderate                                                                | 0                        | 0.0   | 10.6  | 0       | 0.0   | 7.4   | 17.5                         |
| Middle                                                                  | 0                        | 0.0   | 44.1  | 0       | 0.0   | 40.4  | 44.7                         |
| Upper                                                                   | 1                        | 100.0 | 44.3  | 100     | 100.0 | 51.6  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 1                        | 100.0 | 100.0 | 100     | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.2   | 0       | 0.0   | 0.4   | 1.7                          |
| Moderate                                                                | 0                        | 0.0   | 10.5  | 0       | 0.0   | 10.2  | 17.5                         |
| Middle                                                                  | 2                        | 66.7  | 48.8  | 250     | 69.4  | 42.5  | 44.7                         |
| Upper                                                                   | 1                        | 33.3  | 39.5  | 110     | 30.6  | 46.8  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 3                        | 100.0 | 100.0 | 360     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                | 0                        | 0.0   | 33.3  | 0       | 0.0   | 18.0  | 31.1                         |
| Middle                                                                  | 0                        | 0.0   | 40.0  | 0       | 0.0   | 34.3  | 25.5                         |
| Upper                                                                   | 0                        | 0.0   | 26.7  | 0       | 0.0   | 47.7  | 40.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 1.3   | 0       | 0.0   | 0.7   |                              |
| Moderate                                                                | 0                        | 0.0   | 13.1  | 0       | 0.0   | 9.0   | 17.5                         |
| Middle                                                                  | 4                        | 57.1  | 42.9  | 383     | 49.9  | 39.4  | 44.7                         |
| Upper                                                                   | 3                        | 42.9  | 42.7  | 384     | 50.1  | 50.8  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 7                        | 100.0 | 100.0 | 767     | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D136B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Midland MSA                                            |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.7                          |
| Moderate                                                                | 0                        | 0.0   | 14.8  | 0       | 0.0   | 9.7   | 17.5                         |
| Middle                                                                  | 1                        | 100.0 | 29.6  | 56      | 100.0 | 33.0  | 44.7                         |
| Upper                                                                   | 0                        | 0.0   | 55.6  | 0       | 0.0   | 57.3  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 1                        | 100.0 | 100.0 | 56      | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1.7                          |
| Moderate                                                                | 0                        | 0.0   | 11.1  | 0       | 0.0   | 3.8   | 17.5                         |
| Middle                                                                  | 0                        | 0.0   | 48.1  | 0       | 0.0   | 37.5  | 44.7                         |
| Upper                                                                   | 0                        | 0.0   | 40.7  | 0       | 0.0   | 58.7  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.5   | 0       | 0.0   | 1.2   | 1.7                          |
| Moderate                                                                | 0                        | 0.0   | 12.3  | 0       | 0.0   | 9.8   | 17.5                         |
| Middle                                                                  | 0                        | 0.0   | 61.5  | 0       | 0.0   | 55.7  | 44.7                         |
| Upper                                                                   | 0                        | 0.0   | 24.6  | 0       | 0.0   | 33.3  | 36.1                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

**Table D137**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Midland MSA                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 5                                | 26.3  | 6.5   | 933     | 36.9  | 18.1  | 3    | 25.0  | 4.6   | 890     | 43.0  | 12.0  | 5.8                      |
| Moderate                                                                                                                                                                                  | 2                                | 10.5  | 22.4  | 235     | 9.3   | 21.0  | 1    | 8.3   | 18.7  | 75      | 3.6   | 16.8  | 20.9                     |
| Middle                                                                                                                                                                                    | 6                                | 31.6  | 31.9  | 1,017   | 40.3  | 25.8  | 7    | 58.3  | 49.0  | 959     | 46.3  | 35.2  | 45.3                     |
| Upper                                                                                                                                                                                     | 6                                | 31.6  | 38.8  | 341     | 13.5  | 35.1  | 1    | 8.3   | 27.6  | 147     | 7.1   | 36.0  | 28.1                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 19                               | 100.0 | 100.0 | 2,526   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 2,071   | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D138**

| Distribution of 2020 Small Business Lending by Income Level of Geography |                          |       |       |         |       |       |                          |
|--------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Midland MSA                                             |                          |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                            | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                          | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                      | 5                        | 17.9  | 7.2   | 977     | 33.7  | 14.0  | 5.6                      |
| Moderate                                                                 | 1                        | 3.6   | 22.7  | 75      | 2.6   | 24.1  | 21.6                     |
| Middle                                                                   | 9                        | 32.1  | 28.6  | 695     | 24.0  | 18.8  | 31.1                     |
| Upper                                                                    | 13                       | 46.4  | 41.3  | 1,153   | 39.8  | 43.1  | 41.7                     |
| Unknown                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                    | 28                       | 100.0 | 100.0 | 2,900   | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data                                           |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                               |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                  |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.           |                          |       |       |         |       |       |                          |



Table D139A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Midland MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 11.0  | 0       | 0.0   | 5.6   | 0    | 0.0   | 15.0  | 0       | 0.0   | 8.0   | 19.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 19.2  | 0       | 0.0   | 13.6  | 0    | 0.0   | 24.8  | 0       | 0.0   | 18.4  | 18.1                              |
| Middle                                                                                                       | 1                                | 100.0 | 23.0  | 67      | 100.0 | 20.6  | 1    | 100.0 | 20.9  | 150     | 100.0 | 21.3  | 22.0                              |
| Upper                                                                                                        | 0                                | 0.0   | 35.0  | 0       | 0.0   | 49.6  | 0    | 0.0   | 24.6  | 0       | 0.0   | 39.3  | 40.0                              |
| Unknown                                                                                                      | 0                                | 0.0   | 11.8  | 0       | 0.0   | 10.6  | 0    | 0.0   | 14.7  | 0       | 0.0   | 13.1  | 0.0                               |
| Total                                                                                                        | 1                                | 100.0 | 100.0 | 67      | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 150     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 1                                | 20.0  | 7.8   | 100     | 20.4  | 4.2   | 2    | 50.0  | 18.8  | 159     | 39.3  | 11.7  | 19.8                              |
| Moderate                                                                                                     | 2                                | 40.0  | 15.9  | 179     | 36.5  | 10.8  | 0    | 0.0   | 24.1  | 0       | 0.0   | 21.2  | 18.1                              |
| Middle                                                                                                       | 0                                | 0.0   | 22.5  | 0       | 0.0   | 19.0  | 0    | 0.0   | 23.7  | 0       | 0.0   | 23.5  | 22.0                              |
| Upper                                                                                                        | 1                                | 20.0  | 41.2  | 94      | 19.2  | 52.6  | 1    | 25.0  | 24.5  | 200     | 49.4  | 34.9  | 40.0                              |
| Unknown                                                                                                      | 1                                | 20.0  | 12.6  | 117     | 23.9  | 13.4  | 1    | 25.0  | 9.0   | 46      | 11.4  | 8.7   | 0.0                               |
| Total                                                                                                        | 5                                | 100.0 | 100.0 | 490     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 405     | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 6.8   | 0       | 0.0   | 5.1   | 0    | 0.0   | 14.7  | 0       | 0.0   | 10.1  | 19.8                              |
| Moderate                                                                                                     | 1                                | 33.3  | 16.4  | 50      | 37.6  | 12.5  | 1    | 25.0  | 17.5  | 45      | 15.6  | 14.8  | 18.1                              |
| Middle                                                                                                       | 1                                | 33.3  | 24.7  | 33      | 24.8  | 23.7  | 2    | 50.0  | 20.3  | 200     | 69.2  | 18.7  | 22.0                              |
| Upper                                                                                                        | 1                                | 33.3  | 52.1  | 50      | 37.6  | 58.7  | 1    | 25.0  | 45.8  | 44      | 15.2  | 55.7  | 40.0                              |
| Unknown                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.7   | 0.0                               |
| Total                                                                                                        | 3                                | 100.0 | 100.0 | 133     | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 289     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 1                                | 7.1   | 9.2   | 100     | 9.3   | 4.9   | 2    | 18.2  | 15.7  | 159     | 13.4  | 8.9   | 19.8                              |
| Moderate                                                                                                     | 5                                | 35.7  | 17.2  | 379     | 35.3  | 12.1  | 1    | 9.1   | 23.8  | 45      | 3.8   | 18.9  | 18.1                              |
| Middle                                                                                                       | 4                                | 28.6  | 22.6  | 284     | 26.4  | 19.7  | 4    | 36.4  | 22.0  | 450     | 37.9  | 21.8  | 22.0                              |
| Upper                                                                                                        | 3                                | 21.4  | 38.6  | 194     | 18.1  | 51.1  | 3    | 27.3  | 26.6  | 486     | 41.0  | 38.9  | 40.0                              |
| Unknown                                                                                                      | 1                                | 7.1   | 12.5  | 117     | 10.9  | 12.2  | 1    | 9.1   | 11.9  | 46      | 3.9   | 11.5  | 0.0                               |
| Total                                                                                                        | 14                               | 100.0 | 100.0 | 1,074   | 100.0 | 100.0 | 11   | 100.0 | 100.0 | 1,186   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D139B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Midland MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|--------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 6.5   | 0       | 0.0   | 2.6   | 19.8                              |
| Moderate                                                                                                     | 2                                | 40.0  | 0.0   | 150     | 39.1  | 0.0   | 0    | 0.0   | 13.0  | 0       | 0.0   | 9.8   | 18.1                              |
| Middle                                                                                                       | 2                                | 40.0  | 26.7  | 184     | 47.9  | 35.3  | 1    | 50.0  | 28.3  | 100     | 29.2  | 21.3  | 22.0                              |
| Upper                                                                                                        | 1                                | 20.0  | 73.3  | 50      | 13.0  | 64.7  | 1    | 50.0  | 52.2  | 242     | 70.8  | 66.3  | 40.0                              |
| Unknown                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                               |
| Total                                                                                                        | 5                                | 100.0 | 100.0 | 384     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 342     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 24.0  | 0       | 0.0   | 13.0  | 0    | 0.0   | 8.6   | 0       | 0.0   | 5.5   | 19.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 24.0  | 0       | 0.0   | 20.9  | 0    | 0.0   | 27.2  | 0       | 0.0   | 22.5  | 18.1                              |
| Middle                                                                                                       | 0                                | 0.0   | 16.0  | 0       | 0.0   | 17.3  | 0    | 0.0   | 30.9  | 0       | 0.0   | 27.0  | 22.0                              |
| Upper                                                                                                        | 0                                | 0.0   | 36.0  | 0       | 0.0   | 48.8  | 0    | 0.0   | 30.9  | 0       | 0.0   | 42.3  | 40.0                              |
| Unknown                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 2.5   | 0       | 0.0   | 2.7   | 0.0                               |
| Total                                                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.8                              |
| Moderate                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.1                              |
| Middle                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 22.0                              |
| Upper                                                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.0                              |
| Unknown                                                                                                      | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D140A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Midland MSA |                          |       |       |         |       |       |                                   |
|-----------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                     | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 0                        | 0.0   | 16.9  | 0       | 0.0   | 9.3   | 20.1                              |
| Moderate                                                                                            | 0                        | 0.0   | 24.0  | 0       | 0.0   | 18.3  | 17.7                              |
| Middle                                                                                              | 0                        | 0.0   | 23.6  | 0       | 0.0   | 24.0  | 20.7                              |
| Upper                                                                                               | 2                        | 100.0 | 27.4  | 251     | 100.0 | 41.3  | 41.5                              |
| Unknown                                                                                             | 0                        | 0.0   | 8.1   | 0       | 0.0   | 7.1   | 0.0                               |
| Total                                                                                               | 2                        | 100.0 | 100.0 | 251     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                     |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 1                        | 100.0 | 6.4   | 100     | 100.0 | 3.0   | 20.1                              |
| Moderate                                                                                            | 0                        | 0.0   | 16.6  | 0       | 0.0   | 11.4  | 17.7                              |
| Middle                                                                                              | 0                        | 0.0   | 21.3  | 0       | 0.0   | 18.2  | 20.7                              |
| Upper                                                                                               | 0                        | 0.0   | 41.0  | 0       | 0.0   | 52.1  | 41.5                              |
| Unknown                                                                                             | 0                        | 0.0   | 14.7  | 0       | 0.0   | 15.2  | 0.0                               |
| Total                                                                                               | 1                        | 100.0 | 100.0 | 100     | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 0                        | 0.0   | 9.3   | 0       | 0.0   | 5.5   | 20.1                              |
| Moderate                                                                                            | 0                        | 0.0   | 15.1  | 0       | 0.0   | 7.6   | 17.7                              |
| Middle                                                                                              | 0                        | 0.0   | 24.4  | 0       | 0.0   | 18.4  | 20.7                              |
| Upper                                                                                               | 2                        | 66.7  | 50.0  | 260     | 72.2  | 68.1  | 41.5                              |
| Unknown                                                                                             | 1                        | 33.3  | 1.2   | 100     | 27.8  | 0.4   | 0.0                               |
| Total                                                                                               | 3                        | 100.0 | 100.0 | 360     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                                                 | 1                        | 14.3  | 10.7  | 100     | 13.0  | 5.7   | 20.1                              |
| Moderate                                                                                            | 0                        | 0.0   | 19.3  | 0       | 0.0   | 14.2  | 17.7                              |
| Middle                                                                                              | 1                        | 14.3  | 21.9  | 56      | 7.3   | 20.5  | 20.7                              |
| Upper                                                                                               | 4                        | 57.1  | 35.1  | 511     | 66.6  | 47.3  | 41.5                              |
| Unknown                                                                                             | 1                        | 14.3  | 13.1  | 100     | 13.0  | 12.4  | 0.0                               |
| Total                                                                                               | 7                        | 100.0 | 100.0 | 767     | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                      |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                           |                          |       |       |         |       |       |                                   |

Table D140B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Midland MSA                                        |                          |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                     | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                       |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 7.4   | 0       | 0.0   | 6.8   | 20.1                              |
| Moderate                                                            | 0                        | 0.0   | 14.8  | 0       | 0.0   | 20.4  | 17.7                              |
| Middle                                                              | 1                        | 100.0 | 7.4   | 56      | 100.0 | 4.2   | 20.7                              |
| Upper                                                               | 0                        | 0.0   | 63.0  | 0       | 0.0   | 66.1  | 41.5                              |
| Unknown                                                             | 0                        | 0.0   | 7.4   | 0       | 0.0   | 2.4   | 0.0                               |
| Total                                                               | 1                        | 100.0 | 100.0 | 56      | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                         |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 7.4   | 0       | 0.0   | 3.2   | 20.1                              |
| Moderate                                                            | 0                        | 0.0   | 18.5  | 0       | 0.0   | 10.6  | 17.7                              |
| Middle                                                              | 0                        | 0.0   | 29.6  | 0       | 0.0   | 23.4  | 20.7                              |
| Upper                                                               | 0                        | 0.0   | 40.7  | 0       | 0.0   | 59.4  | 41.5                              |
| Unknown                                                             | 0                        | 0.0   | 3.7   | 0       | 0.0   | 3.4   | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                              |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.1                              |
| Moderate                                                            | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.7                              |
| Middle                                                              | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.7                              |
| Upper                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 41.5                              |
| Unknown                                                             | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.      |                          |       |       |         |       |       |                                   |

Table D141

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Midland MSA                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 7                                | 36.8  | 57.1  | 949     | 37.6  | 45.1  | 7    | 58.3  | 57.1  | 491     | 23.7  | 37.2  | 90.6                     |
| Over \$1 Million                                                                   | 7                                | 36.8  |       | 1,434   | 56.8  |       | 4    | 33.3  |       | 1,080   | 52.1  |       | 8.3                      |
| Revenue Unknown                                                                    | 5                                | 26.3  |       | 143     | 5.7   |       | 1    | 8.3   |       | 500     | 24.1  |       | 1.1                      |
| Total                                                                              | 19                               | 100.0 |       | 2,526   | 100.0 |       | 12   | 100.0 |       | 2,071   | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 14                               | 73.7  | 88.7  | 569     | 22.5  | 32.5  | 8    | 66.7  | 92.9  | 484     | 23.4  | 36.5  |                          |
| \$100,001 - \$250,000                                                              | 2                                | 10.5  | 6.7   | 307     | 12.2  | 21.0  | 2    | 16.7  | 3.7   | 337     | 16.3  | 17.6  |                          |
| \$250,001 - \$1 Million                                                            | 3                                | 15.8  | 4.7   | 1,650   | 65.3  | 46.4  | 2    | 16.7  | 3.4   | 1,250   | 60.4  | 45.9  |                          |
| Total                                                                              | 19                               | 100.0 | 100.0 | 2,526   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 2,071   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 4                                | 57.1  |       | 142     | 15.0  |       | 6    | 85.7  |       | 344     | 70.1  |       |                          |
| \$100,001 - \$250,000                                                              | 2                                | 28.6  |       | 307     | 32.3  |       | 1    | 14.3  |       | 147     | 29.9  |       |                          |
| \$250,001 - \$1 Million                                                            | 1                                | 14.3  | 500   | 52.7    | 0     | 0.0   | 0    | 0.0   |       |         |       |       |                          |
| Total                                                                              | 7                                | 100.0 | 949   | 100.0   | 7     | 100.0 | 491  | 100.0 |       |         |       |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D142

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Midland MSA                                              |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 14                       | 50.0  | 38.0  | 905     | 31.2  | 28.2  | 90.8                     |
| Over \$1 Million                                                          | 10                       | 35.7  |       | 1,883   | 64.9  |       | 8.0                      |
| Revenue Unknown                                                           | 4                        | 14.3  |       | 112     | 3.9   |       | 1.3                      |
| Total                                                                     | 28                       | 100.0 |       | 2,900   | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 23                       | 82.1  | 82.5  | 1,015   | 35.0  | 27.8  |                          |
| \$100,001 - \$250,000                                                     | 1                        | 3.6   | 10.4  | 147     | 5.1   | 23.2  |                          |
| \$250,001 - \$1 Million                                                   | 4                        | 14.3  | 7.1   | 1,738   | 59.9  | 49.0  |                          |
| Total                                                                     | 28                       | 100.0 | 100.0 | 2,900   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 12                       | 85.7  |       | 456     | 50.4  |       |                          |
| \$100,001 - \$250,000                                                     | 1                        | 7.1   |       | 147     | 16.2  |       |                          |
| \$250,001 - \$1 Million                                                   | 1                        | 7.1   |       | 302     | 33.4  |       |                          |
| Total                                                                     | 14                       | 100.0 |       | 905     | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table D143

| 2022 Combined Demographics<br>Assessment Area: Muskegon MSA                                                                                                                               |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 5                         | 10.9                  | 3,618                              | 8.2          | 1,197                                              | 33.1         | 9,041                     | 20.4         |
| Moderate                                                                                                                                                                                  | 8                         | 17.4                  | 5,626                              | 12.7         | 1,117                                              | 19.9         | 8,299                     | 18.7         |
| Middle                                                                                                                                                                                    | 21                        | 45.7                  | 22,575                             | 50.9         | 1,827                                              | 8.1          | 9,396                     | 21.2         |
| Upper                                                                                                                                                                                     | 11                        | 23.9                  | 12,571                             | 28.3         | 429                                                | 3.4          | 17,654                    | 39.8         |
| Unknown                                                                                                                                                                                   | 1                         | 2.2                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>46</b>                 | <b>100.0</b>          | <b>44,390</b>                      | <b>100.0</b> | <b>4,570</b>                                       | <b>10.3</b>  | <b>44,390</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 8,134                     | 2,962                 | 5.9                                | 36.4         | 3,639                                              | 44.7         | 1,533                     | 18.8         |
| Moderate                                                                                                                                                                                  | 9,909                     | 5,299                 | 10.5                               | 53.5         | 3,388                                              | 34.2         | 1,222                     | 12.3         |
| Middle                                                                                                                                                                                    | 37,465                    | 26,613                | 52.8                               | 71.0         | 7,319                                              | 19.5         | 3,533                     | 9.4          |
| Upper                                                                                                                                                                                     | 18,827                    | 15,488                | 30.8                               | 82.3         | 1,356                                              | 7.2          | 1,983                     | 10.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>74,335</b>             | <b>50,362</b>         | <b>100.0</b>                       | <b>67.8</b>  | <b>15,702</b>                                      | <b>21.1</b>  | <b>8,271</b>              | <b>11.1</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 732                       | 12.2                  | 650                                | 12.1         | 77                                                 | 14.0         | 5                         | 9.8          |
| Moderate                                                                                                                                                                                  | 1,031                     | 17.2                  | 832                                | 15.4         | 194                                                | 35.3         | 5                         | 9.8          |
| Middle                                                                                                                                                                                    | 2,671                     | 44.6                  | 2,448                              | 45.4         | 192                                                | 34.9         | 31                        | 60.8         |
| Upper                                                                                                                                                                                     | 1,559                     | 26.0                  | 1,462                              | 27.1         | 87                                                 | 15.8         | 10                        | 19.6         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>5,993</b>              | <b>100.0</b>          | <b>5,392</b>                       | <b>100.0</b> | <b>550</b>                                         | <b>100.0</b> | <b>51</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | <b>90.0</b>  |                                                    | <b>9.2</b>   |                           | <b>0.9</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 5                         | 3.9                   | 5                                  | 4.1          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 99                        | 76.7                  | 95                                 | 77.2         | 4                                                  | 66.7         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 25                        | 19.4                  | 23                                 | 18.7         | 2                                                  | 33.3         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>129</b>                | <b>100.0</b>          | <b>123</b>                         | <b>100.0</b> | <b>6</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | <b>95.3</b>  |                                                    | <b>4.7</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D144

| 2021 Combined Demographics<br>Assessment Area: Muskegon MSA                                                                                                                               |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 5                         | 11.6                  | 3,329                              | 7.6          | 1,611                                              | 48.4         | 9,463                     | 21.7         |
| Moderate                                                                                                                                                                                  | 11                        | 25.6                  | 9,228                              | 21.1         | 2,102                                              | 22.8         | 7,404                     | 17.0         |
| Middle                                                                                                                                                                                    | 14                        | 32.6                  | 17,533                             | 40.1         | 1,992                                              | 11.4         | 9,013                     | 20.6         |
| Upper                                                                                                                                                                                     | 12                        | 27.9                  | 13,586                             | 31.1         | 630                                                | 4.6          | 17,796                    | 40.7         |
| Unknown                                                                                                                                                                                   | 1                         | 2.3                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>43</b>                 | <b>100.0</b>          | <b>43,676</b>                      | <b>100.0</b> | <b>6,335</b>                                       | <b>14.5</b>  | <b>43,676</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 6,912                     | 2,421                 | 5.0                                | 35.0         | 3,048                                              | 44.1         | 1,443                     | 20.9         |
| Moderate                                                                                                                                                                                  | 17,758                    | 9,070                 | 18.8                               | 51.1         | 6,583                                              | 37.1         | 2,105                     | 11.9         |
| Middle                                                                                                                                                                                    | 26,965                    | 20,263                | 41.9                               | 75.1         | 3,873                                              | 14.4         | 2,829                     | 10.5         |
| Upper                                                                                                                                                                                     | 21,719                    | 16,567                | 34.3                               | 76.3         | 2,665                                              | 12.3         | 2,487                     | 11.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>73,354</b>             | <b>48,321</b>         | <b>100.0</b>                       | <b>65.9</b>  | <b>16,169</b>                                      | <b>22.0</b>  | <b>8,864</b>              | <b>12.1</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 527                       | 8.8                   | 446                                | 8.3          | 81                                                 | 14.6         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 1,346                     | 22.5                  | 1,157                              | 21.5         | 181                                                | 32.6         | 8                         | 18.6         |
| Middle                                                                                                                                                                                    | 2,026                     | 33.9                  | 1,883                              | 35.0         | 124                                                | 22.3         | 19                        | 44.2         |
| Upper                                                                                                                                                                                     | 2,086                     | 34.9                  | 1,900                              | 35.3         | 170                                                | 30.6         | 16                        | 37.2         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>5,985</b>              | <b>100.0</b>          | <b>5,386</b>                       | <b>100.0</b> | <b>556</b>                                         | <b>100.0</b> | <b>43</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | <b>90.0</b>  |                                                    | <b>9.3</b>   |                           | <b>0.7</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 83                        | 66.4                  | 82                                 | 69.5         | 1                                                  | 14.3         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 42                        | 33.6                  | 36                                 | 30.5         | 6                                                  | 85.7         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>125</b>                | <b>100.0</b>          | <b>118</b>                         | <b>100.0</b> | <b>7</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | <b>94.4</b>  |                                                    | <b>5.6</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D145

| 2020 Combined Demographics<br>Assessment Area: Muskegon MSA                                                             |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 5                         | 11.6                  | 3,329                              | 7.6          | 1,611                                              | 48.4         | 9,463                     | 21.7         |
| Moderate                                                                                                                | 11                        | 25.6                  | 9,228                              | 21.1         | 2,102                                              | 22.8         | 7,404                     | 17.0         |
| Middle                                                                                                                  | 14                        | 32.6                  | 17,533                             | 40.1         | 1,992                                              | 11.4         | 9,013                     | 20.6         |
| Upper                                                                                                                   | 12                        | 27.9                  | 13,586                             | 31.1         | 630                                                | 4.6          | 17,796                    | 40.7         |
| Unknown                                                                                                                 | 1                         | 2.3                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>43</b>                 | <b>100.0</b>          | <b>43,676</b>                      | <b>100.0</b> | <b>6,335</b>                                       | <b>14.5</b>  | <b>43,676</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 6,912                     | 2,421                 | 5.0                                | 35.0         | 3,048                                              | 44.1         | 1,443                     | 20.9         |
| Moderate                                                                                                                | 17,758                    | 9,070                 | 18.8                               | 51.1         | 6,583                                              | 37.1         | 2,105                     | 11.9         |
| Middle                                                                                                                  | 26,965                    | 20,263                | 41.9                               | 75.1         | 3,873                                              | 14.4         | 2,829                     | 10.5         |
| Upper                                                                                                                   | 21,719                    | 16,567                | 34.3                               | 76.3         | 2,665                                              | 12.3         | 2,487                     | 11.5         |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>73,354</b>             | <b>48,321</b>         | <b>100.0</b>                       | <b>65.9</b>  | <b>16,169</b>                                      | <b>22.0</b>  | <b>8,864</b>              | <b>12.1</b>  |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 509                       | 8.4                   | 426                                | 7.9          | 83                                                 | 14.4         | 0                         | 0.0          |
| Moderate                                                                                                                | 1,317                     | 21.8                  | 1,124                              | 20.8         | 186                                                | 32.2         | 7                         | 16.3         |
| Middle                                                                                                                  | 2,094                     | 34.7                  | 1,947                              | 36.0         | 128                                                | 22.2         | 19                        | 44.2         |
| Upper                                                                                                                   | 2,114                     | 35.0                  | 1,917                              | 35.4         | 180                                                | 31.2         | 17                        | 39.5         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>6,034</b>              | <b>100.0</b>          | <b>5,414</b>                       | <b>100.0</b> | <b>577</b>                                         | <b>100.0</b> | <b>43</b>                 | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 89.7         |                                                    | 9.6          |                           | 0.7          |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                  | 84                        | 66.7                  | 83                                 | 69.7         | 1                                                  | 14.3         | 0                         | 0.0          |
| Upper                                                                                                                   | 42                        | 33.3                  | 36                                 | 30.3         | 6                                                  | 85.7         | 0                         | 0.0          |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>126</b>                | <b>100.0</b>          | <b>119</b>                         | <b>100.0</b> | <b>7</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 94.4         |                                                    | 5.6          |                           | 0.0          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |



Table D146A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Muskegon MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                   | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                               | 0                                | 0.0   | 5.0   | 0       | 0.0   | 2.3   | 2    | 22.2  | 7.6   | 377     | 23.3  | 4.4   | 5.9                          |
| Moderate                                                                                                          | 3                                | 42.9  | 23.6  | 290     | 27.7  | 16.5  | 1    | 11.1  | 15.1  | 30      | 1.9   | 9.6   | 10.5                         |
| Middle                                                                                                            | 1                                | 14.3  | 40.3  | 92      | 8.8   | 42.5  | 5    | 55.6  | 50.7  | 773     | 47.9  | 52.4  | 52.8                         |
| Upper                                                                                                             | 3                                | 42.9  | 31.0  | 666     | 63.5  | 38.7  | 1    | 11.1  | 26.6  | 435     | 26.9  | 33.6  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                             | 7                                | 100.0 | 100.0 | 1,048   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 1,615   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                               | 0                                | 0.0   | 1.2   | 0       | 0.0   | 0.5   | 1    | 4.0   | 3.2   | 70      | 2.5   | 2.5   | 5.9                          |
| Moderate                                                                                                          | 3                                | 12.5  | 13.0  | 338     | 9.8   | 9.3   | 2    | 8.0   | 9.9   | 138     | 4.9   | 7.4   | 10.5                         |
| Middle                                                                                                            | 11                               | 45.8  | 44.8  | 1,581   | 46.0  | 43.0  | 12   | 48.0  | 53.6  | 1,100   | 39.5  | 51.0  | 52.8                         |
| Upper                                                                                                             | 10                               | 41.7  | 41.0  | 1,517   | 44.2  | 47.1  | 10   | 40.0  | 33.3  | 1,480   | 53.1  | 39.1  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                             | 24                               | 100.0 | 100.0 | 3,436   | 100.0 | 100.0 | 25   | 100.0 | 100.0 | 2,788   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                               | 0                                | 0.0   | 2.9   | 0       | 0.0   | 1.8   | 0    | 0.0   | 3.5   | 0       | 0.0   | 2.9   | 5.9                          |
| Moderate                                                                                                          | 2                                | 15.4  | 13.6  | 99      | 8.8   | 10.5  | 2    | 14.3  | 8.0   | 79      | 7.5   | 5.9   | 10.5                         |
| Middle                                                                                                            | 8                                | 61.5  | 42.5  | 732     | 65.1  | 43.5  | 7    | 50.0  | 48.5  | 393     | 37.5  | 45.2  | 52.8                         |
| Upper                                                                                                             | 3                                | 23.1  | 41.0  | 294     | 26.1  | 44.2  | 5    | 35.7  | 39.9  | 577     | 55.0  | 46.0  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                             | 13                               | 100.0 | 100.0 | 1,125   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,049   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                               | 0                                | 0.0   | 11.8  | 0       | 0.0   | 0.6   | 0    | 0.0   | 26.3  | 0       | 0.0   | 20.1  | 20.0                         |
| Moderate                                                                                                          | 0                                | 0.0   | 41.2  | 0       | 0.0   | 15.5  | 0    | 0.0   | 21.1  | 0       | 0.0   | 45.5  | 21.8                         |
| Middle                                                                                                            | 0                                | 0.0   | 17.6  | 0       | 0.0   | 20.8  | 0    | 0.0   | 42.1  | 0       | 0.0   | 28.8  | 52.0                         |
| Upper                                                                                                             | 0                                | 0.0   | 29.4  | 0       | 0.0   | 63.0  | 1    | 100.0 | 10.5  | 7,311   | 100.0 | 5.6   | 6.3                          |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                             | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 7,311   | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                               | 2                                | 3.5   | 2.8   | 38      | 0.6   | 1.3   | 3    | 4.9   | 5.6   | 447     | 3.2   | 4.2   | 5.9                          |
| Moderate                                                                                                          | 11                               | 19.3  | 17.1  | 1,011   | 14.9  | 12.6  | 6    | 9.8   | 12.9  | 286     | 2.1   | 9.8   | 10.5                         |
| Middle                                                                                                            | 26                               | 45.6  | 42.9  | 3,047   | 44.9  | 41.7  | 28   | 45.9  | 51.3  | 2,626   | 18.9  | 50.8  | 52.8                         |
| Upper                                                                                                             | 18                               | 31.6  | 37.3  | 2,695   | 39.7  | 44.3  | 24   | 39.3  | 30.2  | 10,567  | 75.9  | 35.1  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                             | 57                               | 100.0 | 100.0 | 6,791   | 100.0 | 100.0 | 61   | 100.0 | 100.0 | 13,926  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D146B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Muskegon MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                   | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                               | 1                                | 9.1   | 0.8   | 10      | 0.9   | 0.2   | 0    | 0.0   | 2.5   | 0       | 0.0   | 2.1   | 5.9                          |
| Moderate                                                                                                          | 2                                | 18.2  | 14.0  | 224     | 20.5  | 13.6  | 1    | 8.3   | 3.0   | 39      | 3.4   | 0.9   | 10.5                         |
| Middle                                                                                                            | 6                                | 54.5  | 36.4  | 642     | 58.7  | 24.3  | 4    | 33.3  | 54.5  | 360     | 31.0  | 52.8  | 52.8                         |
| Upper                                                                                                             | 2                                | 18.2  | 48.8  | 218     | 19.9  | 62.0  | 7    | 58.3  | 39.9  | 764     | 65.7  | 44.1  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                             | 11                               | 100.0 | 100.0 | 1,094   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 1,163   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                               | 1                                | 50.0  | 4.2   | 28      | 31.8  | 3.0   | 0    | 0.0   | 4.2   | 0       | 0.0   | 2.6   | 5.9                          |
| Moderate                                                                                                          | 1                                | 50.0  | 10.4  | 60      | 68.2  | 7.2   | 0    | 0.0   | 10.9  | 0       | 0.0   | 6.1   | 10.5                         |
| Middle                                                                                                            | 0                                | 0.0   | 43.8  | 0       | 0.0   | 34.7  | 0    | 0.0   | 58.2  | 0       | 0.0   | 44.4  | 52.8                         |
| Upper                                                                                                             | 0                                | 0.0   | 41.7  | 0       | 0.0   | 55.1  | 0    | 0.0   | 26.7  | 0       | 0.0   | 47.0  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                             | 2                                | 100.0 | 100.0 | 88      | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                               | 0                                | 0.0   | 1.4   | 0       | 0.0   | 0.9   | 0    | 0.0   | 6.3   | 0       | 0.0   | 4.0   | 5.9                          |
| Moderate                                                                                                          | 0                                | 0.0   | 21.9  | 0       | 0.0   | 14.7  | 0    | 0.0   | 45.0  | 0       | 0.0   | 21.9  | 10.5                         |
| Middle                                                                                                            | 0                                | 0.0   | 43.8  | 0       | 0.0   | 48.2  | 0    | 0.0   | 28.8  | 0       | 0.0   | 44.6  | 52.8                         |
| Upper                                                                                                             | 0                                | 0.0   | 32.9  | 0       | 0.0   | 36.2  | 0    | 0.0   | 19.8  | 0       | 0.0   | 29.6  | 30.8                         |
| Unknown                                                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                             | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D147A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Muskegon MSA                                           |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | %     | %     | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.3   | 0       | 0.0   | 1.4   | 5.0                          |
| Moderate                                                                | 1                        | 20.0  | 20.3  | 54      | 7.2   | 13.7  | 18.8                         |
| Middle                                                                  | 2                        | 40.0  | 41.9  | 206     | 27.6  | 41.6  | 41.9                         |
| Upper                                                                   | 2                        | 40.0  | 34.5  | 486     | 65.1  | 43.3  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 5                        | 100.0 | 100.0 | 746     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.3   | 5.0                          |
| Moderate                                                                | 1                        | 4.2   | 9.7   | 31      | 0.9   | 6.7   | 18.8                         |
| Middle                                                                  | 12                       | 50.0  | 45.2  | 1,942   | 56.1  | 43.7  | 41.9                         |
| Upper                                                                   | 11                       | 45.8  | 44.4  | 1,486   | 43.0  | 49.3  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 24                       | 100.0 | 100.0 | 3,459   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.6   | 0       | 0.0   | 1.3   | 5.0                          |
| Moderate                                                                | 1                        | 11.1  | 13.8  | 50      | 5.9   | 10.3  | 18.8                         |
| Middle                                                                  | 2                        | 22.2  | 36.2  | 260     | 30.6  | 32.4  | 41.9                         |
| Upper                                                                   | 6                        | 66.7  | 47.4  | 541     | 63.6  | 56.0  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 9                        | 100.0 | 100.0 | 851     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 14.4                         |
| Moderate                                                                | 0                        | 0.0   | 28.6  | 0       | 0.0   | 11.0  | 44.0                         |
| Middle                                                                  | 0                        | 0.0   | 50.0  | 0       | 0.0   | 40.5  | 16.2                         |
| Upper                                                                   | 0                        | 0.0   | 21.4  | 0       | 0.0   | 48.5  | 25.5                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 1.9   | 0       | 0.0   | 0.8   | 5.0                          |
| Moderate                                                                | 5                        | 10.6  | 14.3  | 276     | 4.7   | 9.8   | 18.8                         |
| Middle                                                                  | 19                       | 40.4  | 43.4  | 2,553   | 43.9  | 42.3  | 41.9                         |
| Upper                                                                   | 23                       | 48.9  | 40.5  | 2,993   | 51.4  | 47.1  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 47                       | 100.0 | 100.0 | 5,822   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D147B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Muskegon MSA                                           |                          |       |       |         |       |       |                              |
| Geographic<br>Income Level                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.2   | 5.0                          |
| Moderate                                                                | 2                        | 22.2  | 11.5  | 141     | 18.4  | 3.4   | 18.8                         |
| Middle                                                                  | 3                        | 33.3  | 29.5  | 145     | 18.9  | 16.3  | 41.9                         |
| Upper                                                                   | 4                        | 44.4  | 58.3  | 480     | 62.7  | 80.0  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 9                        | 100.0 | 100.0 | 766     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 1.9   | 0       | 0.0   | 0.9   | 5.0                          |
| Moderate                                                                | 0                        | 0.0   | 13.1  | 0       | 0.0   | 9.6   | 18.8                         |
| Middle                                                                  | 0                        | 0.0   | 44.9  | 0       | 0.0   | 42.2  | 41.9                         |
| Upper                                                                   | 0                        | 0.0   | 40.2  | 0       | 0.0   | 47.2  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.4   | 0       | 0.0   | 1.1   | 5.0                          |
| Moderate                                                                | 0                        | 0.0   | 18.4  | 0       | 0.0   | 13.8  | 18.8                         |
| Middle                                                                  | 0                        | 0.0   | 48.5  | 0       | 0.0   | 50.8  | 41.9                         |
| Upper                                                                   | 0                        | 0.0   | 30.6  | 0       | 0.0   | 34.3  | 34.3                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D148

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography<br>Assessment Area: Muskegon MSA                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                                                                                           | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                                                                                       | 6                                | 8.1   | 9.0   | 1,333   | 7.5   | 14.6  | 3    | 5.7   | 9.8   | 661     | 6.9   | 8.6   | 12.2                     |
| Moderate                                                                                                                                                                                  | 30                               | 40.5  | 23.2  | 7,569   | 42.8  | 27.2  | 26   | 49.1  | 19.4  | 5,032   | 52.6  | 31.1  | 17.2                     |
| Middle                                                                                                                                                                                    | 7                                | 9.5   | 34.4  | 1,012   | 5.7   | 26.1  | 16   | 30.2  | 45.1  | 2,281   | 23.8  | 37.5  | 44.6                     |
| Upper                                                                                                                                                                                     | 31                               | 41.9  | 33.3  | 7,755   | 43.9  | 32.1  | 8    | 15.1  | 25.3  | 1,590   | 16.6  | 22.7  | 26.0                     |
| Unknown                                                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 74                               | 100.0 | 100.0 | 17,669  | 100.0 | 100.0 | 53   | 100.0 | 100.0 | 9,564   | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D149

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Muskegon MSA                                                                                 |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                                                                                                                                       | 20                       | 17.2  | 9.0   | 6,070   | 26.6  | 14.8  | 8.4                      |
| Moderate                                                                                                                                                                                  | 43                       | 37.1  | 23.5  | 6,615   | 29.0  | 25.1  | 21.8                     |
| Middle                                                                                                                                                                                    | 12                       | 10.3  | 32.6  | 1,159   | 5.1   | 27.9  | 34.7                     |
| Upper                                                                                                                                                                                     | 41                       | 35.3  | 34.8  | 8,977   | 39.3  | 32.1  | 35.0                     |
| Unknown                                                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 116                      | 100.0 | 100.0 | 22,821  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D150A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Muskegon MSA |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                   | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                               | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                               | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                               | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                           | 2                                | 28.6  | 9.1   | 167     | 15.9  | 5.2   | 1    | 11.1  | 9.5   | 90      | 5.6   | 5.4   | 20.4                              |
| Moderate                                                                                                      | 4                                | 57.1  | 28.0  | 545     | 52.0  | 21.8  | 2    | 22.2  | 24.2  | 228     | 14.1  | 18.9  | 18.7                              |
| Middle                                                                                                        | 0                                | 0.0   | 22.6  | 0       | 0.0   | 21.7  | 4    | 44.4  | 21.8  | 613     | 38.0  | 21.6  | 21.2                              |
| Upper                                                                                                         | 1                                | 14.3  | 27.5  | 336     | 32.1  | 38.7  | 2    | 22.2  | 26.4  | 684     | 42.4  | 37.8  | 39.8                              |
| Unknown                                                                                                       | 0                                | 0.0   | 12.8  | 0       | 0.0   | 12.6  | 0    | 0.0   | 18.1  | 0       | 0.0   | 16.3  | 0.0                               |
| Total                                                                                                         | 7                                | 100.0 | 100.0 | 1,048   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 1,615   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                           | 2                                | 8.3   | 7.2   | 107     | 3.1   | 4.0   | 7    | 28.0  | 13.2  | 371     | 13.3  | 7.8   | 20.4                              |
| Moderate                                                                                                      | 8                                | 33.3  | 22.1  | 856     | 24.9  | 16.2  | 6    | 24.0  | 26.9  | 589     | 21.1  | 22.0  | 18.7                              |
| Middle                                                                                                        | 3                                | 12.5  | 24.5  | 369     | 10.7  | 22.1  | 5    | 20.0  | 25.7  | 557     | 20.0  | 25.4  | 21.2                              |
| Upper                                                                                                         | 9                                | 37.5  | 32.8  | 1,884   | 54.8  | 43.4  | 6    | 24.0  | 24.8  | 1,199   | 43.0  | 34.6  | 39.8                              |
| Unknown                                                                                                       | 2                                | 8.3   | 13.4  | 220     | 6.4   | 14.3  | 1    | 4.0   | 9.4   | 72      | 2.6   | 10.3  | 0.0                               |
| Total                                                                                                         | 24                               | 100.0 | 100.0 | 3,436   | 100.0 | 100.0 | 25   | 100.0 | 100.0 | 2,788   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                           | 2                                | 15.4  | 4.4   | 108     | 9.6   | 3.0   | 2    | 14.3  | 7.4   | 135     | 12.9  | 4.1   | 20.4                              |
| Moderate                                                                                                      | 1                                | 7.7   | 19.8  | 22      | 2.0   | 15.5  | 4    | 28.6  | 18.6  | 199     | 19.0  | 13.2  | 18.7                              |
| Middle                                                                                                        | 4                                | 30.8  | 26.5  | 245     | 21.8  | 22.6  | 3    | 21.4  | 25.4  | 136     | 13.0  | 21.7  | 21.2                              |
| Upper                                                                                                         | 5                                | 38.5  | 46.6  | 600     | 53.3  | 56.0  | 4    | 28.6  | 46.2  | 519     | 49.5  | 58.2  | 39.8                              |
| Unknown                                                                                                       | 1                                | 7.7   | 2.7   | 150     | 13.3  | 2.9   | 1    | 7.1   | 2.3   | 60      | 5.7   | 2.7   | 0.0                               |
| Total                                                                                                         | 13                               | 100.0 | 100.0 | 1,125   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,049   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                           | 7                                | 12.3  | 7.8   | 410     | 6.0   | 4.5   | 11   | 18.3  | 10.3  | 658     | 9.9   | 6.0   | 20.4                              |
| Moderate                                                                                                      | 15                               | 26.3  | 24.0  | 1,503   | 22.1  | 18.6  | 13   | 21.7  | 24.0  | 1,107   | 16.7  | 19.4  | 18.7                              |
| Middle                                                                                                        | 9                                | 15.8  | 23.7  | 824     | 12.1  | 21.8  | 12   | 20.0  | 23.1  | 1,306   | 19.7  | 22.5  | 21.2                              |
| Upper                                                                                                         | 21                               | 36.8  | 31.4  | 3,565   | 52.5  | 41.6  | 21   | 35.0  | 28.0  | 3,344   | 50.6  | 38.0  | 39.8                              |
| Unknown                                                                                                       | 5                                | 8.8   | 13.2  | 489     | 7.2   | 13.6  | 3    | 5.0   | 14.7  | 200     | 3.0   | 14.2  | 0.0                               |
| Total                                                                                                         | 57                               | 100.0 | 100.0 | 6,791   | 100.0 | 100.0 | 60   | 100.0 | 100.0 | 6,615   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D150B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Muskegon MSA                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 9.1   | 0       | 0.0   | 4.7   | 1    | 8.3   | 8.6   | 62      | 5.3   | 4.9   | 20.4                              |
| Moderate                                                                                                                                                    | 1                                | 9.1   | 18.2  | 20      | 1.8   | 13.4  | 1    | 8.3   | 21.2  | 91      | 7.8   | 13.4  | 18.7                              |
| Middle                                                                                                                                                      | 2                                | 18.2  | 21.5  | 210     | 19.2  | 21.7  | 0    | 0.0   | 19.7  | 0       | 0.0   | 15.6  | 21.2                              |
| Upper                                                                                                                                                       | 6                                | 54.5  | 48.8  | 745     | 68.1  | 58.8  | 9    | 75.0  | 45.5  | 942     | 81.0  | 62.9  | 39.8                              |
| Unknown                                                                                                                                                     | 2                                | 18.2  | 2.5   | 119     | 10.9  | 1.4   | 1    | 8.3   | 5.1   | 68      | 5.8   | 3.2   | 0.0                               |
| Total                                                                                                                                                       | 11                               | 100.0 | 100.0 | 1,094   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 1,163   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 1                                | 50.0  | 5.2   | 28      | 31.8  | 2.3   | 0    | 0.0   | 11.5  | 0       | 0.0   | 6.2   | 20.4                              |
| Moderate                                                                                                                                                    | 1                                | 50.0  | 24.0  | 60      | 68.2  | 16.6  | 0    | 0.0   | 24.8  | 0       | 0.0   | 20.6  | 18.7                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 28.1  | 0       | 0.0   | 18.9  | 0    | 0.0   | 29.1  | 0       | 0.0   | 22.4  | 21.2                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 40.6  | 0       | 0.0   | 61.7  | 0    | 0.0   | 31.5  | 0       | 0.0   | 48.7  | 39.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 2.1   | 0       | 0.0   | 0.6   | 0    | 0.0   | 3.0   | 0       | 0.0   | 2.1   | 0.0                               |
| Total                                                                                                                                                       | 2                                | 100.0 | 100.0 | 88      | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 1.4   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.4                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 1.4   | 0       | 0.0   | 1.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 18.7                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.2                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 39.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 97.3  | 0       | 0.0   | 98.2  | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D151A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level       |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Muskegon MSA                                             |                          |       |       |         |       |       |                                   |
| Borrower<br>Income Level                                                  | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                       | 0                        | 0.0   | 10.1  | 0       | 0.0   | 6.0   | 21.7                              |
| Moderate                                                                  | 2                        | 40.0  | 29.9  | 146     | 19.6  | 23.4  | 17.0                              |
| Middle                                                                    | 1                        | 20.0  | 25.2  | 114     | 15.3  | 24.6  | 20.6                              |
| Upper                                                                     | 2                        | 40.0  | 26.0  | 486     | 65.1  | 37.6  | 40.7                              |
| Unknown                                                                   | 0                        | 0.0   | 8.8   | 0       | 0.0   | 8.5   | 0.0                               |
| Total                                                                     | 5                        | 100.0 | 100.0 | 746     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                       | 3                        | 12.5  | 5.8   | 157     | 4.5   | 3.0   | 21.7                              |
| Moderate                                                                  | 7                        | 29.2  | 19.2  | 737     | 21.3  | 13.0  | 17.0                              |
| Middle                                                                    | 1                        | 4.2   | 23.4  | 114     | 3.3   | 20.3  | 20.6                              |
| Upper                                                                     | 11                       | 45.8  | 38.1  | 2,185   | 63.2  | 49.3  | 40.7                              |
| Unknown                                                                   | 2                        | 8.3   | 13.5  | 266     | 7.7   | 14.4  | 0.0                               |
| Total                                                                     | 24                       | 100.0 | 100.0 | 3,459   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                       | 3                        | 33.3  | 7.7   | 219     | 25.7  | 5.9   | 21.7                              |
| Moderate                                                                  | 1                        | 11.1  | 18.6  | 36      | 4.2   | 15.2  | 17.0                              |
| Middle                                                                    | 2                        | 22.2  | 24.4  | 220     | 25.9  | 20.6  | 20.6                              |
| Upper                                                                     | 3                        | 33.3  | 48.1  | 376     | 44.2  | 56.4  | 40.7                              |
| Unknown                                                                   | 0                        | 0.0   | 1.3   | 0       | 0.0   | 1.9   | 0.0                               |
| Total                                                                     | 9                        | 100.0 | 100.0 | 851     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                       | 8                        | 17.0  | 7.5   | 416     | 7.1   | 4.3   | 21.7                              |
| Moderate                                                                  | 12                       | 25.5  | 22.6  | 1,010   | 17.3  | 17.1  | 17.0                              |
| Middle                                                                    | 6                        | 12.8  | 23.5  | 676     | 11.6  | 21.7  | 20.6                              |
| Upper                                                                     | 18                       | 38.3  | 33.1  | 3,204   | 55.0  | 44.0  | 40.7                              |
| Unknown                                                                   | 3                        | 6.4   | 13.3  | 516     | 8.9   | 12.9  | 0.0                               |
| Total                                                                     | 47                       | 100.0 | 100.0 | 5,822   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |



Table D151B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Muskegon MSA                                       |                          |       |       |         |       |       |                                   |
| Borrower<br>Income Level                                            | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                     | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                       |                          |       |       |         |       |       |                                   |
| Low                                                                 | 2                        | 22.2  | 7.9   | 40      | 5.2   | 7.2   | 21.7                              |
| Moderate                                                            | 2                        | 22.2  | 12.9  | 91      | 11.9  | 5.1   | 17.0                              |
| Middle                                                              | 2                        | 22.2  | 23.7  | 228     | 29.8  | 15.2  | 20.6                              |
| Upper                                                               | 2                        | 22.2  | 52.5  | 157     | 20.5  | 70.9  | 40.7                              |
| Unknown                                                             | 1                        | 11.1  | 2.9   | 250     | 32.6  | 1.5   | 0.0                               |
| Total                                                               | 9                        | 100.0 | 100.0 | 766     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                         |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 12.1  | 0       | 0.0   | 8.6   | 21.7                              |
| Moderate                                                            | 0                        | 0.0   | 17.8  | 0       | 0.0   | 9.3   | 17.0                              |
| Middle                                                              | 0                        | 0.0   | 23.4  | 0       | 0.0   | 21.5  | 20.6                              |
| Upper                                                               | 0                        | 0.0   | 38.3  | 0       | 0.0   | 51.7  | 40.7                              |
| Unknown                                                             | 0                        | 0.0   | 8.4   | 0       | 0.0   | 8.9   | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                              |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.7                              |
| Moderate                                                            | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.0                              |
| Middle                                                              | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.6                              |
| Upper                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 40.7                              |
| Unknown                                                             | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.      |                          |       |       |         |       |       |                                   |

**Table D152**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Muskegon MSA                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 17                               | 23.0  | 48.4  | 1,363   | 7.7   | 28.4  | 15   | 28.3  | 51.0  | 1,373   | 14.4  | 28.9  | 90.0                     |
| Over \$1 Million                                                                                                        | 43                               | 58.1  |       | 14,989  | 84.8  |       | 36   | 67.9  |       | 8,037   | 84.0  |       | 9.2                      |
| Revenue Unknown                                                                                                         | 14                               | 18.9  |       | 1,317   | 7.5   |       | 2    | 3.8   |       | 154     | 1.6   |       | 0.9                      |
| Total                                                                                                                   | 74                               | 100.0 |       | 17,669  | 100.0 |       | 53   | 100.0 |       | 9,564   | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 35                               | 47.3  | 86.2  | 1,971   | 11.2  | 24.8  | 29   | 54.7  | 89.9  | 1,583   | 16.6  | 25.9  |                          |
| \$100,001 - \$250,000                                                                                                   | 14                               | 18.9  | 6.8   | 2,618   | 14.8  | 18.1  | 12   | 22.6  | 4.9   | 2,097   | 21.9  | 17.9  |                          |
| \$250,001 - \$1 Million                                                                                                 | 25                               | 33.8  | 7.0   | 13,080  | 74.0  | 57.1  | 12   | 22.6  | 5.1   | 5,884   | 61.5  | 56.2  |                          |
| Total                                                                                                                   | 74                               | 100.0 | 100.0 | 17,669  | 100.0 | 100.0 | 53   | 100.0 | 100.0 | 9,564   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 13                               | 76.5  |       | 724     | 53.1  |       | 12   | 80.0  |       | 645     | 47.0  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 4                                | 23.5  |       | 639     | 46.9  |       | 2    | 13.3  |       | 345     | 25.1  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 0                                | 0.0   |       | 0       | 0.0   |       | 1    | 6.7   |       | 383     | 27.9  |       |                          |
| Total                                                                                                                   | 17                               | 100.0 |       | 1,363   | 100.0 |       | 15   | 100.0 |       | 1,373   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D153**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses                                               |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Muskegon MSA                                                                                           |                          |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                                                              |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 52                       | 44.8  | 41.1  | 4,024   | 17.6  | 27.0  | 89.7                     |
| Over \$1 Million                                                                                                        | 57                       | 49.1  |       | 18,150  | 79.5  |       | 9.6                      |
| Revenue Unknown                                                                                                         | 7                        | 6.0   |       | 647     | 2.8   |       | 0.7                      |
| Total                                                                                                                   | 116                      | 100.0 |       | 22,821  | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 60                       | 51.7  | 82.0  | 2,722   | 11.9  | 26.0  |                          |
| \$100,001 - \$250,000                                                                                                   | 26                       | 22.4  | 10.3  | 4,561   | 20.0  | 23.9  |                          |
| \$250,001 - \$1 Million                                                                                                 | 30                       | 25.9  | 7.8   | 15,538  | 68.1  | 50.2  |                          |
| Total                                                                                                                   | 116                      | 100.0 | 100.0 | 22,821  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 40                       | 76.9  |       | 1,501   | 37.3  |       |                          |
| \$100,001 - \$250,000                                                                                                   | 11                       | 21.2  |       | 1,823   | 45.3  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 1                        | 1.9   |       | 700     | 17.4  |       |                          |
| Total                                                                                                                   | 52                       | 100.0 |       | 4,024   | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                          |       |       |         |       |       |                          |

Table D154

| 2022 Combined Demographics<br>Assessment Area: Austin Metropolitan                                                                                                                        |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 27                        | 6.4                   | 21,562                             | 5.2          | 5,043                                              | 23.4         | 84,820                    | 20.4         |
| Moderate                                                                                                                                                                                  | 100                       | 23.5                  | 88,697                             | 21.3         | 9,409                                              | 10.6         | 70,060                    | 16.8         |
| Middle                                                                                                                                                                                    | 142                       | 33.4                  | 148,541                            | 35.7         | 7,483                                              | 5.0          | 86,524                    | 20.8         |
| Upper                                                                                                                                                                                     | 140                       | 32.9                  | 154,103                            | 37.0         | 3,732                                              | 2.4          | 174,832                   | 42.0         |
| Unknown                                                                                                                                                                                   | 16                        | 3.8                   | 3,333                              | 0.8          | 868                                                | 26.0         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>425</b>                | <b>100.0</b>          | <b>416,236</b>                     | <b>100.0</b> | <b>26,535</b>                                      | <b>6.4</b>   | <b>416,236</b>            | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 46,024                    | 9,969                 | 2.6                                | 21.7         | 31,665                                             | 68.8         | 4,390                     | 9.5          |
| Moderate                                                                                                                                                                                  | 168,410                   | 68,287                | 17.6                               | 40.5         | 88,696                                             | 52.7         | 11,427                    | 6.8          |
| Middle                                                                                                                                                                                    | 257,600                   | 145,995               | 37.6                               | 56.7         | 95,133                                             | 36.9         | 16,472                    | 6.4          |
| Upper                                                                                                                                                                                     | 245,168                   | 162,416               | 41.8                               | 66.2         | 67,066                                             | 27.4         | 15,686                    | 6.4          |
| Unknown                                                                                                                                                                                   | 11,984                    | 2,028                 | 0.5                                | 16.9         | 8,389                                              | 70.0         | 1,567                     | 13.1         |
| <b>Total AA</b>                                                                                                                                                                           | <b>729,186</b>            | <b>388,695</b>        | <b>100.0</b>                       | <b>53.3</b>  | <b>290,949</b>                                     | <b>39.9</b>  | <b>49,542</b>             | <b>6.8</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 4,296                     | 3.8                   | 3,899                              | 3.7          | 349                                                | 5.3          | 48                        | 2.8          |
| Moderate                                                                                                                                                                                  | 19,691                    | 17.3                  | 18,104                             | 17.1         | 1,384                                              | 21.0         | 203                       | 11.8         |
| Middle                                                                                                                                                                                    | 33,259                    | 29.2                  | 31,067                             | 29.4         | 1,823                                              | 27.7         | 369                       | 21.4         |
| Upper                                                                                                                                                                                     | 53,245                    | 46.7                  | 49,496                             | 46.8         | 2,713                                              | 41.3         | 1,036                     | 60.0         |
| Unknown                                                                                                                                                                                   | 3,601                     | 3.2                   | 3,223                              | 3.0          | 307                                                | 4.7          | 71                        | 4.1          |
| <b>Total AA</b>                                                                                                                                                                           | <b>114,092</b>            | <b>100.0</b>          | <b>105,789</b>                     | <b>100.0</b> | <b>6,576</b>                                       | <b>100.0</b> | <b>1,727</b>              | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.7         |                                                    | 5.8          |                           | 1.5          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 31                        | 2.7                   | 29                                 | 2.5          | 2                                                  | 20.0         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 216                       | 18.6                  | 210                                | 18.3         | 6                                                  | 60.0         | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 347                       | 29.9                  | 347                                | 30.2         | 0                                                  | 0.0          | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 546                       | 47.1                  | 545                                | 47.4         | 1                                                  | 10.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 20                        | 1.7                   | 19                                 | 1.7          | 1                                                  | 10.0         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,160</b>              | <b>100.0</b>          | <b>1,150</b>                       | <b>100.0</b> | <b>10</b>                                          | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 99.1         |                                                    | 0.9          |                           | 0.0          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D155

| 2021 Combined Demographics<br>Assessment Area: Austin Metropolitan                                                      |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 35                        | 11.4                  | 31,879                             | 8.8       | 10,391                                             | 32.6      | 80,058                    | 22.1      |
| Moderate                                                                                                                | 61                        | 19.9                  | 61,300                             | 16.9      | 10,378                                             | 16.9      | 58,783                    | 16.2      |
| Middle                                                                                                                  | 109                       | 35.5                  | 133,878                            | 37.0      | 8,757                                              | 6.5       | 70,901                    | 19.6      |
| Upper                                                                                                                   | 96                        | 31.3                  | 133,405                            | 36.9      | 3,529                                              | 2.6       | 152,076                   | 42.0      |
| Unknown                                                                                                                 | 6                         | 2.0                   | 1,356                              | 0.4       | 723                                                | 53.3      | 0                         | 0.0       |
| Total AA                                                                                                                | 307                       | 100.0                 | 361,818                            | 100.0     | 33,778                                             | 9.3       | 361,818                   | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 70,447                    | 14,466                | 4.4                                | 20.5      | 49,572                                             | 70.4      | 6,409                     | 9.1       |
| Moderate                                                                                                                | 111,296                   | 49,968                | 15.0                               | 44.9      | 53,337                                             | 47.9      | 7,991                     | 7.2       |
| Middle                                                                                                                  | 233,702                   | 125,580               | 37.8                               | 53.7      | 92,054                                             | 39.4      | 16,068                    | 6.9       |
| Upper                                                                                                                   | 214,242                   | 141,494               | 42.6                               | 66.0      | 57,791                                             | 27.0      | 14,957                    | 7.0       |
| Unknown                                                                                                                 | 6,623                     | 712                   | 0.2                                | 10.8      | 5,039                                              | 76.1      | 872                       | 13.2      |
| Total AA                                                                                                                | 636,310                   | 332,220               | 100.0                              | 52.2      | 257,793                                            | 40.5      | 46,297                    | 7.3       |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 7,697                     | 7.0                   | 6,994                              | 6.8       | 636                                                | 9.8       | 67                        | 4.4       |
| Moderate                                                                                                                | 13,935                    | 12.6                  | 12,907                             | 12.6      | 898                                                | 13.8      | 130                       | 8.5       |
| Middle                                                                                                                  | 35,340                    | 32.1                  | 32,871                             | 32.2      | 2,070                                              | 31.9      | 399                       | 26.0      |
| Upper                                                                                                                   | 51,874                    | 47.1                  | 48,239                             | 47.2      | 2,765                                              | 42.6      | 870                       | 56.6      |
| Unknown                                                                                                                 | 1,379                     | 1.3                   | 1,186                              | 1.2       | 123                                                | 1.9       | 70                        | 4.6       |
| Total AA                                                                                                                | 110,225                   | 100.0                 | 102,197                            | 100.0     | 6,492                                              | 100.0     | 1,536                     | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 92.7      |                                                    | 5.9       |                           | 1.4       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         |                           |                       | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 41                        | 3.6                   | 38                                 | 3.3       | 3                                                  | 27.3      | 0                         | 0.0       |
| Moderate                                                                                                                | 151                       | 13.1                  | 146                                | 12.8      | 5                                                  | 45.5      | 0                         | 0.0       |
| Middle                                                                                                                  | 403                       | 34.9                  | 403                                | 35.3      | 0                                                  | 0.0       | 0                         | 0.0       |
| Upper                                                                                                                   | 554                       | 48.0                  | 552                                | 48.3      | 2                                                  | 18.2      | 0                         | 0.0       |
| Unknown                                                                                                                 | 5                         | 0.4                   | 4                                  | 0.3       | 1                                                  | 9.1       | 0                         | 0.0       |
| Total AA                                                                                                                | 1,154                     | 100.0                 | 1,143                              | 100.0     | 11                                                 | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 99.0      |                                                    | 1.0       |                           | 0.0       |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table D156

| 2020 Combined Demographics<br>Assessment Area: Austin Metropolitan                                                      |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 35                        | 11.4                  | 31,879                             | 8.8          | 10,391                                             | 32.6         | 80,058                    | 22.1         |
| Moderate                                                                                                                | 61                        | 19.9                  | 61,300                             | 16.9         | 10,378                                             | 16.9         | 58,783                    | 16.2         |
| Middle                                                                                                                  | 109                       | 35.5                  | 133,878                            | 37.0         | 8,757                                              | 6.5          | 70,901                    | 19.6         |
| Upper                                                                                                                   | 96                        | 31.3                  | 133,405                            | 36.9         | 3,529                                              | 2.6          | 152,076                   | 42.0         |
| Unknown                                                                                                                 | 6                         | 2.0                   | 1,356                              | 0.4          | 723                                                | 53.3         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>307</b>                | <b>100.0</b>          | <b>361,818</b>                     | <b>100.0</b> | <b>33,778</b>                                      | <b>9.3</b>   | <b>361,818</b>            | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 70,447                    | 14,466                | 4.4                                | 20.5         | 49,572                                             | 70.4         | 6,409                     | 9.1          |
| Moderate                                                                                                                | 111,296                   | 49,968                | 15.0                               | 44.9         | 53,337                                             | 47.9         | 7,991                     | 7.2          |
| Middle                                                                                                                  | 233,702                   | 125,580               | 37.8                               | 53.7         | 92,054                                             | 39.4         | 16,068                    | 6.9          |
| Upper                                                                                                                   | 214,242                   | 141,494               | 42.6                               | 66.0         | 57,791                                             | 27.0         | 14,957                    | 7.0          |
| Unknown                                                                                                                 | 6,623                     | 712                   | 0.2                                | 10.8         | 5,039                                              | 76.1         | 872                       | 13.2         |
| <b>Total AA</b>                                                                                                         | <b>636,310</b>            | <b>332,220</b>        | <b>100.0</b>                       | <b>52.2</b>  | <b>257,793</b>                                     | <b>40.5</b>  | <b>46,297</b>             | <b>7.3</b>   |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 7,578                     | 7.0                   | 6,873                              | 6.9          | 649                                                | 9.9          | 56                        | 3.9          |
| Moderate                                                                                                                | 13,700                    | 12.7                  | 12,671                             | 12.7         | 906                                                | 13.9         | 123                       | 8.5          |
| Middle                                                                                                                  | 34,523                    | 32.0                  | 32,089                             | 32.1         | 2,053                                              | 31.4         | 381                       | 26.4         |
| Upper                                                                                                                   | 50,639                    | 47.0                  | 47,016                             | 47.1         | 2,806                                              | 42.9         | 817                       | 56.7         |
| Unknown                                                                                                                 | 1,375                     | 1.3                   | 1,186                              | 1.2          | 124                                                | 1.9          | 65                        | 4.5          |
| <b>Total AA</b>                                                                                                         | <b>107,815</b>            | <b>100.0</b>          | <b>99,835</b>                      | <b>100.0</b> | <b>6,538</b>                                       | <b>100.0</b> | <b>1,442</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>92.6</b>  |                                                    | <b>6.1</b>   |                           | <b>1.3</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 44                        | 3.8                   | 40                                 | 3.5          | 3                                                  | 30.0         | 1                         | 100.0        |
| Moderate                                                                                                                | 146                       | 12.6                  | 141                                | 12.3         | 5                                                  | 50.0         | 0                         | 0.0          |
| Middle                                                                                                                  | 405                       | 34.9                  | 405                                | 35.3         | 0                                                  | 0.0          | 0                         | 0.0          |
| Upper                                                                                                                   | 559                       | 48.2                  | 558                                | 48.6         | 1                                                  | 10.0         | 0                         | 0.0          |
| Unknown                                                                                                                 | 5                         | 0.4                   | 4                                  | 0.3          | 1                                                  | 10.0         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>1,159</b>              | <b>100.0</b>          | <b>1,148</b>                       | <b>100.0</b> | <b>10</b>                                          | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>99.1</b>  |                                                    | <b>0.9</b>   |                           | <b>0.1</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

Table D157A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Austin Metropolitan                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 4.6   | 0       | 0.0   | 4.1   | 0    | 0.0   | 1.8   | 0       | 0.0   | 1.6   | 2.6                          |
| Moderate                                                                         | 0                                | 0.0   | 12.3  | 0       | 0.0   | 9.6   | 3    | 25.0  | 18.1  | 584     | 10.3  | 14.9  | 17.6                         |
| Middle                                                                           | 3                                | 75.0  | 46.3  | 845     | 65.9  | 37.9  | 2    | 16.7  | 43.4  | 533     | 9.4   | 36.9  | 37.6                         |
| Upper                                                                            | 1                                | 25.0  | 36.5  | 438     | 34.1  | 48.2  | 6    | 50.0  | 35.8  | 4,401   | 77.9  | 46.1  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 1    | 8.3   | 0.8   | 129     | 2.3   | 0.6   | 0.5                          |
| Total                                                                            | 4                                | 100.0 | 100.0 | 1,283   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 5,647   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.5   | 0       | 0.0   | 3.3   | 0    | 0.0   | 2.1   | 0       | 0.0   | 1.6   | 2.6                          |
| Moderate                                                                         | 3                                | 6.7   | 10.7  | 382     | 2.7   | 8.4   | 4    | 9.3   | 16.6  | 1,349   | 7.7   | 12.5  | 17.6                         |
| Middle                                                                           | 14                               | 31.1  | 38.7  | 3,255   | 22.9  | 32.3  | 8    | 18.6  | 39.7  | 2,715   | 15.5  | 30.6  | 37.6                         |
| Upper                                                                            | 28                               | 62.2  | 46.9  | 10,549  | 74.4  | 55.9  | 30   | 69.8  | 41.1  | 13,389  | 76.4  | 54.9  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 1    | 2.3   | 0.4   | 75      | 0.4   | 0.4   | 0.5                          |
| Total                                                                            | 45                               | 100.0 | 100.0 | 14,186  | 100.0 | 100.0 | 43   | 100.0 | 100.0 | 17,528  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.2   | 0       | 0.0   | 2.9   | 0    | 0.0   | 1.3   | 0       | 0.0   | 1.0   | 2.6                          |
| Moderate                                                                         | 2                                | 6.9   | 8.4   | 135     | 2.5   | 7.1   | 3    | 6.8   | 13.4  | 261     | 2.4   | 9.2   | 17.6                         |
| Middle                                                                           | 8                                | 27.6  | 33.5  | 1,404   | 25.9  | 27.6  | 15   | 34.1  | 31.4  | 2,367   | 21.7  | 21.0  | 37.6                         |
| Upper                                                                            | 19                               | 65.5  | 54.7  | 3,872   | 71.6  | 62.2  | 26   | 59.1  | 53.5  | 8,283   | 75.9  | 68.4  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 0.5                          |
| Total                                                                            | 29                               | 100.0 | 100.0 | 5,411   | 100.0 | 100.0 | 44   | 100.0 | 100.0 | 10,911  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 0                                | 0.0   | 20.7  | 0       | 0.0   | 11.3  | 0    | 0.0   | 13.1  | 0       | 0.0   | 11.7  | 12.0                         |
| Moderate                                                                         | 0                                | 0.0   | 24.3  | 0       | 0.0   | 24.7  | 1    | 100.0 | 29.0  | 32,200  | 100.0 | 30.5  | 27.5                         |
| Middle                                                                           | 0                                | 0.0   | 28.6  | 0       | 0.0   | 37.2  | 0    | 0.0   | 31.1  | 0       | 0.0   | 29.7  | 30.0                         |
| Upper                                                                            | 0                                | 0.0   | 23.6  | 0       | 0.0   | 24.1  | 0    | 0.0   | 23.0  | 0       | 0.0   | 25.1  | 27.1                         |
| Unknown                                                                          | 0                                | 0.0   | 2.9   | 0       | 0.0   | 2.7   | 0    | 0.0   | 3.8   | 0       | 0.0   | 2.9   | 3.4                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 1    | 100.0 | 100.0 | 32,200  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 2                                | 1.8   | 4.0   | 67      | 0.2   | 4.0   | 0    | 0.0   | 1.9   | 0       | 0.0   | 2.6   | 2.6                          |
| Moderate                                                                         | 5                                | 4.6   | 11.4  | 517     | 1.7   | 9.6   | 12   | 9.1   | 17.4  | 34,442  | 43.9  | 15.7  | 17.6                         |
| Middle                                                                           | 38                               | 34.9  | 41.9  | 6,780   | 22.9  | 35.0  | 35   | 26.5  | 41.4  | 7,454   | 9.5   | 33.9  | 37.6                         |
| Upper                                                                            | 64                               | 58.7  | 42.4  | 22,196  | 75.1  | 51.1  | 83   | 62.9  | 38.7  | 36,342  | 46.3  | 47.0  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 2    | 1.5   | 0.7   | 204     | 0.3   | 0.8   | 0.5                          |
| Total                                                                            | 109                              | 100.0 | 100.0 | 29,560  | 100.0 | 100.0 | 132  | 100.0 | 100.0 | 78,442  | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D157B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Austin Metropolitan                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 2                                | 6.7   | 2.6   | 67      | 1.4   | 1.6   | 0    | 0.0   | 1.4   | 0       | 0.0   | 0.6   | 2.6                          |
| Moderate                                                                         | 0                                | 0.0   | 4.5   | 0       | 0.0   | 2.3   | 1    | 3.2   | 8.6   | 48      | 0.6   | 4.6   | 17.6                         |
| Middle                                                                           | 13                               | 43.3  | 27.3  | 1,276   | 27.4  | 16.6  | 10   | 32.3  | 27.3  | 1,839   | 22.8  | 14.6  | 37.6                         |
| Upper                                                                            | 15                               | 50.0  | 65.4  | 3,307   | 71.1  | 79.3  | 20   | 64.5  | 62.4  | 6,189   | 76.6  | 79.9  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.5                          |
| Total                                                                            | 30                               | 100.0 | 100.0 | 4,650   | 100.0 | 100.0 | 31   | 100.0 | 100.0 | 8,076   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 2.4   | 0       | 0.0   | 1.3   | 0    | 0.0   | 1.5   | 0       | 0.0   | 0.6   | 2.6                          |
| Moderate                                                                         | 0                                | 0.0   | 8.8   | 0       | 0.0   | 3.6   | 0    | 0.0   | 13.2  | 0       | 0.0   | 6.1   | 17.6                         |
| Middle                                                                           | 0                                | 0.0   | 33.1  | 0       | 0.0   | 16.0  | 0    | 0.0   | 31.3  | 0       | 0.0   | 13.3  | 37.6                         |
| Upper                                                                            | 1                                | 100.0 | 55.5  | 4,030   | 100.0 | 79.0  | 1    | 100.0 | 53.3  | 4,080   | 100.0 | 79.2  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.7   | 0       | 0.0   | 0.8   | 0.5                          |
| Total                                                                            | 1                                | 100.0 | 100.0 | 4,030   | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 4,080   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 5.3   | 0       | 0.0   | 8.8   | 0    | 0.0   | 4.9   | 0       | 0.0   | 5.5   | 2.6                          |
| Moderate                                                                         | 0                                | 0.0   | 21.7  | 0       | 0.0   | 16.8  | 0    | 0.0   | 31.5  | 0       | 0.0   | 36.9  | 17.6                         |
| Middle                                                                           | 0                                | 0.0   | 49.9  | 0       | 0.0   | 43.4  | 0    | 0.0   | 44.3  | 0       | 0.0   | 30.4  | 37.6                         |
| Upper                                                                            | 0                                | 0.0   | 22.9  | 0       | 0.0   | 31.1  | 0    | 0.0   | 19.0  | 0       | 0.0   | 27.2  | 41.8                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.0   | 0.5                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D158A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Austin Metropolitan                                    |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.4   | 0       | 0.0   | 4.0   | 4.4                          |
| Moderate                                                                | 0                        | 0.0   | 12.5  | 0       | 0.0   | 10.0  | 15.0                         |
| Middle                                                                  | 4                        | 66.7  | 45.4  | 2,060   | 74.6  | 38.8  | 37.8                         |
| Upper                                                                   | 2                        | 33.3  | 37.5  | 700     | 25.4  | 47.1  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.1   | 0.2                          |
| Total                                                                   | 6                        | 100.0 | 100.0 | 2,760   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.3   | 0       | 0.0   | 3.0   | 4.4                          |
| Moderate                                                                | 3                        | 9.7   | 9.9   | 554     | 6.4   | 7.8   | 15.0                         |
| Middle                                                                  | 10                       | 32.3  | 35.7  | 1,361   | 15.8  | 30.0  | 37.8                         |
| Upper                                                                   | 18                       | 58.1  | 51.0  | 6,697   | 77.8  | 59.0  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.2                          |
| Total                                                                   | 31                       | 100.0 | 100.0 | 8,612   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 3.7   | 3.7   | 65      | 1.7   | 4.5   | 4.4                          |
| Moderate                                                                | 6                        | 22.2  | 8.1   | 762     | 19.6  | 6.4   | 15.0                         |
| Middle                                                                  | 6                        | 22.2  | 31.4  | 742     | 19.1  | 25.5  | 37.8                         |
| Upper                                                                   | 14                       | 51.9  | 56.6  | 2,322   | 59.7  | 63.5  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.2                          |
| Total                                                                   | 27                       | 100.0 | 100.0 | 3,891   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 17.0  | 0       | 0.0   | 17.0  |                              |
| Moderate                                                                | 0                        | 0.0   | 24.1  | 0       | 0.0   | 18.1  | 15.8                         |
| Middle                                                                  | 0                        | 0.0   | 39.0  | 0       | 0.0   | 39.2  | 34.4                         |
| Upper                                                                   | 0                        | 0.0   | 18.4  | 0       | 0.0   | 25.5  | 24.8                         |
| Unknown                                                                 | 0                        | 0.0   | 1.4   | 0       | 0.0   | 0.2   | 2.8                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 1                        | 1.1   | 3.8   | 65      | 0.3   | 4.1   |                              |
| Moderate                                                                | 11                       | 12.4  | 11.3  | 1,519   | 7.1   | 9.3   | 15.0                         |
| Middle                                                                  | 27                       | 30.3  | 40.0  | 4,618   | 21.7  | 34.3  | 37.8                         |
| Upper                                                                   | 50                       | 56.2  | 44.7  | 15,054  | 70.8  | 52.2  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.2   | 0       | 0.0   | 0.2   | 0.2                          |
| Total                                                                   | 89                       | 100.0 | 100.0 | 21,256  | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |



Table D158B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Austin Metropolitan                                    |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                           |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 2.1   | 0       | 0.0   | 1.4   | 4.4                          |
| Moderate                                                                | 2                        | 8.7   | 5.0   | 203     | 6.2   | 2.1   | 15.0                         |
| Middle                                                                  | 7                        | 30.4  | 24.0  | 455     | 13.8  | 15.0  | 37.8                         |
| Upper                                                                   | 14                       | 60.9  | 68.9  | 2,635   | 80.0  | 81.4  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.2                          |
| Total                                                                   | 23                       | 100.0 | 100.0 | 3,293   | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                             |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 3.1   | 0       | 0.0   | 1.2   | 4.4                          |
| Moderate                                                                | 0                        | 0.0   | 10.6  | 0       | 0.0   | 4.2   | 15.0                         |
| Middle                                                                  | 0                        | 0.0   | 34.3  | 0       | 0.0   | 14.8  | 37.8                         |
| Upper                                                                   | 2                        | 100.0 | 51.5  | 2,700   | 100.0 | 77.5  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.5   | 0       | 0.0   | 2.2   | 0.2                          |
| Total                                                                   | 2                        | 100.0 | 100.0 | 2,700   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 4.0   | 0       | 0.0   | 3.1   | 4.4                          |
| Moderate                                                                | 0                        | 0.0   | 22.7  | 0       | 0.0   | 14.5  | 15.0                         |
| Middle                                                                  | 0                        | 0.0   | 48.6  | 0       | 0.0   | 42.5  | 37.8                         |
| Upper                                                                   | 0                        | 0.0   | 24.4  | 0       | 0.0   | 39.4  | 42.6                         |
| Unknown                                                                 | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.4   | 0.2                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table D159

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Austin Metropolitan                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                   | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                               | 22                               | 13.0  | 7.1   | 4,875   | 18.1  | 8.3   | 8    | 4.3   | 3.5   | 1,163   | 3.0   | 3.6   | 3.8                      |
| Moderate                                                                          | 23                               | 13.6  | 12.7  | 5,298   | 19.7  | 12.6  | 44   | 23.9  | 18.0  | 12,211  | 31.3  | 18.3  | 17.3                     |
| Middle                                                                            | 42                               | 24.9  | 33.4  | 6,729   | 25.0  | 32.6  | 42   | 22.8  | 30.8  | 10,188  | 26.1  | 28.5  | 29.2                     |
| Upper                                                                             | 82                               | 48.5  | 45.3  | 9,972   | 37.1  | 45.2  | 78   | 42.4  | 45.1  | 12,814  | 32.9  | 46.9  | 46.7                     |
| Unknown                                                                           | 0                                | 0.0   | 0.9   | 0       | 0.0   | 1.2   | 12   | 6.5   | 2.1   | 2,626   | 6.7   | 2.5   | 3.2                      |
| Total                                                                             | 169                              | 100.0 | 100.0 | 26,874  | 100.0 | 100.0 | 184  | 100.0 | 100.0 | 39,002  | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

Table D160

| Distribution of 2020 Small Business Lending by Income Level of Geography |                          |       |       |         |       |       |                          |
|--------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Austin Metropolitan                                     |                          |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                            | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                          | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| Low                                                                      | 23                       | 8.6   | 7.5   | 4,672   | 11.0  | 8.8   | 7.0                      |
| Moderate                                                                 | 32                       | 12.0  | 12.5  | 5,607   | 13.1  | 12.6  | 12.7                     |
| Middle                                                                   | 82                       | 30.7  | 32.4  | 14,497  | 34.0  | 30.9  | 32.0                     |
| Upper                                                                    | 125                      | 46.8  | 46.1  | 16,752  | 39.3  | 46.0  | 47.0                     |
| Unknown                                                                  | 5                        | 1.9   | 0.9   | 1,137   | 2.7   | 1.2   | 1.3                      |
| Total                                                                    | 267                      | 100.0 | 100.0 | 42,665  | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data                                           |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                               |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                  |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.           |                          |       |       |         |       |       |                          |

Table D161A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Austin Metropolitan                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 2.0   | 0       | 0.0   | 0.9   | 1    | 8.3   | 1.7   | 146     | 2.6   | 0.7   | 20.4                              |
| Moderate                                                                     | 1                                | 25.0  | 11.4  | 217     | 16.9  | 7.2   | 2    | 16.7  | 9.9   | 267     | 4.7   | 6.1   | 16.8                              |
| Middle                                                                       | 1                                | 25.0  | 17.5  | 513     | 40.0  | 14.1  | 2    | 16.7  | 19.2  | 393     | 7.0   | 15.6  | 20.8                              |
| Upper                                                                        | 2                                | 50.0  | 48.5  | 553     | 43.1  | 58.7  | 7    | 58.3  | 49.3  | 4,841   | 85.7  | 58.2  | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 20.6  | 0       | 0.0   | 19.2  | 0    | 0.0   | 19.9  | 0       | 0.0   | 19.5  | 0.0                               |
| Total                                                                        | 4                                | 100.0 | 100.0 | 1,283   | 100.0 | 100.0 | 12   | 100.0 | 100.0 | 5,647   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 3                                | 6.7   | 3.4   | 412     | 2.9   | 1.9   | 3    | 7.0   | 7.6   | 240     | 1.4   | 4.0   | 20.4                              |
| Moderate                                                                     | 5                                | 11.1  | 12.5  | 771     | 5.4   | 8.3   | 3    | 7.0   | 16.7  | 877     | 5.0   | 10.5  | 16.8                              |
| Middle                                                                       | 7                                | 15.6  | 18.7  | 1,473   | 10.4  | 15.5  | 7    | 16.3  | 20.7  | 1,762   | 10.1  | 16.0  | 20.8                              |
| Upper                                                                        | 27                               | 60.0  | 44.9  | 10,936  | 77.1  | 53.9  | 28   | 65.1  | 42.1  | 13,989  | 79.8  | 53.2  | 42.0                              |
| Unknown                                                                      | 3                                | 6.7   | 20.4  | 594     | 4.2   | 20.4  | 2    | 4.7   | 13.0  | 660     | 3.8   | 16.2  | 0.0                               |
| Total                                                                        | 45                               | 100.0 | 100.0 | 14,186  | 100.0 | 100.0 | 43   | 100.0 | 100.0 | 17,528  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 6.9   | 3.0   | 123     | 2.3   | 1.4   | 1    | 2.3   | 5.3   | 100     | 0.9   | 2.6   | 20.4                              |
| Moderate                                                                     | 0                                | 0.0   | 10.0  | 0       | 0.0   | 6.6   | 0    | 0.0   | 10.8  | 0       | 0.0   | 5.6   | 16.8                              |
| Middle                                                                       | 6                                | 20.7  | 17.6  | 630     | 11.6  | 13.2  | 11   | 25.0  | 19.2  | 1,267   | 11.6  | 12.1  | 20.8                              |
| Upper                                                                        | 21                               | 72.4  | 65.9  | 4,658   | 86.1  | 72.5  | 31   | 70.5  | 63.3  | 9,444   | 86.6  | 76.9  | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 3.4   | 0       | 0.0   | 6.4   | 1    | 2.3   | 1.5   | 100     | 0.9   | 2.8   | 0.0                               |
| Total                                                                        | 29                               | 100.0 | 100.0 | 5,411   | 100.0 | 100.0 | 44   | 100.0 | 100.0 | 10,911  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 7                                | 6.4   | 2.8   | 665     | 2.2   | 1.3   | 5    | 3.8   | 3.6   | 486     | 1.1   | 1.6   | 20.4                              |
| Moderate                                                                     | 7                                | 6.4   | 11.9  | 1,082   | 3.7   | 7.6   | 8    | 6.1   | 11.8  | 1,496   | 3.2   | 7.0   | 16.8                              |
| Middle                                                                       | 18                               | 16.5  | 18.0  | 3,280   | 11.1  | 14.5  | 26   | 19.8  | 19.5  | 3,976   | 8.6   | 15.3  | 20.8                              |
| Upper                                                                        | 73                               | 67.0  | 47.0  | 23,899  | 80.8  | 56.7  | 88   | 67.2  | 48.1  | 39,490  | 85.4  | 57.5  | 42.0                              |
| Unknown                                                                      | 4                                | 3.7   | 20.4  | 634     | 2.1   | 19.8  | 4    | 3.1   | 17.1  | 794     | 1.7   | 18.6  | 0.0                               |
| Total                                                                        | 109                              | 100.0 | 100.0 | 29,560  | 100.0 | 100.0 | 131  | 100.0 | 100.0 | 46,242  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D161B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Austin Metropolitan                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 6.7   | 4.1   | 130     | 2.8   | 3.0   | 0    | 0.0   | 4.0   | 0       | 0.0   | 2.8   | 20.4                              |
| Moderate                                                                     | 1                                | 3.3   | 7.1   | 94      | 2.0   | 3.4   | 3    | 9.7   | 8.1   | 352     | 4.4   | 3.2   | 16.8                              |
| Middle                                                                       | 4                                | 13.3  | 12.0  | 664     | 14.3  | 5.7   | 6    | 19.4  | 17.0  | 554     | 6.9   | 8.0   | 20.8                              |
| Upper                                                                        | 22                               | 73.3  | 72.9  | 3,722   | 80.0  | 83.2  | 21   | 67.7  | 66.0  | 7,136   | 88.4  | 76.2  | 42.0                              |
| Unknown                                                                      | 1                                | 3.3   | 3.9   | 40      | 0.9   | 4.7   | 1    | 3.2   | 4.9   | 34      | 0.4   | 9.8   | 0.0                               |
| Total                                                                        | 30                               | 100.0 | 100.0 | 4,650   | 100.0 | 100.0 | 31   | 100.0 | 100.0 | 8,076   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 4.4   | 0       | 0.0   | 1.7   | 0    | 0.0   | 6.0   | 0       | 0.0   | 2.6   | 20.4                              |
| Moderate                                                                     | 0                                | 0.0   | 8.9   | 0       | 0.0   | 2.4   | 0    | 0.0   | 13.2  | 0       | 0.0   | 4.5   | 16.8                              |
| Middle                                                                       | 0                                | 0.0   | 13.9  | 0       | 0.0   | 4.7   | 0    | 0.0   | 19.6  | 0       | 0.0   | 6.8   | 20.8                              |
| Upper                                                                        | 1                                | 100.0 | 65.3  | 4,030   | 100.0 | 74.0  | 1    | 100.0 | 56.0  | 4,080   | 100.0 | 65.5  | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 7.5   | 0       | 0.0   | 17.2  | 0    | 0.0   | 5.3   | 0       | 0.0   | 20.6  | 0.0                               |
| Total                                                                        | 1                                | 100.0 | 100.0 | 4,030   | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 4,080   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.8   | 0       | 0.0   | 0.3   | 0    | 0.0   | 3.3   | 0       | 0.0   | 0.8   | 20.4                              |
| Moderate                                                                     | 0                                | 0.0   | 1.4   | 0       | 0.0   | 0.8   | 0    | 0.0   | 0.3   | 0       | 0.0   | 0.1   | 16.8                              |
| Middle                                                                       | 0                                | 0.0   | 0.5   | 0       | 0.0   | 0.4   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.8                              |
| Upper                                                                        | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.8   | 0    | 0.0   | 0.5   | 0       | 0.0   | 1.0   | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 97.1  | 0       | 0.0   | 97.6  | 0    | 0.0   | 95.9  | 0       | 0.0   | 98.0  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table D162A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level       |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Austin Metropolitan                                      |                          |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                               | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                           | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                       |                          |       |       |         |       |       |                                   |
| Low                                                                       | 0                        | 0.0   | 3.9   | 0       | 0.0   | 2.0   | 22.1                              |
| Moderate                                                                  | 0                        | 0.0   | 18.5  | 0       | 0.0   | 12.7  | 16.2                              |
| Middle                                                                    | 0                        | 0.0   | 22.1  | 0       | 0.0   | 19.2  | 19.6                              |
| Upper                                                                     | 6                        | 100.0 | 45.7  | 2,760   | 100.0 | 54.9  | 42.0                              |
| Unknown                                                                   | 0                        | 0.0   | 9.8   | 0       | 0.0   | 11.2  | 0.0                               |
| Total                                                                     | 6                        | 100.0 | 100.0 | 2,760   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                           |                          |       |       |         |       |       |                                   |
| Low                                                                       | 1                        | 3.2   | 2.7   | 95      | 1.1   | 1.4   | 22.1                              |
| Moderate                                                                  | 8                        | 25.8  | 11.2  | 1,277   | 14.8  | 7.5   | 16.2                              |
| Middle                                                                    | 3                        | 9.7   | 19.3  | 855     | 9.9   | 16.2  | 19.6                              |
| Upper                                                                     | 16                       | 51.6  | 49.2  | 5,962   | 69.2  | 57.1  | 42.0                              |
| Unknown                                                                   | 3                        | 9.7   | 17.7  | 423     | 4.9   | 17.8  | 0.0                               |
| Total                                                                     | 31                       | 100.0 | 100.0 | 8,612   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                       | 1                        | 3.7   | 3.7   | 133     | 3.4   | 2.3   | 22.1                              |
| Moderate                                                                  | 5                        | 18.5  | 11.8  | 682     | 17.5  | 7.8   | 16.2                              |
| Middle                                                                    | 2                        | 7.4   | 17.9  | 155     | 4.0   | 15.4  | 19.6                              |
| Upper                                                                     | 18                       | 66.7  | 65.2  | 2,846   | 73.1  | 72.0  | 42.0                              |
| Unknown                                                                   | 1                        | 3.7   | 1.4   | 75      | 1.9   | 2.5   | 0.0                               |
| Total                                                                     | 27                       | 100.0 | 100.0 | 3,891   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                       | 5                        | 5.6   | 3.2   | 362     | 1.7   | 1.7   | 22.1                              |
| Moderate                                                                  | 15                       | 16.9  | 14.2  | 2,162   | 10.2  | 9.8   | 16.2                              |
| Middle                                                                    | 5                        | 5.6   | 20.0  | 1,010   | 4.8   | 17.3  | 19.6                              |
| Upper                                                                     | 60                       | 67.4  | 47.1  | 17,224  | 81.0  | 55.8  | 42.0                              |
| Unknown                                                                   | 4                        | 4.5   | 15.5  | 498     | 2.3   | 15.4  | 0.0                               |
| Total                                                                     | 89                       | 100.0 | 100.0 | 21,256  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table D162B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level |                          |       |       |         |       |       |                                   |
|---------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Austin Metropolitan                                |                          |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                         | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                     | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                     | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                       |                          |       |       |         |       |       |                                   |
| Low                                                                 | 3                        | 13.0  | 6.2   | 134     | 4.1   | 3.0   | 22.1                              |
| Moderate                                                            | 2                        | 8.7   | 10.9  | 203     | 6.2   | 6.4   | 16.2                              |
| Middle                                                              | 0                        | 0.0   | 12.6  | 0       | 0.0   | 6.4   | 19.6                              |
| Upper                                                               | 18                       | 78.3  | 68.9  | 2,956   | 89.8  | 83.4  | 42.0                              |
| Unknown                                                             | 0                        | 0.0   | 1.4   | 0       | 0.0   | 0.8   | 0.0                               |
| Total                                                               | 23                       | 100.0 | 100.0 | 3,293   | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                         |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 5.3   | 0       | 0.0   | 1.8   | 22.1                              |
| Moderate                                                            | 0                        | 0.0   | 13.3  | 0       | 0.0   | 4.9   | 16.2                              |
| Middle                                                              | 0                        | 0.0   | 14.9  | 0       | 0.0   | 4.6   | 19.6                              |
| Upper                                                               | 2                        | 100.0 | 58.5  | 2,700   | 100.0 | 73.7  | 42.0                              |
| Unknown                                                             | 0                        | 0.0   | 7.9   | 0       | 0.0   | 14.9  | 0.0                               |
| Total                                                               | 2                        | 100.0 | 100.0 | 2,700   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                              |                          |       |       |         |       |       |                                   |
| Low                                                                 | 0                        | 0.0   | 0.7   | 0       | 0.0   | 0.4   | 22.1                              |
| Moderate                                                            | 0                        | 0.0   | 1.2   | 0       | 0.0   | 1.0   | 16.2                              |
| Middle                                                              | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.5   | 19.6                              |
| Upper                                                               | 0                        | 0.0   | 0.6   | 0       | 0.0   | 1.3   | 42.0                              |
| Unknown                                                             | 0                        | 0.0   | 97.1  | 0       | 0.0   | 96.8  | 0.0                               |
| Total                                                               | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                      |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey             |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.      |                          |       |       |         |       |       |                                   |

Table D163

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|--|
| Assessment Area: Austin Metropolitan                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |  |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |  |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |  |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |  |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| \$1 Million or Less                                                                | 60                               | 35.5  | 45.2  | 6,366   | 23.7  | 27.4  | 47   | 25.5  | 48.9  | 4,678   | 12.0  | 33.7  | 92.7                     |  |
| Over \$1 Million                                                                   | 60                               | 35.5  |       | 15,740  | 58.6  |       | 90   | 48.9  |       | 27,697  | 71.0  |       | 5.8                      |  |
| Revenue Unknown                                                                    | 49                               | 29.0  |       | 4,768   | 17.7  |       | 47   | 25.5  |       | 6,627   | 17.0  |       | 1.5                      |  |
| Total                                                                              | 169                              | 100.0 |       | 26,874  | 100.0 |       | 184  | 100.0 |       | 39,002  | 100.0 |       | 100.0                    |  |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| \$100,000 or Less                                                                  | 106                              | 62.7  | 92.6  | 4,724   | 17.6  | 37.2  | 101  | 54.9  | 94.8  | 5,272   | 13.5  | 43.8  |                          |  |
| \$100,001 - \$250,000                                                              | 29                               | 17.2  | 4.1   | 5,309   | 19.8  | 17.3  | 34   | 18.5  | 2.8   | 6,621   | 17.0  | 14.9  |                          |  |
| \$250,001 - \$1 Million                                                            | 34                               | 20.1  | 3.3   | 16,841  | 62.7  | 45.5  | 49   | 26.6  | 2.4   | 27,109  | 69.5  | 41.3  |                          |  |
| Total                                                                              | 169                              | 100.0 | 100.0 | 26,874  | 100.0 | 100.0 | 184  | 100.0 | 100.0 | 39,002  | 100.0 | 100.0 |                          |  |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| \$100,000 or Less                                                                  | 42                               | 70.0  |       | 1,414   | 22.2  |       | 33   | 70.2  |       | 1,486   | 31.8  |       |                          |  |
| \$100,001 - \$250,000                                                              | 13                               | 21.7  |       | 2,227   | 35.0  |       | 9    | 19.1  |       | 1,487   | 31.8  |       |                          |  |
| \$250,001 - \$1 Million                                                            | 5                                | 8.3   |       | 2,725   | 42.8  |       | 5    | 10.6  |       | 1,705   | 36.4  |       |                          |  |
| Total                                                                              | 60                               | 100.0 |       | 6,366   | 100.0 |       | 47   | 100.0 |       | 4,678   | 100.0 |       |                          |  |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |  |

Table D164

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Austin Metropolitan                                      |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 142                      | 53.2  | 39.3  | 12,486  | 29.3  | 25.0  | 92.6                     |
| Over \$1 Million                                                          | 78                       | 29.2  |       | 22,716  | 53.2  |       | 6.1                      |
| Revenue Unknown                                                           | 47                       | 17.6  |       | 7,463   | 17.5  |       | 1.3                      |
| Total                                                                     | 267                      | 100.0 |       | 42,665  | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 171                      | 64.0  | 88.6  | 6,712   | 15.7  | 34.7  |                          |
| \$100,001 - \$250,000                                                     | 45                       | 16.9  | 6.7   | 7,975   | 18.7  | 20.5  |                          |
| \$250,001 - \$1 Million                                                   | 51                       | 19.1  | 4.7   | 27,978  | 65.6  | 44.8  |                          |
| Total                                                                     | 267                      | 100.0 | 100.0 | 42,665  | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 110                      | 77.5  |       | 3,823   | 30.6  |       |                          |
| \$100,001 - \$250,000                                                     | 20                       | 14.1  |       | 3,576   | 28.6  |       |                          |
| \$250,001 - \$1 Million                                                   | 12                       | 8.5   |       | 5,087   | 40.7  |       |                          |
| Total                                                                     | 142                      | 100.0 |       | 12,486  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table D165

| 2022 Combined Demographics<br>Assessment Area: Houston Metropolitan                                                                                                                       |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 215                       | 13.8                  | 168,037                            | 10.2         | 54,180                                             | 32.2         | 389,059                   | 23.6         |
| Moderate                                                                                                                                                                                  | 385                       | 24.6                  | 377,238                            | 22.9         | 60,353                                             | 16.0         | 273,834                   | 16.6         |
| Middle                                                                                                                                                                                    | 408                       | 26.1                  | 472,141                            | 28.6         | 36,171                                             | 7.7          | 294,579                   | 17.8         |
| Upper                                                                                                                                                                                     | 505                       | 32.3                  | 614,325                            | 37.2         | 20,536                                             | 3.3          | 693,387                   | 42.0         |
| Unknown                                                                                                                                                                                   | 49                        | 3.1                   | 19,118                             | 1.2          | 4,477                                              | 23.4         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,562</b>              | <b>100.0</b>          | <b>1,650,859</b>                   | <b>100.0</b> | <b>175,717</b>                                     | <b>10.6</b>  | <b>1,650,859</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              |                                                    | Rental       |                           | Vacant       |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 297,280                   | 71,836                | 5.1                                | 24.2         | 187,981                                            | 63.2         | 37,463                    | 12.6         |
| Moderate                                                                                                                                                                                  | 604,210                   | 274,443               | 19.4                               | 45.4         | 273,153                                            | 45.2         | 56,614                    | 9.4          |
| Middle                                                                                                                                                                                    | 714,369                   | 428,552               | 30.3                               | 60.0         | 224,956                                            | 31.5         | 60,861                    | 8.5          |
| Upper                                                                                                                                                                                     | 903,672                   | 625,964               | 44.3                               | 69.3         | 211,220                                            | 23.4         | 66,488                    | 7.4          |
| Unknown                                                                                                                                                                                   | 48,212                    | 12,289                | 0.9                                | 25.5         | 28,761                                             | 59.7         | 7,162                     | 14.9         |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,567,743</b>          | <b>1,413,084</b>      | <b>100.0</b>                       | <b>55.0</b>  | <b>926,071</b>                                     | <b>36.1</b>  | <b>228,588</b>            | <b>8.9</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or =                     |              | Over \$1 Million                                   |              | Revenue Not               |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 32,585                    | 8.9                   | 29,507                             | 8.7          | 2,842                                              | 11.7         | 236                       | 5.3          |
| Moderate                                                                                                                                                                                  | 72,249                    | 19.6                  | 65,975                             | 19.5         | 5,700                                              | 23.4         | 574                       | 12.9         |
| Middle                                                                                                                                                                                    | 93,438                    | 25.4                  | 87,016                             | 25.7         | 5,518                                              | 22.7         | 904                       | 20.3         |
| Upper                                                                                                                                                                                     | 163,076                   | 44.3                  | 150,745                            | 44.5         | 9,682                                              | 39.8         | 2,649                     | 59.6         |
| Unknown                                                                                                                                                                                   | 6,387                     | 1.7                   | 5,734                              | 1.7          | 569                                                | 2.3          | 84                        | 1.9          |
| <b>Total AA</b>                                                                                                                                                                           | <b>367,735</b>            | <b>100.0</b>          | <b>338,977</b>                     | <b>100.0</b> | <b>24,311</b>                                      | <b>100.0</b> | <b>4,447</b>              | <b>100.0</b> |
| Percentage of Total Businesses:                                                                                                                                                           |                           |                       |                                    | 92.2         |                                                    | 6.6          |                           | 1.2          |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 87                        | 3.5                   | 84                                 | 3.5          | 3                                                  | 7.3          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 315                       | 12.8                  | 302                                | 12.5         | 12                                                 | 29.3         | 1                         | 16.7         |
| Middle                                                                                                                                                                                    | 713                       | 29.0                  | 699                                | 29.0         | 10                                                 | 24.4         | 4                         | 66.7         |
| Upper                                                                                                                                                                                     | 1,307                     | 53.2                  | 1,291                              | 53.6         | 15                                                 | 36.6         | 1                         | 16.7         |
| Unknown                                                                                                                                                                                   | 34                        | 1.4                   | 33                                 | 1.4          | 1                                                  | 2.4          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,456</b>              | <b>100.0</b>          | <b>2,409</b>                       | <b>100.0</b> | <b>41</b>                                          | <b>100.0</b> | <b>6</b>                  | <b>100.0</b> |
| Percentage of Total Farms:                                                                                                                                                                |                           |                       |                                    | 98.1         |                                                    | 1.7          |                           | 0.2          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |



Table D166

| 2021 Combined Demographics<br>Assessment Area: Houston Metropolitan                                                                                                                       |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 158                       | 15.2                  | 159,612                            | 10.8         | 57,230                                             | 35.9         | 362,116                   | 24.4         |
| Moderate                                                                                                                                                                                  | 302                       | 29.1                  | 358,696                            | 24.2         | 70,103                                             | 19.5         | 238,045                   | 16.0         |
| Middle                                                                                                                                                                                    | 258                       | 24.8                  | 406,320                            | 27.4         | 41,170                                             | 10.1         | 252,221                   | 17.0         |
| Upper                                                                                                                                                                                     | 312                       | 30.0                  | 556,835                            | 37.5         | 21,449                                             | 3.9          | 631,386                   | 42.6         |
| Unknown                                                                                                                                                                                   | 9                         | 0.9                   | 2,305                              | 0.2          | 999                                                | 43.3         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,039</b>              | <b>100.0</b>          | <b>1,483,768</b>                   | <b>100.0</b> | <b>190,951</b>                                     | <b>12.9</b>  | <b>1,483,768</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 291,630                   | 67,997                | 5.4                                | 23.3         | 178,152                                            | 61.1         | 45,481                    | 15.6         |
| Moderate                                                                                                                                                                                  | 584,643                   | 265,840               | 21.0                               | 45.5         | 253,118                                            | 43.3         | 65,685                    | 11.2         |
| Middle                                                                                                                                                                                    | 616,393                   | 363,015               | 28.6                               | 58.9         | 202,026                                            | 32.8         | 51,352                    | 8.3          |
| Upper                                                                                                                                                                                     | 831,143                   | 569,614               | 44.9                               | 68.5         | 200,009                                            | 24.1         | 61,520                    | 7.4          |
| Unknown                                                                                                                                                                                   | 6,183                     | 789                   | 0.1                                | 12.8         | 4,770                                              | 77.1         | 624                       | 10.1         |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,329,992</b>          | <b>1,267,255</b>      | <b>100.0</b>                       | <b>54.4</b>  | <b>838,075</b>                                     | <b>36.0</b>  | <b>224,662</b>            | <b>9.6</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or =                     |              | Over \$1 Million                                   |              | Revenue Not               |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 35,090                    | 9.9                   | 31,319                             | 9.6          | 3,531                                              | 14.5         | 240                       | 6.3          |
| Moderate                                                                                                                                                                                  | 66,930                    | 18.9                  | 61,066                             | 18.8         | 5,403                                              | 22.2         | 461                       | 12.1         |
| Middle                                                                                                                                                                                    | 83,628                    | 23.6                  | 77,723                             | 23.9         | 5,213                                              | 21.4         | 692                       | 18.2         |
| Upper                                                                                                                                                                                     | 167,432                   | 47.3                  | 154,856                            | 47.6         | 10,172                                             | 41.8         | 2,404                     | 63.2         |
| Unknown                                                                                                                                                                                   | 647                       | 0.2                   | 596                                | 0.2          | 44                                                 | 0.2          | 7                         | 0.2          |
| <b>Total AA</b>                                                                                                                                                                           | <b>353,727</b>            | <b>100.0</b>          | <b>325,560</b>                     | <b>100.0</b> | <b>24,363</b>                                      | <b>100.0</b> | <b>3,804</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>92.0</b>  |                                                    | <b>6.9</b>   |                           | <b>1.1</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 86                        | 3.6                   | 81                                 | 3.4          | 5                                                  | 12.5         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 274                       | 11.4                  | 263                                | 11.1         | 9                                                  | 22.5         | 2                         | 28.6         |
| Middle                                                                                                                                                                                    | 734                       | 30.4                  | 719                                | 30.4         | 11                                                 | 27.5         | 4                         | 57.1         |
| Upper                                                                                                                                                                                     | 1,315                     | 54.5                  | 1,299                              | 54.9         | 15                                                 | 37.5         | 1                         | 14.3         |
| Unknown                                                                                                                                                                                   | 3                         | 0.1                   | 3                                  | 0.1          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,412</b>              | <b>100.0</b>          | <b>2,365</b>                       | <b>100.0</b> | <b>40</b>                                          | <b>100.0</b> | <b>7</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>98.1</b>  |                                                    | <b>1.7</b>   |                           | <b>0.3</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D167

| 2020 Combined Demographics<br>Assessment Area: Houston Metropolitan                                                                                                                       |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 158                       | 15.2                  | 159,612                            | 10.8         | 57,230                                             | 35.9         | 362,116                   | 24.4         |
| Moderate                                                                                                                                                                                  | 302                       | 29.1                  | 358,696                            | 24.2         | 70,103                                             | 19.5         | 238,045                   | 16.0         |
| Middle                                                                                                                                                                                    | 258                       | 24.8                  | 406,320                            | 27.4         | 41,170                                             | 10.1         | 252,221                   | 17.0         |
| Upper                                                                                                                                                                                     | 312                       | 30.0                  | 556,835                            | 37.5         | 21,449                                             | 3.9          | 631,386                   | 42.6         |
| Unknown                                                                                                                                                                                   | 9                         | 0.9                   | 2,305                              | 0.2          | 999                                                | 43.3         | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>1,039</b>              | <b>100.0</b>          | <b>1,483,768</b>                   | <b>100.0</b> | <b>190,951</b>                                     | <b>12.9</b>  | <b>1,483,768</b>          | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 291,630                   | 67,997                | 5.4                                | 23.3         | 178,152                                            | 61.1         | 45,481                    | 15.6         |
| Moderate                                                                                                                                                                                  | 584,643                   | 265,840               | 21.0                               | 45.5         | 253,118                                            | 43.3         | 65,685                    | 11.2         |
| Middle                                                                                                                                                                                    | 616,393                   | 363,015               | 28.6                               | 58.9         | 202,026                                            | 32.8         | 51,352                    | 8.3          |
| Upper                                                                                                                                                                                     | 831,143                   | 569,614               | 44.9                               | 68.5         | 200,009                                            | 24.1         | 61,520                    | 7.4          |
| Unknown                                                                                                                                                                                   | 6,183                     | 789                   | 0.1                                | 12.8         | 4,770                                              | 77.1         | 624                       | 10.1         |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,329,992</b>          | <b>1,267,255</b>      | <b>100.0</b>                       | <b>54.4</b>  | <b>838,075</b>                                     | <b>36.0</b>  | <b>224,662</b>            | <b>9.6</b>   |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or =                     |              | Over \$1 Million                                   |              | Revenue Not               |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 33,903                    | 9.9                   | 30,011                             | 9.6          | 3,683                                              | 14.7         | 209                       | 5.8          |
| Moderate                                                                                                                                                                                  | 64,848                    | 19.0                  | 58,841                             | 18.8         | 5,571                                              | 22.3         | 436                       | 12.1         |
| Middle                                                                                                                                                                                    | 80,016                    | 23.4                  | 74,026                             | 23.6         | 5,320                                              | 21.3         | 670                       | 18.5         |
| Upper                                                                                                                                                                                     | 162,543                   | 47.5                  | 149,870                            | 47.8         | 10,378                                             | 41.5         | 2,295                     | 63.5         |
| Unknown                                                                                                                                                                                   | 634                       | 0.2                   | 577                                | 0.2          | 50                                                 | 0.2          | 7                         | 0.2          |
| <b>Total AA</b>                                                                                                                                                                           | <b>341,944</b>            | <b>100.0</b>          | <b>313,325</b>                     | <b>100.0</b> | <b>25,002</b>                                      | <b>100.0</b> | <b>3,617</b>              | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>91.6</b>  |                                                    | <b>7.3</b>   |                           | <b>1.1</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 87                        | 3.6                   | 82                                 | 3.5          | 5                                                  | 12.5         | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 264                       | 10.9                  | 253                                | 10.7         | 9                                                  | 22.5         | 2                         | 25.0         |
| Middle                                                                                                                                                                                    | 738                       | 30.5                  | 722                                | 30.5         | 11                                                 | 27.5         | 5                         | 62.5         |
| Upper                                                                                                                                                                                     | 1,324                     | 54.8                  | 1,308                              | 55.2         | 15                                                 | 37.5         | 1                         | 12.5         |
| Unknown                                                                                                                                                                                   | 3                         | 0.1                   | 3                                  | 0.1          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>2,416</b>              | <b>100.0</b>          | <b>2,368</b>                       | <b>100.0</b> | <b>40</b>                                          | <b>100.0</b> | <b>8</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>98.0</b>  |                                                    | <b>1.7</b>   |                           | <b>0.3</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table D168A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Houston Metropolitan                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 2                                | 8.3   | 3.0   | 251     | 4.1   | 2.2   | 1    | 5.9   | 3.7   | 170     | 2.6   | 2.5   | 5.1                          |
| Moderate                                                                         | 3                                | 12.5  | 13.9  | 756     | 12.2  | 10.0  | 5    | 29.4  | 15.5  | 766     | 11.7  | 10.9  | 19.4                         |
| Middle                                                                           | 6                                | 25.0  | 28.3  | 972     | 15.7  | 22.7  | 3    | 17.6  | 31.9  | 395     | 6.0   | 27.7  | 30.3                         |
| Upper                                                                            | 13                               | 54.2  | 54.6  | 4,198   | 68.0  | 64.9  | 8    | 47.1  | 47.9  | 5,215   | 79.7  | 58.0  | 44.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0    | 0.0   | 1.0   | 0       | 0.0   | 0.9   | 0.9                          |
| Total                                                                            | 24                               | 100.0 | 100.0 | 6,177   | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 6,546   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 9                                | 4.3   | 2.1   | 1,273   | 2.5   | 1.5   | 9    | 4.6   | 3.1   | 1,094   | 2.7   | 2.0   | 5.1                          |
| Moderate                                                                         | 31                               | 14.9  | 10.1  | 3,594   | 7.2   | 7.0   | 37   | 18.8  | 15.0  | 4,483   | 10.9  | 9.9   | 19.4                         |
| Middle                                                                           | 56                               | 26.9  | 24.6  | 9,593   | 19.1  | 18.9  | 64   | 32.5  | 31.1  | 11,906  | 29.0  | 24.8  | 30.3                         |
| Upper                                                                            | 111                              | 53.4  | 63.2  | 35,303  | 70.2  | 72.5  | 86   | 43.7  | 50.0  | 23,384  | 56.9  | 62.6  | 44.3                         |
| Unknown                                                                          | 1                                | 0.5   | 0.0   | 500     | 1.0   | 0.0   | 1    | 0.5   | 0.9   | 194     | 0.5   | 0.8   | 0.9                          |
| Total                                                                            | 208                              | 100.0 | 100.0 | 50,263  | 100.0 | 100.0 | 197  | 100.0 | 100.0 | 41,061  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 4                                | 4.8   | 2.5   | 333     | 3.2   | 1.9   | 8    | 7.6   | 2.8   | 806     | 5.5   | 2.2   | 5.1                          |
| Moderate                                                                         | 19                               | 22.9  | 11.7  | 1,714   | 16.5  | 8.9   | 17   | 16.2  | 10.8  | 1,286   | 8.8   | 7.9   | 19.4                         |
| Middle                                                                           | 16                               | 19.3  | 19.1  | 1,790   | 17.2  | 14.6  | 22   | 21.0  | 23.6  | 2,913   | 19.8  | 19.2  | 30.3                         |
| Upper                                                                            | 44                               | 53.0  | 66.7  | 6,579   | 63.2  | 74.6  | 57   | 54.3  | 62.0  | 9,587   | 65.3  | 70.1  | 44.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 1    | 1.0   | 0.7   | 100     | 0.7   | 0.7   | 0.9                          |
| Total                                                                            | 83                               | 100.0 | 100.0 | 10,416  | 100.0 | 100.0 | 105  | 100.0 | 100.0 | 14,692  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                              | 2                                | 100.0 | 22.7  | 1,400   | 100.0 | 16.5  | 0    | 0.0   | 19.5  | 0       | 0.0   | 12.7  | 22.9                         |
| Moderate                                                                         | 0                                | 0.0   | 31.1  | 0       | 0.0   | 23.3  | 0    | 0.0   | 28.1  | 0       | 0.0   | 20.1  | 26.4                         |
| Middle                                                                           | 0                                | 0.0   | 19.1  | 0       | 0.0   | 20.8  | 0    | 0.0   | 21.9  | 0       | 0.0   | 28.2  | 21.2                         |
| Upper                                                                            | 0                                | 0.0   | 26.9  | 0       | 0.0   | 38.5  | 1    | 100.0 | 26.9  | 54,205  | 100.0 | 33.7  | 25.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.2   | 0       | 0.0   | 0.8   | 0    | 0.0   | 3.5   | 0       | 0.0   | 5.3   | 4.2                          |
| Total                                                                            | 2                                | 100.0 | 100.0 | 1,400   | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 54,205  | 100.0 | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                              | 23                               | 5.2   | 2.6   | 3,835   | 4.3   | 2.8   | 23   | 4.9   | 3.6   | 2,428   | 1.7   | 3.8   | 5.1                          |
| Moderate                                                                         | 79                               | 17.8  | 12.3  | 9,147   | 10.2  | 9.6   | 80   | 17.2  | 15.3  | 8,892   | 6.2   | 11.9  | 19.4                         |
| Middle                                                                           | 103                              | 23.2  | 26.6  | 14,767  | 16.5  | 21.0  | 139  | 29.8  | 31.4  | 22,888  | 16.0  | 27.1  | 30.3                         |
| Upper                                                                            | 238                              | 53.6  | 58.4  | 61,318  | 68.5  | 66.4  | 218  | 46.8  | 48.8  | 107,620 | 75.1  | 55.8  | 44.3                         |
| Unknown                                                                          | 1                                | 0.2   | 0.1   | 500     | 0.6   | 0.1   | 6    | 1.3   | 0.9   | 1,392   | 1.0   | 1.4   | 0.9                          |
| Total                                                                            | 444                              | 100.0 | 100.0 | 89,567  | 100.0 | 100.0 | 466  | 100.0 | 100.0 | 143,220 | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D168B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Houston Metropolitan                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | %     | %     | \$(000) | \$%   | \$%   | #    | %     | %     | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 6                                | 4.9   | 1.7   | 578     | 3.2   | 1.1   | 5    | 3.5   | 1.8   | 358     | 1.5   | 1.5   | 5.1                          |
| Moderate                                                                         | 26                               | 21.1  | 7.7   | 3,083   | 17.3  | 5.3   | 20   | 13.9  | 7.1   | 2,237   | 9.2   | 4.9   | 19.4                         |
| Middle                                                                           | 25                               | 20.3  | 18.1  | 2,412   | 13.5  | 12.5  | 50   | 34.7  | 21.3  | 7,674   | 31.6  | 15.7  | 30.3                         |
| Upper                                                                            | 66                               | 53.7  | 72.4  | 11,767  | 66.0  | 81.1  | 65   | 45.1  | 69.2  | 12,909  | 53.2  | 77.6  | 44.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 4    | 2.8   | 0.6   | 1,098   | 4.5   | 0.3   | 0.9                          |
| Total                                                                            | 123                              | 100.0 | 100.0 | 17,840  | 100.0 | 100.0 | 144  | 100.0 | 100.0 | 24,276  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.4   | 0       | 0.0   | 1.8   | 0    | 0.0   | 2.9   | 0       | 0.0   | 1.8   | 5.1                          |
| Moderate                                                                         | 0                                | 0.0   | 13.8  | 0       | 0.0   | 6.1   | 1    | 50.0  | 14.6  | 120     | 4.9   | 8.1   | 19.4                         |
| Middle                                                                           | 0                                | 0.0   | 25.9  | 0       | 0.0   | 14.1  | 0    | 0.0   | 29.2  | 0       | 0.0   | 18.7  | 30.3                         |
| Upper                                                                            | 4                                | 100.0 | 56.9  | 3,471   | 100.0 | 78.0  | 1    | 50.0  | 52.7  | 2,320   | 95.1  | 70.4  | 44.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.6   | 0       | 0.0   | 1.0   | 0.9                          |
| Total                                                                            | 4                                | 100.0 | 100.0 | 3,471   | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 2,440   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 3.3   | 0       | 0.0   | 2.1   | 0    | 0.0   | 4.1   | 0       | 0.0   | 6.7   | 5.1                          |
| Moderate                                                                         | 0                                | 0.0   | 20.5  | 0       | 0.0   | 14.6  | 0    | 0.0   | 25.8  | 0       | 0.0   | 18.7  | 19.4                         |
| Middle                                                                           | 0                                | 0.0   | 40.5  | 0       | 0.0   | 38.9  | 0    | 0.0   | 39.9  | 0       | 0.0   | 35.7  | 30.3                         |
| Upper                                                                            | 0                                | 0.0   | 35.7  | 0       | 0.0   | 44.4  | 0    | 0.0   | 29.3  | 0       | 0.0   | 38.1  | 44.3                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.8   | 0.9                          |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table D169A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Houston Metropolitan                                   |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 1                        | 3.2   | 2.8   | 96      | 1.5   | 2.2   | 5.4                          |
| Moderate                                                                | 6                        | 19.4  | 12.7  | 797     | 12.3  | 9.3   | 21.0                         |
| Middle                                                                  | 6                        | 19.4  | 27.5  | 960     | 14.8  | 22.0  | 28.6                         |
| Upper                                                                   | 18                       | 58.1  | 56.9  | 4,636   | 71.4  | 66.5  | 44.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                   | 31                       | 100.0 | 100.0 | 6,489   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 12                       | 4.6   | 1.9   | 1,570   | 3.3   | 1.5   | 5.4                          |
| Moderate                                                                | 42                       | 16.2  | 8.8   | 5,381   | 11.2  | 6.2   | 21.0                         |
| Middle                                                                  | 66                       | 25.5  | 22.0  | 10,163  | 21.1  | 17.1  | 28.6                         |
| Upper                                                                   | 139                      | 53.7  | 67.2  | 31,076  | 64.5  | 75.0  | 44.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 259                      | 100.0 | 100.0 | 48,190  | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 4                        | 4.5   | 2.1   | 272     | 2.3   | 1.5   | 5.4                          |
| Moderate                                                                | 10                       | 11.2  | 11.5  | 1,040   | 8.7   | 8.8   | 21.0                         |
| Middle                                                                  | 25                       | 28.1  | 20.4  | 2,157   | 18.0  | 16.3  | 28.6                         |
| Upper                                                                   | 50                       | 56.2  | 66.0  | 8,500   | 71.0  | 73.4  | 44.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 89                       | 100.0 | 100.0 | 11,969  | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 21.7  | 0       | 0.0   | 15.6  | 25.3                         |
| Moderate                                                                | 0                        | 0.0   | 30.5  | 0       | 0.0   | 21.0  | 27.6                         |
| Middle                                                                  | 0                        | 0.0   | 21.1  | 0       | 0.0   | 22.5  | 21.2                         |
| Upper                                                                   | 0                        | 0.0   | 26.8  | 0       | 0.0   | 41.0  | 25.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.7                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 20                       | 4.1   | 2.4   | 2,157   | 2.5   | 2.4   | 5.4                          |
| Moderate                                                                | 79                       | 16.0  | 11.2  | 9,244   | 10.9  | 8.5   | 21.0                         |
| Middle                                                                  | 131                      | 26.6  | 25.4  | 17,152  | 20.3  | 20.1  | 28.6                         |
| Upper                                                                   | 263                      | 53.3  | 60.9  | 56,104  | 66.3  | 69.0  | 44.9                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                   | 493                      | 100.0 | 100.0 | 84,657  | 100.0 | 100.0 | 100.0                        |

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table D169B**

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Houston Metropolitan                                            |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 3                        | 2.7   | 2.2   | 219     | 1.5   | 1.6   | 5.4                          |
| Moderate                                                                                                                                                    | 21                       | 19.1  | 9.3   | 2,026   | 13.4  | 4.9   | 21.0                         |
| Middle                                                                                                                                                      | 32                       | 29.1  | 18.4  | 3,535   | 23.4  | 11.6  | 28.6                         |
| Upper                                                                                                                                                       | 54                       | 49.1  | 70.0  | 9,297   | 61.7  | 81.8  | 44.9                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.1   | 0.1                          |
| Total                                                                                                                                                       | 110                      | 100.0 | 100.0 | 15,077  | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.8   | 0       | 0.0   | 1.4   | 5.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 13.3  | 0       | 0.0   | 7.4   | 21.0                         |
| Middle                                                                                                                                                      | 2                        | 50.0  | 26.6  | 337     | 11.5  | 17.8  | 28.6                         |
| Upper                                                                                                                                                       | 2                        | 50.0  | 57.2  | 2,595   | 88.5  | 73.4  | 44.9                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.1   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 4                        | 100.0 | 100.0 | 2,932   | 100.0 | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                        | 0.0   | 2.7   | 0       | 0.0   | 1.7   | 5.4                          |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 19.7  | 0       | 0.0   | 14.2  | 21.0                         |
| Middle                                                                                                                                                      | 0                        | 0.0   | 40.0  | 0       | 0.0   | 34.3  | 28.6                         |
| Upper                                                                                                                                                       | 0                        | 0.0   | 37.6  | 0       | 0.0   | 49.8  | 44.9                         |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.1                          |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                              |

**Table D170**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Houston Metropolitan                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                   | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                               | 177                              | 16.9  | 9.5   | 35,093  | 17.7  | 11.7  | 87   | 12.9  | 8.0   | 20,443  | 13.6  | 9.3   | 8.9                      |
| Moderate                                                                          | 273                              | 26.1  | 18.2  | 52,076  | 26.2  | 19.3  | 181  | 26.9  | 18.2  | 48,069  | 31.9  | 20.2  | 19.6                     |
| Middle                                                                            | 234                              | 22.4  | 23.8  | 47,247  | 23.8  | 22.7  | 160  | 23.8  | 25.4  | 31,445  | 20.9  | 24.2  | 25.4                     |
| Upper                                                                             | 361                              | 34.5  | 47.9  | 64,162  | 32.3  | 46.0  | 233  | 34.7  | 46.4  | 49,515  | 32.8  | 44.6  | 44.3                     |
| Unknown                                                                           | 1                                | 0.1   | 0.1   | 84      | 0.0   | 0.1   | 11   | 1.6   | 1.5   | 1,323   | 0.9   | 1.5   | 1.7                      |
| Total                                                                             | 1,046                            | 100.0 | 100.0 | 198,662 | 100.0 | 100.0 | 672  | 100.0 | 100.0 | 150,795 | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table D171**

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Houston Metropolitan                                                                         |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| <b>Low</b>                                                                                                                                                                                | 260                      | 14.9  | 9.9   | 50,072  | 19.4  | 11.9  | 9.9                      |
| <b>Moderate</b>                                                                                                                                                                           | 446                      | 25.6  | 17.8  | 65,845  | 25.5  | 18.5  | 19.0                     |
| <b>Middle</b>                                                                                                                                                                             | 417                      | 23.9  | 23.0  | 58,159  | 22.5  | 22.5  | 23.4                     |
| <b>Upper</b>                                                                                                                                                                              | 617                      | 35.4  | 48.8  | 82,900  | 32.1  | 46.6  | 47.5                     |
| <b>Unknown</b>                                                                                                                                                                            | 4                        | 0.2   | 0.1   | 1,322   | 0.5   | 0.1   | 0.2                      |
| <b>Total</b>                                                                                                                                                                              | 1,744                    | 100.0 | 100.0 | 258,298 | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table D172A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Houston Metropolitan                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 2                                | 8.3   | 2.3   | 100     | 1.6   | 1.1   | 0    | 0.0   | 2.6   | 0       | 0.0   | 1.2   | 23.6                              |
| Moderate                                                                     | 2                                | 8.3   | 14.2  | 299     | 4.8   | 9.5   | 3    | 17.6  | 13.9  | 420     | 6.4   | 9.1   | 16.6                              |
| Middle                                                                       | 5                                | 20.8  | 20.5  | 1,000   | 16.2  | 17.0  | 4    | 23.5  | 20.3  | 752     | 11.5  | 16.8  | 17.8                              |
| Upper                                                                        | 15                               | 62.5  | 40.6  | 4,778   | 77.4  | 52.8  | 8    | 47.1  | 40.6  | 4,825   | 73.7  | 52.2  | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 22.4  | 0       | 0.0   | 19.6  | 2    | 11.8  | 22.6  | 549     | 8.4   | 20.7  | 0.0                               |
| Total                                                                        | 24                               | 100.0 | 100.0 | 6,177   | 100.0 | 100.0 | 17   | 100.0 | 100.0 | 6,546   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 17                               | 8.2   | 2.5   | 1,298   | 2.6   | 1.2   | 27   | 13.7  | 6.9   | 2,736   | 6.7   | 3.5   | 23.6                              |
| Moderate                                                                     | 37                               | 17.8  | 9.4   | 4,352   | 8.7   | 5.6   | 43   | 21.8  | 16.7  | 6,272   | 15.3  | 10.8  | 16.6                              |
| Middle                                                                       | 45                               | 21.6  | 16.7  | 7,131   | 14.2  | 12.2  | 38   | 19.3  | 21.0  | 6,441   | 15.7  | 16.4  | 17.8                              |
| Upper                                                                        | 98                               | 47.1  | 48.5  | 34,953  | 69.5  | 58.5  | 85   | 43.1  | 41.7  | 25,123  | 61.2  | 54.4  | 42.0                              |
| Unknown                                                                      | 11                               | 5.3   | 23.1  | 2,529   | 5.0   | 22.5  | 4    | 2.0   | 13.8  | 489     | 1.2   | 14.9  | 0.0                               |
| Total                                                                        | 208                              | 100.0 | 100.0 | 50,263  | 100.0 | 100.0 | 197  | 100.0 | 100.0 | 41,061  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 9                                | 10.8  | 4.2   | 470     | 4.5   | 2.2   | 12   | 11.4  | 5.2   | 854     | 5.8   | 3.1   | 23.6                              |
| Moderate                                                                     | 11                               | 13.3  | 8.6   | 814     | 7.8   | 6.0   | 22   | 21.0  | 10.9  | 2,693   | 18.3  | 7.6   | 16.6                              |
| Middle                                                                       | 16                               | 19.3  | 15.6  | 1,778   | 17.1  | 11.8  | 22   | 21.0  | 16.6  | 2,577   | 17.5  | 12.3  | 17.8                              |
| Upper                                                                        | 47                               | 56.6  | 69.0  | 7,354   | 70.6  | 76.1  | 48   | 45.7  | 65.2  | 8,532   | 58.1  | 74.5  | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 2.6   | 0       | 0.0   | 3.8   | 1    | 1.0   | 2.1   | 36      | 0.2   | 2.5   | 0.0                               |
| Total                                                                        | 83                               | 100.0 | 100.0 | 10,416  | 100.0 | 100.0 | 105  | 100.0 | 100.0 | 14,692  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 47                               | 10.6  | 2.4   | 3,265   | 3.7   | 1.1   | 63   | 13.5  | 3.7   | 5,678   | 6.4   | 1.7   | 23.6                              |
| Moderate                                                                     | 76                               | 17.2  | 11.8  | 7,959   | 9.0   | 7.8   | 88   | 18.9  | 14.3  | 11,929  | 13.4  | 9.3   | 16.6                              |
| Middle                                                                       | 92                               | 20.8  | 18.4  | 13,553  | 15.4  | 14.8  | 94   | 20.2  | 20.1  | 14,187  | 15.9  | 16.6  | 17.8                              |
| Upper                                                                        | 214                              | 48.4  | 44.2  | 60,616  | 68.8  | 55.2  | 210  | 45.2  | 41.5  | 55,909  | 62.8  | 52.8  | 42.0                              |
| Unknown                                                                      | 13                               | 2.9   | 23.1  | 2,774   | 3.1   | 21.1  | 10   | 2.2   | 20.5  | 1,312   | 1.5   | 19.6  | 0.0                               |
| Total                                                                        | 442                              | 100.0 | 100.0 | 88,167  | 100.0 | 100.0 | 465  | 100.0 | 100.0 | 89,015  | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |



Table D172B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Houston Metropolitan                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 18                               | 14.6  | 4.4   | 1,309   | 7.3   | 1.9   | 23   | 16.0  | 4.6   | 1,968   | 8.1   | 2.9   | 23.6                              |
| Moderate                                                                     | 26                               | 21.1  | 8.5   | 2,494   | 14.0  | 5.0   | 20   | 13.9  | 10.5  | 2,544   | 10.5  | 5.9   | 16.6                              |
| Middle                                                                       | 26                               | 21.1  | 13.8  | 3,644   | 20.4  | 8.7   | 30   | 20.8  | 14.6  | 4,417   | 18.2  | 9.9   | 17.8                              |
| Upper                                                                        | 51                               | 41.5  | 70.6  | 10,148  | 56.9  | 81.7  | 68   | 47.2  | 65.6  | 15,109  | 62.2  | 77.0  | 42.0                              |
| Unknown                                                                      | 2                                | 1.6   | 2.7   | 245     | 1.4   | 2.7   | 3    | 2.1   | 4.7   | 238     | 1.0   | 4.3   | 0.0                               |
| Total                                                                        | 123                              | 100.0 | 100.0 | 17,840  | 100.0 | 100.0 | 144  | 100.0 | 100.0 | 24,276  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 1                                | 25.0  | 5.6   | 88      | 2.5   | 2.8   | 1    | 50.0  | 7.8   | 120     | 4.9   | 4.5   | 23.6                              |
| Moderate                                                                     | 0                                | 0.0   | 13.6  | 0       | 0.0   | 6.8   | 0    | 0.0   | 16.2  | 0       | 0.0   | 9.0   | 16.6                              |
| Middle                                                                       | 0                                | 0.0   | 17.7  | 0       | 0.0   | 9.0   | 0    | 0.0   | 19.3  | 0       | 0.0   | 11.1  | 17.8                              |
| Upper                                                                        | 3                                | 75.0  | 57.1  | 3,383   | 97.5  | 69.9  | 1    | 50.0  | 50.5  | 2,320   | 95.1  | 63.8  | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 6.1   | 0       | 0.0   | 11.4  | 0    | 0.0   | 6.2   | 0       | 0.0   | 11.7  | 0.0                               |
| Total                                                                        | 4                                | 100.0 | 100.0 | 3,471   | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 2,440   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.6   | 0       | 0.0   | 0.3   | 0    | 0.0   | 1.4   | 0       | 0.0   | 0.8   | 23.6                              |
| Moderate                                                                     | 0                                | 0.0   | 0.9   | 0       | 0.0   | 0.7   | 0    | 0.0   | 1.3   | 0       | 0.0   | 1.1   | 16.6                              |
| Middle                                                                       | 0                                | 0.0   | 0.3   | 0       | 0.0   | 0.3   | 0    | 0.0   | 0.4   | 0       | 0.0   | 0.4   | 17.8                              |
| Upper                                                                        | 0                                | 0.0   | 0.4   | 0       | 0.0   | 0.5   | 0    | 0.0   | 0.2   | 0       | 0.0   | 0.3   | 42.0                              |
| Unknown                                                                      | 0                                | 0.0   | 97.8  | 0       | 0.0   | 98.3  | 0    | 0.0   | 96.7  | 0       | 0.0   | 97.4  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

**Table D173A**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Houston Metropolitan                                                                                                                             |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 2                        | 6.5   | 3.1   | 224     | 3.5   | 1.5   | 24.4                              |
| Moderate                                                                                                                                                                                                                                 | 10                       | 32.3  | 18.6  | 1,511   | 23.3  | 12.5  | 16.0                              |
| Middle                                                                                                                                                                                                                                   | 9                        | 29.0  | 23.6  | 1,999   | 30.8  | 19.8  | 17.0                              |
| Upper                                                                                                                                                                                                                                    | 6                        | 19.4  | 44.5  | 1,581   | 24.4  | 56.1  | 42.6                              |
| Unknown                                                                                                                                                                                                                                  | 4                        | 12.9  | 10.2  | 1,174   | 18.1  | 10.1  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 31                       | 100.0 | 100.0 | 6,489   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 29                       | 11.2  | 1.8   | 2,649   | 5.5   | 0.8   | 24.4                              |
| Moderate                                                                                                                                                                                                                                 | 47                       | 18.1  | 7.7   | 5,382   | 11.2  | 4.5   | 16.0                              |
| Middle                                                                                                                                                                                                                                   | 51                       | 19.7  | 15.0  | 7,759   | 16.1  | 11.0  | 17.0                              |
| Upper                                                                                                                                                                                                                                    | 118                      | 45.6  | 54.1  | 29,466  | 61.1  | 63.1  | 42.6                              |
| Unknown                                                                                                                                                                                                                                  | 14                       | 5.4   | 21.3  | 2,934   | 6.1   | 20.6  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 259                      | 100.0 | 100.0 | 48,190  | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 11                       | 12.4  | 3.7   | 787     | 6.6   | 1.9   | 24.4                              |
| Moderate                                                                                                                                                                                                                                 | 13                       | 14.6  | 9.8   | 1,041   | 8.7   | 6.7   | 16.0                              |
| Middle                                                                                                                                                                                                                                   | 22                       | 24.7  | 15.7  | 2,689   | 22.5  | 11.6  | 17.0                              |
| Upper                                                                                                                                                                                                                                    | 41                       | 46.1  | 67.6  | 7,090   | 59.2  | 75.2  | 42.6                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 2.2   | 3.2   | 362     | 3.0   | 4.6   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 89                       | 100.0 | 100.0 | 11,969  | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 53                       | 10.8  | 2.4   | 4,476   | 5.3   | 1.2   | 24.4                              |
| Moderate                                                                                                                                                                                                                                 | 94                       | 19.1  | 12.7  | 10,578  | 12.5  | 8.4   | 16.0                              |
| Middle                                                                                                                                                                                                                                   | 101                      | 20.5  | 18.5  | 14,680  | 17.3  | 15.1  | 17.0                              |
| Upper                                                                                                                                                                                                                                    | 222                      | 45.0  | 47.4  | 50,319  | 59.4  | 58.3  | 42.6                              |
| Unknown                                                                                                                                                                                                                                  | 23                       | 4.7   | 18.9  | 4,604   | 5.4   | 17.0  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 493                      | 100.0 | 100.0 | 84,657  | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table D173B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Houston Metropolitan                                                |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 11                       | 10.0  | 5.0   | 816     | 5.4   | 1.8   | 24.4                              |
| Moderate                                                                                                                                                    | 23                       | 20.9  | 10.4  | 2,544   | 16.9  | 5.2   | 16.0                              |
| Middle                                                                                                                                                      | 19                       | 17.3  | 15.5  | 2,233   | 14.8  | 9.1   | 17.0                              |
| Upper                                                                                                                                                       | 54                       | 49.1  | 65.1  | 9,350   | 62.0  | 81.2  | 42.6                              |
| Unknown                                                                                                                                                     | 3                        | 2.7   | 3.9   | 134     | 0.9   | 2.6   | 0.0                               |
| Total                                                                                                                                                       | 110                      | 100.0 | 100.0 | 15,077  | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 5.4   | 0       | 0.0   | 2.3   | 24.4                              |
| Moderate                                                                                                                                                    | 1                        | 25.0  | 13.0  | 100     | 3.4   | 6.5   | 16.0                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 18.0  | 0       | 0.0   | 10.9  | 17.0                              |
| Upper                                                                                                                                                       | 3                        | 75.0  | 54.0  | 2,832   | 96.6  | 67.5  | 42.6                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 9.6   | 0       | 0.0   | 12.7  | 0.0                               |
| Total                                                                                                                                                       | 4                        | 100.0 | 100.0 | 2,932   | 100.0 | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.3   | 0       | 0.0   | 0.2   | 24.4                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.5   | 16.0                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.6   | 0       | 0.0   | 0.7   | 17.0                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 0.4   | 0       | 0.0   | 0.6   | 42.6                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 98.1  | 0       | 0.0   | 98.1  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

Table D174

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-------|--------------------------|
| Assessment Area: Houston Metropolitan                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |       |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |       |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| \$1 Million or Less                                                                | 416                              | 39.8  | 42.3  | 56,704  | 28.5  | 27.1  | 265  | 39.4  | 50.2  | 38,635  | 25.6  | 34.9  | 92.2  |                          |
| Over \$1 Million                                                                   | 386                              | 36.9  |       | 117,009 | 58.9  |       | 335  | 49.9  |       | 101,983 | 67.6  |       | 6.6   |                          |
| Revenue Unknown                                                                    | 244                              | 23.3  |       | 24,949  | 12.6  |       | 72   | 10.7  |       | 10,177  | 6.7   |       | 1.2   |                          |
| Total                                                                              | 1,046                            | 100.0 |       | 198,662 | 100.0 |       | 672  | 100.0 |       | 150,795 | 100.0 |       | 100.0 |                          |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| \$100,000 or Less                                                                  | 568                              | 54.3  | 92.7  | 24,425  | 12.3  | 37.6  | 335  | 49.9  | 94.7  | 16,923  | 11.2  | 41.7  |       |                          |
| \$100,001 - \$250,000                                                              | 232                              | 22.2  | 4.0   | 42,466  | 21.4  | 17.3  | 143  | 21.3  | 2.8   | 28,171  | 18.7  | 14.8  |       |                          |
| \$250,001 - \$1 Million                                                            | 246                              | 23.5  | 3.3   | 131,771 | 66.3  | 45.2  | 194  | 28.9  | 2.5   | 105,701 | 70.1  | 43.5  |       |                          |
| Total                                                                              | 1,046                            | 100.0 | 100.0 | 198,662 | 100.0 | 100.0 | 672  | 100.0 | 100.0 | 150,795 | 100.0 | 100.0 |       |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| \$100,000 or Less                                                                  | 277                              | 66.6  |       | 11,527  | 20.3  |       | 173  | 65.3  |       | 7,725   | 20.0  |       |       |                          |
| \$100,001 - \$250,000                                                              | 79                               | 19.0  |       | 13,574  | 23.9  |       | 49   | 18.5  |       | 8,973   | 23.2  |       |       |                          |
| \$250,001 - \$1 Million                                                            | 60                               | 14.4  |       | 31,603  | 55.7  |       | 43   | 16.2  |       | 21,937  | 56.8  |       |       |                          |
| Total                                                                              | 416                              | 100.0 |       | 56,704  | 100.0 |       | 265  | 100.0 |       | 38,635  | 100.0 |       |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |       |                          |

Table D175

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Houston Metropolitan                                     |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | %     | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 971                      | 55.7  | 37.6  | 79,990  | 31.0  | 23.7  | 91.6                     |
| Over \$1 Million                                                          | 515                      | 29.5  |       | 147,449 | 57.1  |       | 7.3                      |
| Revenue Unknown                                                           | 258                      | 14.8  |       | 30,859  | 11.9  |       | 1.1                      |
| Total                                                                     | 1,744                    | 100.0 |       | 258,298 | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 1,119                    | 64.2  | 88.8  | 40,037  | 15.5  | 33.4  |                          |
| \$100,001 - \$250,000                                                     | 312                      | 17.9  | 6.4   | 55,858  | 21.6  | 19.5  |                          |
| \$250,001 - \$1 Million                                                   | 313                      | 17.9  | 4.9   | 162,403 | 62.9  | 47.1  |                          |
| Total                                                                     | 1,744                    | 100.0 | 100.0 | 258,298 | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 780                      | 80.3  |       | 26,170  | 32.7  |       |                          |
| \$100,001 - \$250,000                                                     | 123                      | 12.7  |       | 20,458  | 25.6  |       |                          |
| \$250,001 - \$1 Million                                                   | 68                       | 7.0   |       | 33,362  | 41.7  |       |                          |
| Total                                                                     | 971                      | 100.0 |       | 79,990  | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

**APPENDIX E: NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS**

**Table E1**

| 2022 Combined Demographics<br>Assessment Area: Lenawee County Nonmetropolitan                                                                                                             |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 4,048                     | 15.7         |
| Moderate                                                                                                                                                                                  | 5                         | 20.0                  | 4,184                              | 16.2         | 894                                                | 21.4         | 4,905                     | 19.0         |
| Middle                                                                                                                                                                                    | 14                        | 56.0                  | 13,669                             | 52.9         | 873                                                | 6.4          | 5,581                     | 21.6         |
| Upper                                                                                                                                                                                     | 6                         | 24.0                  | 7,998                              | 30.9         | 276                                                | 3.5          | 11,317                    | 43.8         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>25</b>                 | <b>100.0</b>          | <b>25,851</b>                      | <b>100.0</b> | <b>2,043</b>                                       | <b>7.9</b>   | <b>25,851</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 8,883                     | 4,407                 | 14.6                               | 49.6         | 3,443                                              | 38.8         | 1,033                     | 11.6         |
| Middle                                                                                                                                                                                    | 22,886                    | 16,101                | 53.5                               | 70.4         | 4,135                                              | 18.1         | 2,650                     | 11.6         |
| Upper                                                                                                                                                                                     | 12,125                    | 9,608                 | 31.9                               | 79.2         | 999                                                | 8.2          | 1,518                     | 12.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>43,894</b>             | <b>30,116</b>         | <b>100.0</b>                       | <b>68.6</b>  | <b>8,577</b>                                       | <b>19.5</b>  | <b>5,201</b>              | <b>11.8</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 800                       | 22.2                  | 724                                | 21.8         | 70                                                 | 30.8         | 6                         | 11.5         |
| Middle                                                                                                                                                                                    | 1,871                     | 51.9                  | 1,737                              | 52.2         | 110                                                | 48.5         | 24                        | 46.2         |
| Upper                                                                                                                                                                                     | 936                       | 25.9                  | 867                                | 26.1         | 47                                                 | 20.7         | 22                        | 42.3         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,607</b>              | <b>100.0</b>          | <b>3,328</b>                       | <b>100.0</b> | <b>227</b>                                         | <b>100.0</b> | <b>52</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>92.3</b>  |                                                    | <b>6.3</b>   |                           | <b>1.4</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 2                         | 0.6                   | 2                                  | 0.6          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 187                       | 58.6                  | 183                                | 58.8         | 4                                                  | 50.0         | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 130                       | 40.8                  | 126                                | 40.5         | 4                                                  | 50.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>319</b>                | <b>100.0</b>          | <b>311</b>                         | <b>100.0</b> | <b>8</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>97.5</b>  |                                                    | <b>2.5</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table E2**

| 2021 Combined Demographics<br>Assessment Area: Lenawee County Nonmetropolitan                                                                                                             |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 4,132                     | 16.4         |
| Moderate                                                                                                                                                                                  | 4                         | 17.4                  | 3,035                              | 12.1         | 793                                                | 26.1         | 4,368                     | 17.4         |
| Middle                                                                                                                                                                                    | 13                        | 56.5                  | 13,842                             | 55.1         | 1,186                                              | 8.6          | 5,202                     | 20.7         |
| Upper                                                                                                                                                                                     | 6                         | 26.1                  | 8,257                              | 32.9         | 438                                                | 5.3          | 11,432                    | 45.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>23</b>                 | <b>100.0</b>          | <b>25,134</b>                      | <b>100.0</b> | <b>2,417</b>                                       | <b>9.6</b>   | <b>25,134</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 6,694                     | 2,963                 | 10.2                               | 44.3         | 2,935                                              | 43.8         | 796                       | 11.9         |
| Middle                                                                                                                                                                                    | 24,176                    | 16,447                | 56.4                               | 68.0         | 4,005                                              | 16.6         | 3,724                     | 15.4         |
| Upper                                                                                                                                                                                     | 12,542                    | 9,770                 | 33.5                               | 77.9         | 1,844                                              | 14.7         | 928                       | 7.4          |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>43,412</b>             | <b>29,180</b>         | <b>100.0</b>                       | <b>67.2</b>  | <b>8,784</b>                                       | <b>20.2</b>  | <b>5,448</b>              | <b>12.5</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 650                       | 17.8                  | 591                                | 17.6         | 57                                                 | 24.1         | 2                         | 4.1          |
| Middle                                                                                                                                                                                    | 1,973                     | 54.1                  | 1,824                              | 54.2         | 123                                                | 51.9         | 26                        | 53.1         |
| Upper                                                                                                                                                                                     | 1,026                     | 28.1                  | 948                                | 28.2         | 57                                                 | 24.1         | 21                        | 42.9         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,649</b>              | <b>100.0</b>          | <b>3,363</b>                       | <b>100.0</b> | <b>237</b>                                         | <b>100.0</b> | <b>49</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>92.2</b>  |                                                    | <b>6.5</b>   |                           | <b>1.3</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           |                           |                       | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 2                         | 0.6                   | 2                                  | 0.6          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 201                       | 62.8                  | 196                                | 63.0         | 4                                                  | 50.0         | 1                         | 100.0        |
| Upper                                                                                                                                                                                     | 117                       | 36.6                  | 113                                | 36.3         | 4                                                  | 50.0         | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>320</b>                | <b>100.0</b>          | <b>311</b>                         | <b>100.0</b> | <b>8</b>                                           | <b>100.0</b> | <b>1</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>97.2</b>  |                                                    | <b>2.5</b>   |                           | <b>0.3</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table E3**

| 2020 Combined Demographics<br>Assessment Area: Lenawee County Nonmetropolitan                                                                                                             |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 4,132                     | 16.4         |
| Moderate                                                                                                                                                                                  | 4                         | 17.4                  | 3,035                              | 12.1         | 793                                                | 26.1         | 4,368                     | 17.4         |
| Middle                                                                                                                                                                                    | 13                        | 56.5                  | 13,842                             | 55.1         | 1,186                                              | 8.6          | 5,202                     | 20.7         |
| Upper                                                                                                                                                                                     | 6                         | 26.1                  | 8,257                              | 32.9         | 438                                                | 5.3          | 11,432                    | 45.5         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>23</b>                 | <b>100.0</b>          | <b>25,134</b>                      | <b>100.0</b> | <b>2,417</b>                                       | <b>9.6</b>   | <b>25,134</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 6,694                     | 2,963                 | 10.2                               | 44.3         | 2,935                                              | 43.8         | 796                       | 11.9         |
| Middle                                                                                                                                                                                    | 24,176                    | 16,447                | 56.4                               | 68.0         | 4,005                                              | 16.6         | 3,724                     | 15.4         |
| Upper                                                                                                                                                                                     | 12,542                    | 9,770                 | 33.5                               | 77.9         | 1,844                                              | 14.7         | 928                       | 7.4          |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>43,412</b>             | <b>29,180</b>         | <b>100.0</b>                       | <b>67.2</b>  | <b>8,784</b>                                       | <b>20.2</b>  | <b>5,448</b>              | <b>12.5</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 653                       | 17.6                  | 591                                | 17.3         | 60                                                 | 23.6         | 2                         | 4.1          |
| Middle                                                                                                                                                                                    | 1,999                     | 53.9                  | 1,842                              | 54.0         | 132                                                | 52.0         | 25                        | 51.0         |
| Upper                                                                                                                                                                                     | 1,059                     | 28.5                  | 975                                | 28.6         | 62                                                 | 24.4         | 22                        | 44.9         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,711</b>              | <b>100.0</b>          | <b>3,408</b>                       | <b>100.0</b> | <b>254</b>                                         | <b>100.0</b> | <b>49</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>91.8</b>  |                                                    | <b>6.8</b>   |                           | <b>1.3</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 2                         | 0.6                   | 2                                  | 0.6          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 204                       | 62.2                  | 200                                | 62.7         | 3                                                  | 42.9         | 1                         | 50.0         |
| Upper                                                                                                                                                                                     | 122                       | 37.2                  | 117                                | 36.7         | 4                                                  | 57.1         | 1                         | 50.0         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>328</b>                | <b>100.0</b>          | <b>319</b>                         | <b>100.0</b> | <b>7</b>                                           | <b>100.0</b> | <b>2</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>97.3</b>  |                                                    | <b>2.1</b>   |                           | <b>0.6</b>   |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

Table E4A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lenawee County Nonmetropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                       | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                     | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                     | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                     | #                                | #%    | #%    | \$(000) | %     | \$%   | #    | #%    | #%    | \$(000) | %     | \$%   |                              |
| Home Purchase Loans                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                            | 1                                | 50.0  | 13.2  | 104     | 16.1  | 7.5   | 0    | 0.0   | 17.6  | 0       | 0.0   | 12.2  | 14.6                         |
| Middle                                                                                                                              | 1                                | 50.0  | 50.8  | 540     | 83.9  | 52.9  | 0    | 0.0   | 52.4  | 0       | 0.0   | 52.7  | 53.5                         |
| Upper                                                                                                                               | 0                                | 0.0   | 36.0  | 0       | 0.0   | 39.6  | 0    | 0.0   | 30.0  | 0       | 0.0   | 35.1  | 31.9                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                               | 2                                | 100.0 | 100.0 | 644     | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                            | 0                                | 0.0   | 5.1   | 0       | 0.0   | 2.8   | 0    | 0.0   | 13.1  | 0       | 0.0   | 9.6   | 14.6                         |
| Middle                                                                                                                              | 4                                | 36.4  | 53.3  | 482     | 33.8  | 53.0  | 5    | 55.6  | 53.6  | 519     | 57.4  | 50.7  | 53.5                         |
| Upper                                                                                                                               | 7                                | 63.6  | 41.6  | 944     | 66.2  | 44.2  | 4    | 44.4  | 33.3  | 385     | 42.6  | 39.7  | 31.9                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                               | 11                               | 100.0 | 100.0 | 1,426   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 904     | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                            | 0                                | 0.0   | 5.0   | 0       | 0.0   | 4.2   | 0    | 0.0   | 8.7   | 0       | 0.0   | 7.6   | 14.6                         |
| Middle                                                                                                                              | 1                                | 50.0  | 47.8  | 50      | 37.3  | 48.4  | 0    | 0.0   | 59.3  | 0       | 0.0   | 50.5  | 53.5                         |
| Upper                                                                                                                               | 1                                | 50.0  | 47.2  | 84      | 62.7  | 47.4  | 3    | 100.0 | 32.0  | 548     | 100.0 | 41.9  | 31.9                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                               | 2                                | 100.0 | 100.0 | 134     | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 548     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                                                                            | 0                                | 0.0   | 25.0  | 0       | 0.0   | 11.9  | 0    | 0.0   | 16.7  | 0       | 0.0   | 0.5   | 52.3                         |
| Middle                                                                                                                              | 0                                | 0.0   | 37.5  | 0       | 0.0   | 51.7  | 0    | 0.0   | 83.3  | 0       | 0.0   | 99.5  | 43.2                         |
| Upper                                                                                                                               | 0                                | 0.0   | 37.5  | 0       | 0.0   | 36.4  | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 4.5                          |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                               | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                 | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                                                                            | 1                                | 5.3   | 8.2   | 104     | 3.9   | 4.9   | 0    | 0.0   | 15.2  | 0       | 0.0   | 9.4   | 14.6                         |
| Middle                                                                                                                              | 9                                | 47.4  | 52.0  | 1,472   | 55.5  | 52.8  | 7    | 50.0  | 53.6  | 932     | 50.0  | 60.4  | 53.5                         |
| Upper                                                                                                                               | 9                                | 47.4  | 39.8  | 1,078   | 40.6  | 42.3  | 7    | 50.0  | 31.2  | 933     | 50.0  | 30.1  | 31.9                         |
| Unknown                                                                                                                             | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                               | 19                               | 100.0 | 100.0 | 2,654   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,865   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |



Table E4B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lenawee County Nonmetropolitan                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                                               | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 2.0   | 0       | 0.0   | 1.4   | 0    | 0.0   | 13.0  | 0       | 0.0   | 9.5   | 14.6                         |
| Middle                                                                                                                                                      | 3                                | 75.0  | 50.0  | 400     | 88.9  | 53.6  | 2    | 100.0 | 57.4  | 413     | 100.0 | 57.7  | 53.5                         |
| Upper                                                                                                                                                       | 1                                | 25.0  | 48.0  | 50      | 11.1  | 45.1  | 0    | 0.0   | 29.6  | 0       | 0.0   | 32.8  | 31.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 4                                | 100.0 | 100.0 | 450     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 413     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 9.5   | 0       | 0.0   | 3.6   | 0    | 0.0   | 16.2  | 0       | 0.0   | 15.2  | 14.6                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 47.6  | 0       | 0.0   | 45.4  | 0    | 0.0   | 48.6  | 0       | 0.0   | 56.5  | 53.5                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 42.9  | 0       | 0.0   | 51.0  | 0    | 0.0   | 35.1  | 0       | 0.0   | 28.3  | 31.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 10.3  | 0       | 0.0   | 5.7   | 0    | 0.0   | 17.9  | 0       | 0.0   | 16.5  | 14.6                         |
| Middle                                                                                                                                                      | 0                                | 0.0   | 55.2  | 0       | 0.0   | 53.0  | 0    | 0.0   | 53.6  | 0       | 0.0   | 47.8  | 53.5                         |
| Upper                                                                                                                                                       | 0                                | 0.0   | 34.5  | 0       | 0.0   | 41.3  | 0    | 0.0   | 28.6  | 0       | 0.0   | 35.8  | 31.9                         |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                                                   | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table E5A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lenawee County Nonmetropolitan |                          |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                            | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                                                                        |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                   | 1                        | 100.0 | 11.1  | 61      | 100.0 | 5.9   | 10.2                         |
| Middle                                                                                                                     | 0                        | 0.0   | 52.5  | 0       | 0.0   | 54.2  | 56.4                         |
| Upper                                                                                                                      | 0                        | 0.0   | 36.3  | 0       | 0.0   | 39.9  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                      | 1                        | 100.0 | 100.0 | 61      | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                            |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                   | 0                        | 0.0   | 4.6   | 0       | 0.0   | 2.4   | 10.2                         |
| Middle                                                                                                                     | 1                        | 16.7  | 53.2  | 120     | 16.8  | 52.8  | 56.4                         |
| Upper                                                                                                                      | 5                        | 83.3  | 42.2  | 593     | 83.2  | 44.8  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                      | 6                        | 100.0 | 100.0 | 713     | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                     |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                   | 0                        | 0.0   | 4.1   | 0       | 0.0   | 3.1   | 10.2                         |
| Middle                                                                                                                     | 2                        | 50.0  | 56.2  | 71      | 26.2  | 60.5  | 56.4                         |
| Upper                                                                                                                      | 2                        | 50.0  | 39.7  | 200     | 73.8  | 36.4  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                      | 4                        | 100.0 | 100.0 | 271     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                          |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                                                                   | 0                        | 0.0   | 30.0  | 0       | 0.0   | 29.0  | 44.5                         |
| Middle                                                                                                                     | 0                        | 0.0   | 50.0  | 0       | 0.0   | 24.9  | 39.5                         |
| Upper                                                                                                                      | 0                        | 0.0   | 20.0  | 0       | 0.0   | 46.1  | 16.0                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                      | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                  |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                                                                   | 1                        | 5.6   | 7.0   | 61      | 3.8   | 4.3   | 10.2                         |
| Middle                                                                                                                     | 9                        | 50.0  | 53.0  | 709     | 43.6  | 52.9  | 56.4                         |
| Upper                                                                                                                      | 8                        | 44.4  | 40.0  | 855     | 52.6  | 42.7  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                      | 18                       | 100.0 | 100.0 | 1,625   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                             |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                    |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                             |                          |       |       |         |       |       |                              |

Table E5B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Lenawee County Nonmetropolitan |                          |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                            | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                            | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                                                              |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                   | 0                        | 0.0   | 2.3   | 0       | 0.0   | 3.3   | 10.2                         |
| Middle                                                                                                                     | 6                        | 85.7  | 47.1  | 518     | 89.3  | 49.1  | 56.4                         |
| Upper                                                                                                                      | 1                        | 14.3  | 50.6  | 62      | 10.7  | 47.6  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                      | 7                        | 100.0 | 100.0 | 580     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 10.2                         |
| Middle                                                                                                                     | 0                        | 0.0   | 63.9  | 0       | 0.0   | 69.8  | 56.4                         |
| Upper                                                                                                                      | 0                        | 0.0   | 36.1  | 0       | 0.0   | 30.2  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                      | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                     |                          |       |       |         |       |       |                              |
| Low                                                                                                                        | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                   | 0                        | 0.0   | 4.3   | 0       | 0.0   | 3.3   | 10.2                         |
| Middle                                                                                                                     | 0                        | 0.0   | 52.2  | 0       | 0.0   | 49.0  | 56.4                         |
| Upper                                                                                                                      | 0                        | 0.0   | 43.5  | 0       | 0.0   | 47.6  | 33.5                         |
| Unknown                                                                                                                    | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                      | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                             |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                    |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                             |                          |       |       |         |       |       |                              |

**Table E6**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|----------|-------|-------|------|-------|-------|----------|-------|-------|--------------------------|
| Assessment Area: Lenawee County Nonmetropolitan                                    |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |          |       |       |      |       |       |          |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |          |       |       | 2022 |       |       |          |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank     |       | Agg   | Bank |       | Agg   | Bank     |       | Agg   |                          |
|                                                                                    | #                                | %     | %     | \$ (000) | %     | %     | #    | %     | %     | \$ (000) | %     | %     |                          |
| By Revenue                                                                         |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
| \$1 Million or Less                                                                | 5                                | 27.8  | 50.2  | 227      | 6.2   | 33.5  | 6    | 40.0  | 59.6  | 1,571    | 43.0  | 52.0  | 92.3                     |
| Over \$1 Million                                                                   | 11                               | 61.1  |       | 3,379    | 92.7  |       | 9    | 60.0  |       | 2,085    | 57.0  |       | 6.3                      |
| Revenue Unknown                                                                    | 2                                | 11.1  |       | 41       | 1.1   |       | 0    | 0.0   |       | 0        | 0.0   |       | 1.4                      |
| Total                                                                              | 18                               | 100.0 |       | 3,647    | 100.0 |       | 15   | 100.0 |       | 3,656    | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
| \$100,000 or Less                                                                  | 10                               | 55.6  | 92.6  | 504      | 13.8  | 42.1  | 5    | 33.3  | 94.8  | 320      | 8.8   | 44.4  |                          |
| \$100,001 - \$250,000                                                              | 3                                | 16.7  | 4.7   | 577      | 15.8  | 22.0  | 6    | 40.0  | 3.3   | 1,136    | 31.1  | 21.4  |                          |
| \$250,001 - \$1 Million                                                            | 5                                | 27.8  | 2.7   | 2,566    | 70.4  | 35.9  | 4    | 26.7  | 1.9   | 2,200    | 60.2  | 34.2  |                          |
| Total                                                                              | 18                               | 100.0 | 100.0 | 3,647    | 100.0 | 100.0 | 15   | 100.0 | 100.0 | 3,656    | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
| \$100,000 or Less                                                                  | 5                                | 100.0 |       | 227      | 100.0 |       | 2    | 33.3  |       | 85       | 5.4   |       |                          |
| \$100,001 - \$250,000                                                              | 0                                | 0.0   |       | 0        | 0.0   |       | 3    | 50.0  |       | 486      | 30.9  |       |                          |
| \$250,001 - \$1 Million                                                            | 0                                | 0.0   |       | 0        | 0.0   |       | 1    | 16.7  |       | 1,000    | 63.7  |       |                          |
| Total                                                                              | 5                                | 100.0 |       | 227      | 100.0 |       | 6    | 100.0 |       | 1,571    | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |          |       |       |      |       |       |          |       |       |                          |

**Table E7**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses |                          |       |       |         |       |       |                          |
|---------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lenawee County Nonmetropolitan                           |                          |       |       |         |       |       |                          |
|                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                           | #                        | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                       | 8                        | 42.1  | 31.4  | 428     | 13.4  | 22.8  | 91.8                     |
| Over \$1 Million                                                          | 10                       | 52.6  |       | 2,763   | 86.3  |       | 6.8                      |
| Revenue Unknown                                                           | 1                        | 5.3   |       | 11      | 0.3   |       | 1.3                      |
| Total                                                                     | 19                       | 100.0 |       | 3,202   | 100.0 |       | 100.0                    |
| By Loan Size                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 10                       | 52.6  | 89.6  | 457     | 14.3  | 36.1  |                          |
| \$100,001 - \$250,000                                                     | 5                        | 26.3  | 6.3   | 779     | 24.3  | 20.7  |                          |
| \$250,001 - \$1 Million                                                   | 4                        | 21.1  | 4.1   | 1,966   | 61.4  | 43.2  |                          |
| Total                                                                     | 19                       | 100.0 | 100.0 | 3,202   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                         | 6                        | 75.0  |       | 187     | 43.7  |       |                          |
| \$100,001 - \$250,000                                                     | 2                        | 25.0  |       | 241     | 56.3  |       |                          |
| \$250,001 - \$1 Million                                                   | 0                        | 0.0   |       | 0       | 0.0   |       |                          |
| Total                                                                     | 8                        | 100.0 |       | 428     | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data                                            |                          |       |       |         |       |       |                          |
| 2020 Dun & Bradstreet Data                                                |                          |       |       |         |       |       |                          |
| 2011-2015 U.S. Census Bureau: American Community Survey                   |                          |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.            |                          |       |       |         |       |       |                          |

Table E8A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lenawee County Nonmetropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|---------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                 | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                 | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                 | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Home Purchase Loans                                                                                                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 0                                | 0.0   | 7.3   | 0       | 0.0   | 3.7   | 0    | 0.0   | 5.4   | 0       | 0.0   | 2.7   | 15.7                              |
| Moderate                                                                                                                        | 0                                | 0.0   | 21.5  | 0       | 0.0   | 15.4  | 0    | 0.0   | 20.0  | 0       | 0.0   | 13.4  | 19.0                              |
| Middle                                                                                                                          | 1                                | 50.0  | 22.9  | 104     | 16.1  | 21.4  | 0    | 0.0   | 23.6  | 0       | 0.0   | 21.2  | 21.6                              |
| Upper                                                                                                                           | 1                                | 50.0  | 32.7  | 540     | 83.9  | 44.4  | 0    | 0.0   | 32.6  | 0       | 0.0   | 45.6  | 43.8                              |
| Unknown                                                                                                                         | 0                                | 0.0   | 15.6  | 0       | 0.0   | 15.1  | 0    | 0.0   | 18.4  | 0       | 0.0   | 17.1  | 0.0                               |
| Total                                                                                                                           | 2                                | 100.0 | 100.0 | 644     | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 0                                | 0.0   | 4.4   | 0       | 0.0   | 2.3   | 0    | 0.0   | 9.4   | 0       | 0.0   | 5.8   | 15.7                              |
| Moderate                                                                                                                        | 1                                | 9.1   | 16.0  | 100     | 7.0   | 11.3  | 4    | 44.4  | 22.3  | 275     | 30.4  | 16.8  | 19.0                              |
| Middle                                                                                                                          | 4                                | 36.4  | 23.4  | 307     | 21.5  | 20.4  | 3    | 33.3  | 25.9  | 479     | 53.0  | 23.4  | 21.6                              |
| Upper                                                                                                                           | 4                                | 36.4  | 40.0  | 727     | 51.0  | 48.3  | 2    | 22.2  | 33.3  | 150     | 16.6  | 39.9  | 43.8                              |
| Unknown                                                                                                                         | 2                                | 18.2  | 16.3  | 292     | 20.5  | 17.8  | 0    | 0.0   | 9.1   | 0       | 0.0   | 14.0  | 0.0                               |
| Total                                                                                                                           | 11                               | 100.0 | 100.0 | 1,426   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 904     | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 0                                | 0.0   | 4.4   | 0       | 0.0   | 3.5   | 0    | 0.0   | 6.9   | 0       | 0.0   | 4.6   | 15.7                              |
| Moderate                                                                                                                        | 0                                | 0.0   | 15.6  | 0       | 0.0   | 14.2  | 0    | 0.0   | 21.6  | 0       | 0.0   | 15.5  | 19.0                              |
| Middle                                                                                                                          | 0                                | 0.0   | 19.4  | 0       | 0.0   | 18.5  | 1    | 33.3  | 22.9  | 77      | 14.1  | 18.8  | 21.6                              |
| Upper                                                                                                                           | 2                                | 100.0 | 58.3  | 134     | 100.0 | 62.1  | 1    | 33.3  | 44.6  | 383     | 69.9  | 51.5  | 43.8                              |
| Unknown                                                                                                                         | 0                                | 0.0   | 2.2   | 0       | 0.0   | 1.7   | 1    | 33.3  | 3.9   | 88      | 16.1  | 9.6   | 0.0                               |
| Total                                                                                                                           | 2                                | 100.0 | 100.0 | 134     | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 548     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                             | 1                                | 5.3   | 5.5   | 50      | 1.9   | 2.9   | 0    | 0.0   | 7.1   | 0       | 0.0   | 3.7   | 15.7                              |
| Moderate                                                                                                                        | 2                                | 10.5  | 18.1  | 200     | 7.5   | 13.1  | 4    | 28.6  | 20.7  | 275     | 14.7  | 14.4  | 19.0                              |
| Middle                                                                                                                          | 6                                | 31.6  | 22.9  | 511     | 19.3  | 20.7  | 4    | 28.6  | 24.4  | 556     | 29.8  | 21.7  | 21.6                              |
| Upper                                                                                                                           | 8                                | 42.1  | 37.8  | 1,601   | 60.3  | 46.9  | 5    | 35.7  | 33.8  | 946     | 50.7  | 44.2  | 43.8                              |
| Unknown                                                                                                                         | 2                                | 10.5  | 15.6  | 292     | 11.0  | 16.4  | 1    | 7.1   | 14.1  | 88      | 4.7   | 16.0  | 0.0                               |
| Total                                                                                                                           | 19                               | 100.0 | 100.0 | 2,654   | 100.0 | 100.0 | 14   | 100.0 | 100.0 | 1,865   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table E8B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lenawee County Nonmetropolitan                             |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                                                                                                             | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 1                                | 25.0  | 7.8   | 50      | 11.1  | 3.2   | 0    | 0.0   | 11.3  | 0       | 0.0   | 6.2   | 15.7                              |
| Moderate                                                                                                                                                    | 1                                | 25.0  | 21.6  | 100     | 22.2  | 17.7  | 0    | 0.0   | 18.3  | 0       | 0.0   | 15.8  | 19.0                              |
| Middle                                                                                                                                                      | 1                                | 25.0  | 20.6  | 100     | 22.2  | 17.0  | 0    | 0.0   | 30.4  | 0       | 0.0   | 27.4  | 21.6                              |
| Upper                                                                                                                                                       | 1                                | 25.0  | 46.1  | 200     | 44.4  | 60.6  | 2    | 100.0 | 38.3  | 413     | 100.0 | 49.6  | 43.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 3.9   | 0       | 0.0   | 1.5   | 0    | 0.0   | 1.7   | 0       | 0.0   | 0.9   | 0.0                               |
| Total                                                                                                                                                       | 4                                | 100.0 | 100.0 | 450     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 413     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 7.1   | 0       | 0.0   | 4.1   | 0    | 0.0   | 8.1   | 0       | 0.0   | 5.6   | 15.7                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 19.0  | 0       | 0.0   | 10.0  | 0    | 0.0   | 18.9  | 0       | 0.0   | 8.6   | 19.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 31.0  | 0       | 0.0   | 21.2  | 0    | 0.0   | 24.3  | 0       | 0.0   | 14.9  | 21.6                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 38.1  | 0       | 0.0   | 62.5  | 0    | 0.0   | 45.9  | 0       | 0.0   | 69.5  | 43.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 4.8   | 0       | 0.0   | 2.3   | 0    | 0.0   | 2.7   | 0       | 0.0   | 1.5   | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 15.7                              |
| Moderate                                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.0                              |
| Middle                                                                                                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 21.6                              |
| Upper                                                                                                                                                       | 0                                | 0.0   | 3.4   | 0       | 0.0   | 5.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 43.8                              |
| Unknown                                                                                                                                                     | 0                                | 0.0   | 96.6  | 0       | 0.0   | 94.4  | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0.0                               |
| Total                                                                                                                                                       | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table E9A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lenawee County Nonmetropolitan |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                            | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                        | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                        | #                        | #%    | #%    | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                    |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                        | 0.0   | 6.5   | 0       | 0.0   | 3.6   | 16.4                              |
| Moderate                                                                                                               | 0                        | 0.0   | 22.1  | 0       | 0.0   | 15.6  | 17.4                              |
| Middle                                                                                                                 | 0                        | 0.0   | 25.7  | 0       | 0.0   | 23.9  | 20.7                              |
| Upper                                                                                                                  | 1                        | 100.0 | 33.4  | 61      | 100.0 | 44.8  | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 12.3  | 0       | 0.0   | 12.1  | 0.0                               |
| Total                                                                                                                  | 1                        | 100.0 | 100.0 | 61      | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                        |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 1                        | 16.7  | 3.1   | 80      | 11.2  | 1.5   | 16.4                              |
| Moderate                                                                                                               | 1                        | 16.7  | 11.3  | 90      | 12.6  | 7.3   | 17.4                              |
| Middle                                                                                                                 | 1                        | 16.7  | 19.5  | 120     | 16.8  | 16.3  | 20.7                              |
| Upper                                                                                                                  | 3                        | 50.0  | 40.3  | 423     | 59.3  | 49.0  | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 25.8  | 0       | 0.0   | 25.9  | 0.0                               |
| Total                                                                                                                  | 6                        | 100.0 | 100.0 | 713     | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                        | 0.0   | 9.1   | 0       | 0.0   | 7.8   | 16.4                              |
| Moderate                                                                                                               | 0                        | 0.0   | 15.7  | 0       | 0.0   | 11.9  | 17.4                              |
| Middle                                                                                                                 | 1                        | 25.0  | 22.3  | 50      | 18.5  | 18.1  | 20.7                              |
| Upper                                                                                                                  | 3                        | 75.0  | 52.1  | 221     | 81.5  | 60.1  | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 0.8   | 0       | 0.0   | 2.1   | 0.0                               |
| Total                                                                                                                  | 4                        | 100.0 | 100.0 | 271     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                              |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 1                        | 5.6   | 4.6   | 80      | 4.9   | 2.4   | 16.4                              |
| Moderate                                                                                                               | 3                        | 16.7  | 15.3  | 255     | 15.7  | 10.7  | 17.4                              |
| Middle                                                                                                                 | 4                        | 22.2  | 21.7  | 320     | 19.7  | 19.2  | 20.7                              |
| Upper                                                                                                                  | 10                       | 55.6  | 37.6  | 970     | 59.7  | 47.0  | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 20.8  | 0       | 0.0   | 20.7  | 0.0                               |
| Total                                                                                                                  | 18                       | 100.0 | 100.0 | 1,625   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                         |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                         |                          |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.                                              |                          |       |       |         |       |       |                                   |

**Table E9B**

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Lenawee County Nonmetropolitan |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                            | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                        | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                        | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                        | 0.0   | 2.3   | 0       | 0.0   | 1.2   | 16.4                              |
| Moderate                                                                                                               | 2                        | 28.6  | 10.3  | 165     | 28.4  | 6.5   | 17.4                              |
| Middle                                                                                                                 | 2                        | 28.6  | 21.8  | 150     | 25.9  | 16.1  | 20.7                              |
| Upper                                                                                                                  | 3                        | 42.9  | 62.1  | 265     | 45.7  | 73.1  | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 3.4   | 0       | 0.0   | 3.0   | 0.0                               |
| Total                                                                                                                  | 7                        | 100.0 | 100.0 | 580     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                            |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                        | 0.0   | 5.6   | 0       | 0.0   | 2.6   | 16.4                              |
| Moderate                                                                                                               | 0                        | 0.0   | 11.1  | 0       | 0.0   | 11.1  | 17.4                              |
| Middle                                                                                                                 | 0                        | 0.0   | 30.6  | 0       | 0.0   | 24.6  | 20.7                              |
| Upper                                                                                                                  | 0                        | 0.0   | 44.4  | 0       | 0.0   | 54.5  | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 8.3   | 0       | 0.0   | 7.2   | 0.0                               |
| Total                                                                                                                  | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                    | 0                        | 0.0   | 1.1   | 0       | 0.0   | 0.3   | 16.4                              |
| Moderate                                                                                                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.4                              |
| Middle                                                                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 20.7                              |
| Upper                                                                                                                  | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 45.5                              |
| Unknown                                                                                                                | 0                        | 0.0   | 98.9  | 0       | 0.0   | 99.7  | 0.0                               |
| Total                                                                                                                  | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data                                                                                         |                          |       |       |         |       |       |                                   |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                |                          |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.                                                         |                          |       |       |         |       |       |                                   |



**Table E10**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lenawee County Nonmetropolitan                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                                                         | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                         | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                                                         | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                         | #                                | #%    | #%    | \$(000) | %     | %     | #    | #%    | #%    | \$(000) | %     | %     |                          |
| By Revenue                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                     | 5                                | 27.8  | 50.2  | 227     | 6.2   | 33.5  | 6    | 40.0  | 59.6  | 1,571   | 43.0  | 52.0  | 92.3                     |
| Over \$1 Million                                                                                                        | 11                               | 61.1  |       | 3,379   | 92.7  |       | 9    | 60.0  |       | 2,085   | 57.0  |       | 6.3                      |
| Revenue Unknown                                                                                                         | 2                                | 11.1  |       | 41      | 1.1   |       | 0    | 0.0   |       | 0       | 0.0   |       | 1.4                      |
| Total                                                                                                                   | 18                               | 100.0 |       | 3,647   | 100.0 |       | 15   | 100.0 |       | 3,656   | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 10                               | 55.6  | 92.6  | 504     | 13.8  | 42.1  | 5    | 33.3  | 94.8  | 320     | 8.8   | 44.4  |                          |
| \$100,001 - \$250,000                                                                                                   | 3                                | 16.7  | 4.7   | 577     | 15.8  | 22.0  | 6    | 40.0  | 3.3   | 1,136   | 31.1  | 21.4  |                          |
| \$250,001 - \$1 Million                                                                                                 | 5                                | 27.8  | 2.7   | 2,566   | 70.4  | 35.9  | 4    | 26.7  | 1.9   | 2,200   | 60.2  | 34.2  |                          |
| Total                                                                                                                   | 18                               | 100.0 | 100.0 | 3,647   | 100.0 | 100.0 | 15   | 100.0 | 100.0 | 3,656   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                       | 5                                | 100.0 |       | 227     | 100.0 |       | 2    | 33.3  |       | 85      | 5.4   |       |                          |
| \$100,001 - \$250,000                                                                                                   | 0                                | 0.0   |       | 0       | 0.0   |       | 3    | 50.0  |       | 486     | 30.9  |       |                          |
| \$250,001 - \$1 Million                                                                                                 | 0                                | 0.0   |       | 0       | 0.0   |       | 1    | 16.7  |       | 1,000   | 63.7  |       |                          |
| Total                                                                                                                   | 5                                | 100.0 |       | 227     | 100.0 |       | 6    | 100.0 |       | 1,571   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table E11**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses<br>Assessment Area: Lenawee County Nonmetropolitan                                                              |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
|                                                                                                                                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | ##    | ##    | \$(000) | %     | %     |                          |
| By Revenue                                                                                                                                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                                                                                       | 8                        | 42.1  | 31.4  | 428     | 13.4  | 22.8  | 91.8                     |
| Over \$1 Million                                                                                                                                                                          | 10                       | 52.6  |       | 2,763   | 86.3  |       | 6.8                      |
| Revenue Unknown                                                                                                                                                                           | 1                        | 5.3   |       | 11      | 0.3   |       | 1.3                      |
| Total                                                                                                                                                                                     | 19                       | 100.0 |       | 3,202   | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                                                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 10                       | 52.6  | 89.6  | 457     | 14.3  | 36.1  |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 5                        | 26.3  | 6.3   | 779     | 24.3  | 20.7  |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 4                        | 21.1  | 4.1   | 1,966   | 61.4  | 43.2  |                          |
| Total                                                                                                                                                                                     | 19                       | 100.0 | 100.0 | 3,202   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 6                        | 75.0  |       | 187     | 43.7  |       |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 2                        | 25.0  |       | 241     | 56.3  |       |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 0                        | 0.0   |       | 0       | 0.0   |       |                          |
| Total                                                                                                                                                                                     | 8                        | 100.0 |       | 428     | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table E12

| 2022 Combined Demographics                                                                                                                                                                |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                                                                                                                                        |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                                                                                                                                                         | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 2,595                     | 17.6         |
| Moderate                                                                                                                                                                                  | 2                         | 14.3                  | 1,825                              | 12.4         | 457                                                | 25.0         | 2,620                     | 17.8         |
| Middle                                                                                                                                                                                    | 6                         | 42.9                  | 5,997                              | 40.8         | 545                                                | 9.1          | 2,789                     | 19.0         |
| Upper                                                                                                                                                                                     | 6                         | 42.9                  | 6,890                              | 46.8         | 296                                                | 4.3          | 6,708                     | 45.6         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>14</b>                 | <b>100.0</b>          | <b>14,712</b>                      | <b>100.0</b> | <b>1,298</b>                                       | <b>8.8</b>   | <b>14,712</b>             | <b>100.0</b> |
|                                                                                                                                                                                           | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                                                                                           |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                                                                                       | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 3,146                     | 1,358                 | 9.3                                | 43.2         | 1,651                                              | 52.5         | 137                       | 4.4          |
| Middle                                                                                                                                                                                    | 10,100                    | 5,788                 | 39.8                               | 57.3         | 3,041                                              | 30.1         | 1,271                     | 12.6         |
| Upper                                                                                                                                                                                     | 11,550                    | 7,415                 | 50.9                               | 64.2         | 2,025                                              | 17.5         | 2,110                     | 18.3         |
| Unknown                                                                                                                                                                                   | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>24,796</b>             | <b>14,561</b>         | <b>100.0</b>                       | <b>58.7</b>  | <b>6,717</b>                                       | <b>27.1</b>  | <b>3,518</b>              | <b>14.2</b>  |
|                                                                                                                                                                                           | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or =                     |              | Over \$1 Million                                   |              | Revenue Not               |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 532                       | 17.6                  | 489                                | 17.3         | 35                                                 | 21.7         | 8                         | 20.5         |
| Middle                                                                                                                                                                                    | 1,148                     | 38.0                  | 1,061                              | 37.6         | 72                                                 | 44.7         | 15                        | 38.5         |
| Upper                                                                                                                                                                                     | 1,342                     | 44.4                  | 1,272                              | 45.1         | 54                                                 | 33.5         | 16                        | 41.0         |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>3,022</b>              | <b>100.0</b>          | <b>2,822</b>                       | <b>100.0</b> | <b>161</b>                                         | <b>100.0</b> | <b>39</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                                                                                    |                           |                       |                                    | <b>93.4</b>  |                                                    | <b>5.3</b>   |                           | <b>1.3</b>   |
|                                                                                                                                                                                           | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                                                                                           |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                                                                                           | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                                                                                       | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                                                                                  | 7                         | 6.0                   | 7                                  | 6.1          | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                                                                                    | 32                        | 27.6                  | 32                                 | 27.8         | 0                                                  | 0.0          | 0                         | 0.0          |
| Upper                                                                                                                                                                                     | 77                        | 66.4                  | 76                                 | 66.1         | 1                                                  | 100.0        | 0                         | 0.0          |
| Unknown                                                                                                                                                                                   | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                                                                                           | <b>116</b>                | <b>100.0</b>          | <b>115</b>                         | <b>100.0</b> | <b>1</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                                                                                         |                           |                       |                                    | <b>99.1</b>  |                                                    | <b>0.9</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                       |                                    |              |                                                    |              |                           |              |

**Table E13**

| 2021 Combined Demographics                                                                                              |                           |                       |                                    |              |                                                    |              |                           |              |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|--------------|----------------------------------------------------|--------------|---------------------------|--------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                                                                      |                           |                       |                                    |              |                                                    |              |                           |              |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 2,592                     | 19.7         |
| Moderate                                                                                                                | 3                         | 30.0                  | 4,197                              | 32.0         | 830                                                | 19.8         | 2,369                     | 18.0         |
| Middle                                                                                                                  | 4                         | 40.0                  | 4,556                              | 34.7         | 658                                                | 14.4         | 2,335                     | 17.8         |
| Upper                                                                                                                   | 3                         | 30.0                  | 4,377                              | 33.3         | 178                                                | 4.1          | 5,834                     | 44.4         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>10</b>                 | <b>100.0</b>          | <b>13,130</b>                      | <b>100.0</b> | <b>1,666</b>                                       | <b>12.7</b>  | <b>13,130</b>             | <b>100.0</b> |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |              |                                                    |              |                           |              |
|                                                                                                                         |                           | Owner-occupied        |                                    |              | Rental                                             |              | Vacant                    |              |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit    | #                                                  | % by unit    | #                         | % by unit    |
| Low                                                                                                                     | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 7,668                     | 3,679                 | 26.0                               | 48.0         | 3,009                                              | 39.2         | 980                       | 12.8         |
| Middle                                                                                                                  | 8,027                     | 5,063                 | 35.8                               | 63.1         | 1,707                                              | 21.3         | 1,257                     | 15.7         |
| Upper                                                                                                                   | 8,282                     | 5,408                 | 38.2                               | 65.3         | 1,450                                              | 17.5         | 1,424                     | 17.2         |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>23,977</b>             | <b>14,150</b>         | <b>100.0</b>                       | <b>59.0</b>  | <b>6,166</b>                                       | <b>25.7</b>  | <b>3,661</b>              | <b>15.3</b>  |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or =                     |              | Over \$1 Million                                   |              | Revenue Not               |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 1,050                     | 33.6                  | 978                                | 33.5         | 58                                                 | 34.9         | 14                        | 36.8         |
| Middle                                                                                                                  | 1,150                     | 36.8                  | 1,078                              | 36.9         | 59                                                 | 35.5         | 13                        | 34.2         |
| Upper                                                                                                                   | 927                       | 29.6                  | 867                                | 29.7         | 49                                                 | 29.5         | 11                        | 28.9         |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>3,127</b>              | <b>100.0</b>          | <b>2,923</b>                       | <b>100.0</b> | <b>166</b>                                         | <b>100.0</b> | <b>38</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>                                                                                  |                           |                       |                                    | <b>93.5</b>  |                                                    | <b>5.3</b>   |                           | <b>1.2</b>   |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |              |                                                    |              |                           |              |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|                                                                                                                         | #                         | %                     | #                                  | %            | #                                                  | %            | #                         | %            |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| Moderate                                                                                                                | 20                        | 16.8                  | 20                                 | 16.9         | 0                                                  | 0.0          | 0                         | 0.0          |
| Middle                                                                                                                  | 42                        | 35.3                  | 42                                 | 35.6         | 0                                                  | 0.0          | 0                         | 0.0          |
| Upper                                                                                                                   | 57                        | 47.9                  | 56                                 | 47.5         | 1                                                  | 100.0        | 0                         | 0.0          |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0          | 0                                                  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>                                                                                                         | <b>119</b>                | <b>100.0</b>          | <b>118</b>                         | <b>100.0</b> | <b>1</b>                                           | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>                                                                                       |                           |                       |                                    | <b>99.2</b>  |                                                    | <b>0.8</b>   |                           | <b>0.0</b>   |
| Source: 2021 FFIEC Census Data<br>2021 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |              |                                                    |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |              |                                                    |              |                           |              |

Table E14

| 2020 Combined Demographics                                                                                              |                           |                       |                                    |           |                                                    |           |                           |           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------|------------------------------------|-----------|----------------------------------------------------|-----------|---------------------------|-----------|
| Assessment Area: Bank of the Hills Nonmetropolitan                                                                      |                           |                       |                                    |           |                                                    |           |                           |           |
| Income Categories                                                                                                       | Tract Distribution        |                       | Families by Tract Income           |           | Families < Poverty Level as % of Families by Tract |           | Families by Family Income |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 2,592                     | 19.7      |
| Moderate                                                                                                                | 3                         | 30.0                  | 4,197                              | 32.0      | 830                                                | 19.8      | 2,369                     | 18.0      |
| Middle                                                                                                                  | 4                         | 40.0                  | 4,556                              | 34.7      | 658                                                | 14.4      | 2,335                     | 17.8      |
| Upper                                                                                                                   | 3                         | 30.0                  | 4,377                              | 33.3      | 178                                                | 4.1       | 5,834                     | 44.4      |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 10                        | 100.0                 | 13,130                             | 100.0     | 1,666                                              | 12.7      | 13,130                    | 100.0     |
|                                                                                                                         | Housing Units by Tract    | Housing Type by Tract |                                    |           |                                                    |           |                           |           |
|                                                                                                                         |                           | Owner-occupied        |                                    |           | Rental                                             |           | Vacant                    |           |
|                                                                                                                         |                           | #                     | % by tract                         | % by unit | #                                                  | % by unit | #                         | % by unit |
| Low                                                                                                                     | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 7,668                     | 3,679                 | 26.0                               | 48.0      | 3,009                                              | 39.2      | 980                       | 12.8      |
| Middle                                                                                                                  | 8,027                     | 5,063                 | 35.8                               | 63.1      | 1,707                                              | 21.3      | 1,257                     | 15.7      |
| Upper                                                                                                                   | 8,282                     | 5,408                 | 38.2                               | 65.3      | 1,450                                              | 17.5      | 1,424                     | 17.2      |
| Unknown                                                                                                                 | 0                         | 0                     | 0.0                                | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 23,977                    | 14,150                | 100.0                              | 59.0      | 6,166                                              | 25.7      | 3,661                     | 15.3      |
|                                                                                                                         | Total Businesses by Tract |                       | Businesses by Tract & Revenue Size |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or =                     |           | Over \$1 Million                                   |           | Revenue Not               |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 1,061                     | 33.7                  | 991                                | 33.7      | 61                                                 | 34.7      | 9                         | 32.1      |
| Middle                                                                                                                  | 1,150                     | 36.6                  | 1,077                              | 36.6      | 64                                                 | 36.4      | 9                         | 32.1      |
| Upper                                                                                                                   | 933                       | 29.7                  | 872                                | 29.7      | 51                                                 | 29.0      | 10                        | 35.7      |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 3,144                     | 100.0                 | 2,940                              | 100.0     | 176                                                | 100.0     | 28                        | 100.0     |
| Percentage of Total Businesses:                                                                                         |                           |                       |                                    | 93.5      |                                                    | 5.6       |                           | 0.9       |
|                                                                                                                         | Total Farms by Tract      |                       | Farms by Tract & Revenue Size      |           |                                                    |           |                           |           |
|                                                                                                                         |                           |                       | Less Than or = \$1 Million         |           | Over \$1 Million                                   |           | Revenue Not Reported      |           |
|                                                                                                                         | #                         | %                     | #                                  | %         | #                                                  | %         | #                         | %         |
| Low                                                                                                                     | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Moderate                                                                                                                | 23                        | 18.3                  | 23                                 | 18.4      | 0                                                  | 0.0       | 0                         | 0.0       |
| Middle                                                                                                                  | 46                        | 36.5                  | 46                                 | 36.8      | 0                                                  | 0.0       | 0                         | 0.0       |
| Upper                                                                                                                   | 57                        | 45.2                  | 56                                 | 44.8      | 1                                                  | 100.0     | 0                         | 0.0       |
| Unknown                                                                                                                 | 0                         | 0.0                   | 0                                  | 0.0       | 0                                                  | 0.0       | 0                         | 0.0       |
| Total AA                                                                                                                | 126                       | 100.0                 | 125                                | 100.0     | 1                                                  | 100.0     | 0                         | 0.0       |
| Percentage of Total Farms:                                                                                              |                           |                       |                                    | 99.2      |                                                    | 0.8       |                           | 0.0       |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey |                           |                       |                                    |           |                                                    |           |                           |           |
| Note: Percentages may not total 100.0 percent due to rounding.                                                          |                           |                       |                                    |           |                                                    |           |                           |           |

Table E15A

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Bank of the Hills Nonmetropolitan |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                          | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                                        | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                                                                        | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                                        | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Home Purchase Loans                                                                                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                               | 0                                | 0.0   | 29.8  | 0       | 0.0   | 23.9  | 0    | 0.0   | 9.2   | 0       | 0.0   | 8.5   | 9.3                          |
| Middle                                                                                                                                 | 0                                | 0.0   | 29.3  | 0       | 0.0   | 30.8  | 2    | 100.0 | 40.7  | 975     | 100.0 | 36.4  | 39.8                         |
| Upper                                                                                                                                  | 1                                | 100.0 | 40.9  | 350     | 100.0 | 45.3  | 0    | 0.0   | 50.1  | 0       | 0.0   | 55.2  | 50.9                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                  | 1                                | 100.0 | 100.0 | 350     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 975     | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                                                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                               | 3                                | 23.1  | 23.1  | 443     | 25.9  | 20.2  | 0    | 0.0   | 6.3   | 0       | 0.0   | 4.4   | 9.3                          |
| Middle                                                                                                                                 | 2                                | 15.4  | 35.5  | 395     | 23.1  | 37.6  | 2    | 22.2  | 42.5  | 230     | 13.0  | 39.0  | 39.8                         |
| Upper                                                                                                                                  | 8                                | 61.5  | 41.4  | 874     | 51.1  | 42.2  | 7    | 77.8  | 51.2  | 1,545   | 87.0  | 56.6  | 50.9                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                  | 13                               | 100.0 | 100.0 | 1,712   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 1,775   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                                                                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                               | 2                                | 22.2  | 21.7  | 130     | 12.9  | 5.9   | 1    | 11.1  | 4.0   | 324     | 21.2  | 4.5   | 9.3                          |
| Middle                                                                                                                                 | 4                                | 44.4  | 47.8  | 676     | 67.1  | 42.7  | 2    | 22.2  | 32.0  | 150     | 9.8   | 30.2  | 39.8                         |
| Upper                                                                                                                                  | 3                                | 33.3  | 30.4  | 202     | 20.0  | 51.4  | 6    | 66.7  | 64.0  | 1,051   | 68.9  | 65.3  | 50.9                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                  | 9                                | 100.0 | 100.0 | 1,008   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 1,525   | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                                                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                                                                               | 0                                | 0.0   | 50.0  | 0       | 0.0   | 61.0  | 0    | 0.0   | 33.3  | 0       | 0.0   | 61.7  | 41.6                         |
| Middle                                                                                                                                 | 0                                | 0.0   | 50.0  | 0       | 0.0   | 39.0  | 0    | 0.0   | 16.7  | 0       | 0.0   | 7.1   | 34.6                         |
| Upper                                                                                                                                  | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 50.0  | 0       | 0.0   | 31.2  | 23.9                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                  | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                                                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                                                                                    | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                                                                               | 9                                | 31.0  | 26.7  | 1,220   | 31.1  | 23.2  | 1    | 4.0   | 8.1   | 324     | 6.2   | 10.8  | 9.3                          |
| Middle                                                                                                                                 | 7                                | 24.1  | 32.4  | 1,193   | 30.4  | 34.0  | 6    | 24.0  | 40.9  | 1,355   | 26.1  | 35.1  | 39.8                         |
| Upper                                                                                                                                  | 13                               | 44.8  | 40.9  | 1,506   | 38.4  | 42.8  | 18   | 72.0  | 51.0  | 3,513   | 67.7  | 54.1  | 50.9                         |
| Unknown                                                                                                                                | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                                                                                  | 29                               | 100.0 | 100.0 | 3,919   | 100.0 | 100.0 | 25   | 100.0 | 100.0 | 5,192   | 100.0 | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                                                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table E15B

| Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
|----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                  | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                              |
|                                                                                  | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                  | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |
| Other Purpose Lines of Credit                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                         | 4                                | 66.7  | 0.0   | 647     | 76.2  | 0.0   | 0    | 0.0   | 16.7  | 0       | 0.0   | 10.1  | 9.3                          |
| Middle                                                                           | 1                                | 16.7  | 25.0  | 122     | 14.4  | 24.2  | 0    | 0.0   | 50.0  | 0       | 0.0   | 20.8  | 39.8                         |
| Upper                                                                            | 1                                | 16.7  | 75.0  | 80      | 9.4   | 75.8  | 5    | 100.0 | 33.3  | 917     | 100.0 | 69.1  | 50.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                            | 6                                | 100.0 | 100.0 | 849     | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 917     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                         | 0                                | 0.0   | 20.0  | 0       | 0.0   | 10.3  | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 9.3                          |
| Middle                                                                           | 0                                | 0.0   | 33.3  | 0       | 0.0   | 41.9  | 0    | 0.0   | 35.3  | 0       | 0.0   | 40.8  | 39.8                         |
| Upper                                                                            | 0                                | 0.0   | 46.7  | 0       | 0.0   | 47.8  | 0    | 0.0   | 64.7  | 0       | 0.0   | 59.2  | 50.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Low                                                                              | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                         | 0                                | 0.0   | 60.9  | 0       | 0.0   | 63.4  | 0    | 0.0   | 9.5   | 0       | 0.0   | 8.1   | 9.3                          |
| Middle                                                                           | 0                                | 0.0   | 17.4  | 0       | 0.0   | 16.6  | 0    | 0.0   | 52.4  | 0       | 0.0   | 45.8  | 39.8                         |
| Upper                                                                            | 0                                | 0.0   | 21.7  | 0       | 0.0   | 20.0  | 0    | 0.0   | 38.1  | 0       | 0.0   | 46.1  | 50.9                         |
| Unknown                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                        | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                            | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2022 FFIEC Census Data                                                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| 2016-2020 U.S. Census Bureau: American Community Survey                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                   |                                  |       |       |         |       |       |      |       |       |         |       |       |                              |

Table E16A

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                      |                          |       |       |         |       |       |                              |
| Geographic<br>Income<br>Level                                           | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                         | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                         | #                        | #%    | #%    | \$(000) | %     | %     |                              |
| Home Purchase Loans                                                     |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                | 1                        | 20.0  | 28.3  | 110     | 8.7   | 24.4  | 26.0                         |
| Middle                                                                  | 2                        | 40.0  | 28.2  | 579     | 45.6  | 28.9  | 35.8                         |
| Upper                                                                   | 2                        | 40.0  | 43.5  | 582     | 45.8  | 46.6  | 38.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 5                        | 100.0 | 100.0 | 1,271   | 100.0 | 100.0 | 100.0                        |
| Refinance Loans                                                         |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                | 2                        | 25.0  | 23.2  | 252     | 24.8  | 19.1  | 26.0                         |
| Middle                                                                  | 3                        | 37.5  | 32.8  | 487     | 47.9  | 34.9  | 35.8                         |
| Upper                                                                   | 3                        | 37.5  | 44.0  | 277     | 27.3  | 46.0  | 38.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 8                        | 100.0 | 100.0 | 1,016   | 100.0 | 100.0 | 100.0                        |
| Home Improvement Loans                                                  |                          |       |       |         |       |       |                              |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                | 1                        | 25.0  | 24.2  | 250     | 60.2  | 16.0  | 26.0                         |
| Middle                                                                  | 2                        | 50.0  | 33.3  | 115     | 27.7  | 44.6  | 35.8                         |
| Upper                                                                   | 1                        | 25.0  | 42.4  | 50      | 12.0  | 39.4  | 38.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 4                        | 100.0 | 100.0 | 415     | 100.0 | 100.0 | 100.0                        |
| Multifamily Loans                                                       |                          |       |       |         |       |       | Multi-family<br>Units %      |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 55.1                         |
| Middle                                                                  | 0                        | 0.0   | 75.0  | 0       | 0.0   | 67.2  | 35.8                         |
| Upper                                                                   | 0                        | 0.0   | 25.0  | 0       | 0.0   | 32.8  | 9.1                          |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Total Home Mortgage Loans                                               |                          |       |       |         |       |       | Owner<br>Occupied<br>Units % |
| Low                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Moderate                                                                | 5                        | 20.8  | 26.5  | 642     | 18.8  | 21.5  | 26.0                         |
| Middle                                                                  | 7                        | 29.2  | 30.5  | 1,181   | 34.7  | 32.8  | 35.8                         |
| Upper                                                                   | 12                       | 50.0  | 43.0  | 1,584   | 46.5  | 45.7  | 38.2                         |
| Unknown                                                                 | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Total                                                                   | 24                       | 100.0 | 100.0 | 3,407   | 100.0 | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                          |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                 |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.          |                          |       |       |         |       |       |                              |

Table E16B

| Distribution of 2020 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Bank of the Hills Nonmetropolitan |                          |       |       |         |       |       |                              |
|-------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Geographic<br>Income<br>Level                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Owner<br>Occupied<br>Units % |
|                                                                                                                               | Bank                     |       | Agg   | Bank    |       | Agg   |                              |
|                                                                                                                               | #                        | %     | %     | \$(000) | %     | %     |                              |
| Other Purpose Lines of Credit                                                                                                 |                          |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                      | 1                        | 14.3  | 33.3  | 30      | 4.3   | 15.6  | 26.0                         |
| Middle                                                                                                                        | 0                        | 0.0   | 16.7  | 0       | 0.0   | 23.9  | 35.8                         |
| Upper                                                                                                                         | 6                        | 85.7  | 50.0  | 675     | 95.7  | 60.5  | 38.2                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                         | 7                        | 100.0 | 100.0 | 705     | 100.0 | 100.0 | 100.0                        |
| Other Purpose Closed/Exempt                                                                                                   |                          |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                      | 0                        | 0.0   | 40.0  | 0       | 0.0   | 23.0  | 26.0                         |
| Middle                                                                                                                        | 0                        | 0.0   | 20.0  | 0       | 0.0   | 14.8  | 35.8                         |
| Upper                                                                                                                         | 0                        | 0.0   | 40.0  | 0       | 0.0   | 62.2  | 38.2                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                         | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Purpose Not Applicable                                                                                                        |                          |       |       |         |       |       |                              |
| Low                                                                                                                           | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Moderate                                                                                                                      | 0                        | 0.0   | 51.0  | 0       | 0.0   | 23.5  | 26.0                         |
| Middle                                                                                                                        | 0                        | 0.0   | 28.6  | 0       | 0.0   | 51.1  | 35.8                         |
| Upper                                                                                                                         | 0                        | 0.0   | 20.4  | 0       | 0.0   | 25.3  | 38.2                         |
| Unknown                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                          |
| Tract-Unk                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                              |
| Total                                                                                                                         | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |
| Source: 2020 FFIEC Census Data                                                                                                |                          |       |       |         |       |       |                              |
| 2011-2015 U.S. Census Bureau: American Community Survey                                                                       |                          |       |       |         |       |       |                              |
| Note: Percentages may not total 100.0 percent due to rounding.                                                                |                          |       |       |         |       |       |                              |



**Table E17**

| Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|-----------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Geographic<br>Income<br>Level                                                     | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                   | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                   | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                   | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| Low                                                                               | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Moderate                                                                          | 6                                | 42.9  | 29.6  | 1,002   | 70.5  | 31.1  | 4    | 30.8  | 15.8  | 565     | 27.9  | 20.1  | 17.6                     |
| Middle                                                                            | 4                                | 28.6  | 37.0  | 181     | 12.7  | 40.7  | 4    | 30.8  | 39.7  | 731     | 36.1  | 39.3  | 38.0                     |
| Upper                                                                             | 4                                | 28.6  | 30.7  | 239     | 16.8  | 27.8  | 5    | 38.5  | 42.9  | 731     | 36.1  | 40.2  | 44.4                     |
| Unknown                                                                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                             | 14                               | 100.0 | 100.0 | 1,422   | 100.0 | 100.0 | 13   | 100.0 | 100.0 | 2,027   | 100.0 | 100.0 | 100.0                    |
| Source: 2022 FFIEC Census Data                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                        |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table E18**

Table 2-10

| Distribution of 2020 Small Business Lending by Income Level of Geography<br>Assessment Area: Bank of the Hills Nonmetropolitan                                                            |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic<br>Income<br>Level                                                                                                                                                             | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | %     | %     | \$(000) | %     | %     |                          |
| Low                                                                                                                                                                                       | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Moderate                                                                                                                                                                                  | 14                       | 35.0  | 31.2  | 701     | 22.4  | 27.5  | 33.7                     |
| Middle                                                                                                                                                                                    | 11                       | 27.5  | 36.2  | 1,675   | 53.5  | 34.7  | 36.6                     |
| Upper                                                                                                                                                                                     | 15                       | 37.5  | 30.0  | 756     | 24.1  | 34.2  | 29.7                     |
| Unknown                                                                                                                                                                                   | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |
| Total                                                                                                                                                                                     | 40                       | 100.0 | 100.0 | 3,132   | 100.0 | 100.0 | 100.0                    |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

Table E19A

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | %     | %     | \$(000) | %     | %     | #    | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                          |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 2.0   | 0       | 0.0   | 0.8   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.2   | 17.6                              |
| Moderate                                                                     | 0                                | 0.0   | 7.7   | 0       | 0.0   | 4.3   | 0    | 0.0   | 8.8   | 0       | 0.0   | 4.3   | 17.8                              |
| Middle                                                                       | 0                                | 0.0   | 19.4  | 0       | 0.0   | 14.4  | 1    | 50.0  | 17.2  | 100     | 10.3  | 12.4  | 19.0                              |
| Upper                                                                        | 1                                | 100.0 | 51.9  | 350     | 100.0 | 62.5  | 1    | 50.0  | 52.9  | 875     | 89.7  | 63.5  | 45.6                              |
| Unknown                                                                      | 0                                | 0.0   | 19.0  | 0       | 0.0   | 17.9  | 0    | 0.0   | 20.3  | 0       | 0.0   | 19.6  | 0.0                               |
| Total                                                                        | 1                                | 100.0 | 100.0 | 350     | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 975     | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                              |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 1.9   | 0       | 0.0   | 0.9   | 0    | 0.0   | 3.3   | 0       | 0.0   | 1.7   | 17.6                              |
| Moderate                                                                     | 4                                | 30.8  | 8.6   | 471     | 27.5  | 5.1   | 2    | 22.2  | 15.9  | 230     | 13.0  | 10.0  | 17.8                              |
| Middle                                                                       | 1                                | 7.7   | 15.9  | 147     | 8.6   | 11.3  | 1    | 11.1  | 14.2  | 150     | 8.5   | 10.0  | 19.0                              |
| Upper                                                                        | 7                                | 53.8  | 46.3  | 1,000   | 58.4  | 54.1  | 5    | 55.6  | 48.8  | 905     | 51.0  | 60.5  | 45.6                              |
| Unknown                                                                      | 1                                | 7.7   | 27.2  | 94      | 5.5   | 28.6  | 1    | 11.1  | 17.8  | 490     | 27.6  | 17.7  | 0.0                               |
| Total                                                                        | 13                               | 100.0 | 100.0 | 1,712   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 1,775   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 1                                | 11.1  | 13.0  | 20      | 2.0   | 5.1   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.6                              |
| Moderate                                                                     | 3                                | 33.3  | 13.0  | 217     | 21.5  | 6.5   | 1    | 11.1  | 8.0   | 137     | 9.0   | 5.4   | 17.8                              |
| Middle                                                                       | 3                                | 33.3  | 21.7  | 371     | 36.8  | 19.7  | 3    | 33.3  | 22.0  | 424     | 27.8  | 17.9  | 19.0                              |
| Upper                                                                        | 2                                | 22.2  | 47.8  | 400     | 39.7  | 65.4  | 4    | 44.4  | 70.0  | 864     | 56.7  | 76.7  | 45.6                              |
| Unknown                                                                      | 0                                | 0.0   | 4.3   | 0       | 0.0   | 3.3   | 1    | 11.1  | 0.0   | 100     | 6.6   | 0.0   | 0.0                               |
| Total                                                                        | 9                                | 100.0 | 100.0 | 1,008   | 100.0 | 100.0 | 9    | 100.0 | 100.0 | 1,525   | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 1                                | 3.4   | 2.1   | 20      | 0.5   | 0.9   | 0    | 0.0   | 1.5   | 0       | 0.0   | 0.6   | 17.6                              |
| Moderate                                                                     | 9                                | 31.0  | 8.2   | 931     | 23.8  | 4.7   | 4    | 16.0  | 10.8  | 467     | 9.0   | 5.9   | 17.8                              |
| Middle                                                                       | 5                                | 17.2  | 17.7  | 640     | 16.3  | 13.0  | 7    | 28.0  | 16.3  | 1,091   | 21.0  | 11.8  | 19.0                              |
| Upper                                                                        | 13                               | 44.8  | 49.0  | 2,234   | 57.0  | 58.7  | 12   | 48.0  | 52.1  | 3,044   | 58.6  | 62.7  | 45.6                              |
| Unknown                                                                      | 1                                | 3.4   | 23.0  | 94      | 2.4   | 22.7  | 2    | 8.0   | 19.2  | 590     | 11.4  | 19.0  | 0.0                               |
| Total                                                                        | 29                               | 100.0 | 100.0 | 3,919   | 100.0 | 100.0 | 25   | 100.0 | 100.0 | 5,192   | 100.0 | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Multifamily loans are not included in the borrower distribution analysis.    |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table E19B

| Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                           |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Borrower<br>Income<br>Level                                                  | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                              | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                                   |
|                                                                              | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                              | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                                   |
| Other Purpose Lines of Credit                                                |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 12.5  | 0       | 0.0   | 17.6  | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.6                              |
| Moderate                                                                     | 2                                | 33.3  | 0.0   | 243     | 28.6  | 0.0   | 1    | 20.0  | 16.7  | 100     | 10.9  | 39.5  | 17.8                              |
| Middle                                                                       | 1                                | 16.7  | 50.0  | 122     | 14.4  | 50.2  | 2    | 40.0  | 16.7  | 417     | 45.5  | 10.1  | 19.0                              |
| Upper                                                                        | 3                                | 50.0  | 25.0  | 484     | 57.0  | 29.3  | 2    | 40.0  | 66.7  | 400     | 43.6  | 50.4  | 45.6                              |
| Unknown                                                                      | 0                                | 0.0   | 12.5  | 0       | 0.0   | 3.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                               |
| Total                                                                        | 6                                | 100.0 | 100.0 | 849     | 100.0 | 100.0 | 5    | 100.0 | 100.0 | 917     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                  |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.6                              |
| Moderate                                                                     | 0                                | 0.0   | 13.3  | 0       | 0.0   | 8.1   | 0    | 0.0   | 5.9   | 0       | 0.0   | 3.8   | 17.8                              |
| Middle                                                                       | 0                                | 0.0   | 13.3  | 0       | 0.0   | 8.6   | 0    | 0.0   | 11.8  | 0       | 0.0   | 7.3   | 19.0                              |
| Upper                                                                        | 0                                | 0.0   | 73.3  | 0       | 0.0   | 83.3  | 0    | 0.0   | 82.4  | 0       | 0.0   | 88.9  | 45.6                              |
| Unknown                                                                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Low                                                                          | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.6                              |
| Moderate                                                                     | 0                                | 0.0   | 4.3   | 0       | 0.0   | 2.2   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.8                              |
| Middle                                                                       | 0                                | 0.0   | 13.0  | 0       | 0.0   | 13.2  | 0    | 0.0   | 14.3  | 0       | 0.0   | 9.9   | 19.0                              |
| Upper                                                                        | 0                                | 0.0   | 39.1  | 0       | 0.0   | 36.6  | 0    | 0.0   | 14.3  | 0       | 0.0   | 9.9   | 45.6                              |
| Unknown                                                                      | 0                                | 0.0   | 43.5  | 0       | 0.0   | 48.0  | 0    | 0.0   | 71.4  | 0       | 0.0   | 80.2  | 0.0                               |
| Total                                                                        | 0                                | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2022 FFIEC Census Data                                               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| 2016-2020 U.S. Census Bureau: American Community Survey                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |
| Note: Percentages may not total 100.0 percent due to rounding.               |                                  |       |       |         |       |       |      |       |       |         |       |       |                                   |

Table E20A

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Bank of the Hills Nonmetropolitan                                                                                                                |                          |       |       |         |       |       |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                                                                                              | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                                                                                                          | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                                                                                                          | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Home Purchase Loans                                                                                                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 1.9   | 0       | 0.0   | 0.8   | 19.7                              |
| Moderate                                                                                                                                                                                                                                 | 0                        | 0.0   | 10.7  | 0       | 0.0   | 6.2   | 18.0                              |
| Middle                                                                                                                                                                                                                                   | 0                        | 0.0   | 22.3  | 0       | 0.0   | 16.1  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 3                        | 60.0  | 56.4  | 961     | 75.6  | 68.5  | 44.4                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 40.0  | 8.8   | 310     | 24.4  | 8.4   | 0.0                               |
| Total                                                                                                                                                                                                                                    | 5                        | 100.0 | 100.0 | 1,271   | 100.0 | 100.0 | 100.0                             |
| Refinance Loans                                                                                                                                                                                                                          |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 2.3   | 0       | 0.0   | 1.5   | 19.7                              |
| Moderate                                                                                                                                                                                                                                 | 1                        | 12.5  | 6.3   | 87      | 8.6   | 3.7   | 18.0                              |
| Middle                                                                                                                                                                                                                                   | 2                        | 25.0  | 15.3  | 362     | 35.6  | 10.8  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 3                        | 37.5  | 49.2  | 427     | 42.0  | 56.2  | 44.4                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 25.0  | 26.9  | 140     | 13.8  | 27.8  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 8                        | 100.0 | 100.0 | 1,016   | 100.0 | 100.0 | 100.0                             |
| Home Improvement Loans                                                                                                                                                                                                                   |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 9.1   | 0       | 0.0   | 3.3   | 19.7                              |
| Moderate                                                                                                                                                                                                                                 | 2                        | 50.0  | 9.1   | 115     | 27.7  | 5.0   | 18.0                              |
| Middle                                                                                                                                                                                                                                   | 0                        | 0.0   | 9.1   | 0       | 0.0   | 4.1   | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 0                        | 0.0   | 63.6  | 0       | 0.0   | 64.0  | 44.4                              |
| Unknown                                                                                                                                                                                                                                  | 2                        | 50.0  | 9.1   | 300     | 72.3  | 23.6  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 4                        | 100.0 | 100.0 | 415     | 100.0 | 100.0 | 100.0                             |
| Total Home Mortgage Loans                                                                                                                                                                                                                |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                                                                                                      | 0                        | 0.0   | 2.1   | 0       | 0.0   | 1.1   | 19.7                              |
| Moderate                                                                                                                                                                                                                                 | 4                        | 16.7  | 8.4   | 287     | 8.4   | 4.9   | 18.0                              |
| Middle                                                                                                                                                                                                                                   | 6                        | 25.0  | 18.1  | 727     | 21.3  | 13.1  | 17.8                              |
| Upper                                                                                                                                                                                                                                    | 8                        | 33.3  | 52.3  | 1,643   | 48.2  | 61.7  | 44.4                              |
| Unknown                                                                                                                                                                                                                                  | 6                        | 25.0  | 19.1  | 750     | 22.0  | 19.2  | 0.0                               |
| Total                                                                                                                                                                                                                                    | 24                       | 100.0 | 100.0 | 3,407   | 100.0 | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                          |       |       |         |       |       |                                   |

Table E20B

| Distribution of 2020 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Bank of the Hills Nonmetropolitan                                   |                          |       |       |         |       |       |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower<br>Income<br>Level                                                                                                                                 | Bank and Aggregate Loans |       |       |         |       |       | Families by<br>Family<br>Income % |
|                                                                                                                                                             | Bank                     |       | Agg   | Bank    |       | Agg   |                                   |
|                                                                                                                                                             | #                        | %     | %     | \$(000) | %     | %     |                                   |
| Other Purpose Lines of Credit                                                                                                                               |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.7                              |
| Moderate                                                                                                                                                    | 1                        | 14.3  | 0.0   | 85      | 12.1  | 0.0   | 18.0                              |
| Middle                                                                                                                                                      | 4                        | 57.1  | 33.3  | 365     | 51.8  | 13.1  | 17.8                              |
| Upper                                                                                                                                                       | 2                        | 28.6  | 66.7  | 255     | 36.2  | 86.9  | 44.4                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                               |
| Total                                                                                                                                                       | 7                        | 100.0 | 100.0 | 705     | 100.0 | 100.0 | 100.0                             |
| Other Purpose Closed/Exempt                                                                                                                                 |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 20.0  | 0       | 0.0   | 7.8   | 18.0                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 17.8                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 80.0  | 0       | 0.0   | 92.2  | 44.4                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Purpose Not Applicable                                                                                                                                      |                          |       |       |         |       |       |                                   |
| Low                                                                                                                                                         | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 19.7                              |
| Moderate                                                                                                                                                    | 0                        | 0.0   | 2.0   | 0       | 0.0   | 1.1   | 18.0                              |
| Middle                                                                                                                                                      | 0                        | 0.0   | 2.0   | 0       | 0.0   | 0.4   | 17.8                              |
| Upper                                                                                                                                                       | 0                        | 0.0   | 20.4  | 0       | 0.0   | 15.4  | 44.4                              |
| Unknown                                                                                                                                                     | 0                        | 0.0   | 75.5  | 0       | 0.0   | 83.1  | 0.0                               |
| Total                                                                                                                                                       | 0                        | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                             |
| Source: 2020 FFIEC Census Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                                   |

**Table E21**

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|------------------------------------------------------------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Bank of the Hills Nonmetropolitan                                 |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
|                                                                                    | Bank and Aggregate Loans by Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                    | 2021                             |       |       |         |       |       | 2022 |       |       |         |       |       |                          |
|                                                                                    | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                    | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$1 Million or Less                                                                | 8                                | 57.1  | 46.4  | 663     | 46.6  | 35.4  | 6    | 46.2  | 53.2  | 1,016   | 50.1  | 37.7  | 93.4                     |
| Over \$1 Million                                                                   | 3                                | 21.4  |       | 676     | 47.5  |       | 5    | 38.5  |       | 845     | 41.7  |       | 5.3                      |
| Revenue Unknown                                                                    | 3                                | 21.4  |       | 83      | 5.8   |       | 2    | 15.4  |       | 166     | 8.2   |       | 1.3                      |
| Total                                                                              | 14                               | 100.0 |       | 1,422   | 100.0 |       | 13   | 100.0 |       | 2,027   | 100.0 |       | 100.0                    |
| By Loan Size                                                                       |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 11                               | 78.6  | 90.1  | 564     | 39.7  | 33.5  | 6    | 46.2  | 89.2  | 371     | 18.3  | 27.3  |                          |
| \$100,001 - \$250,000                                                              | 2                                | 14.3  | 5.3   | 458     | 32.2  | 17.9  | 4    | 30.8  | 5.7   | 725     | 35.8  | 19.7  |                          |
| \$250,001 - \$1 Million                                                            | 1                                | 7.1   | 4.6   | 400     | 28.1  | 48.6  | 3    | 23.1  | 5.1   | 931     | 45.9  | 53.0  |                          |
| Total                                                                              | 14                               | 100.0 | 100.0 | 1,422   | 100.0 | 100.0 | 13   | 100.0 | 100.0 | 2,027   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                      |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| \$100,000 or Less                                                                  | 7                                | 87.5  |       | 431     | 65.0  |       | 2    | 33.3  |       | 130     | 12.8  |       |                          |
| \$100,001 - \$250,000                                                              | 1                                | 12.5  |       | 232     | 35.0  |       | 2    | 33.3  |       | 355     | 34.9  |       |                          |
| \$250,001 - \$1 Million                                                            | 0                                | 0.0   |       | 0       | 0.0   |       | 2    | 33.3  |       | 531     | 52.3  |       |                          |
| Total                                                                              | 8                                | 100.0 |       | 663     | 100.0 |       | 6    | 100.0 |       | 1,016   | 100.0 |       |                          |
| Source: 2022 FFIEC Census Data                                                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2022 Dun & Bradstreet Data                                                         |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| 2016-2020 U.S. Census Bureau: American Community Survey                            |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |
| Note: Percentages may not total 100.0 percent due to rounding.                     |                                  |       |       |         |       |       |      |       |       |         |       |       |                          |

**Table E22**

| Distribution of 2020 Small Business Lending by Revenue Size of Businesses<br>Assessment Area: Bank of the Hills Nonmetropolitan                                                           |                          |       |       |         |       |       |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------|-------|---------|-------|-------|--------------------------|
|                                                                                                                                                                                           | Bank and Aggregate Loans |       |       |         |       |       | Total<br>Businesses<br>% |
|                                                                                                                                                                                           | Bank                     |       | Agg   | Bank    |       | Agg   |                          |
|                                                                                                                                                                                           | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                          |
| By Revenue                                                                                                                                                                                |                          |       |       |         |       |       |                          |
| \$1 Million or Less                                                                                                                                                                       | 23                       | 57.5  | 47.5  | 791     | 25.3  | 44.1  | 93.5                     |
| Over \$1 Million                                                                                                                                                                          | 6                        | 15.0  |       | 1,912   | 61.0  |       | 5.6                      |
| Revenue Unknown                                                                                                                                                                           | 11                       | 27.5  |       | 429     | 13.7  |       | 0.9                      |
| Total                                                                                                                                                                                     | 40                       | 100.0 |       | 3,132   | 100.0 |       | 100.0                    |
| By Loan Size                                                                                                                                                                              |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 34                       | 85.0  | 91.4  | 1,171   | 37.4  | 43.8  |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 5                        | 12.5  | 5.2   | 961     | 30.7  | 19.2  |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 1                        | 2.5   | 3.4   | 1,000   | 31.9  | 37.1  |                          |
| Total                                                                                                                                                                                     | 40                       | 100.0 | 100.0 | 3,132   | 100.0 | 100.0 |                          |
| By Loan Size and Revenues \$1 Million or Less                                                                                                                                             |                          |       |       |         |       |       |                          |
| \$100,000 or Less                                                                                                                                                                         | 22                       | 95.7  |       | 646     | 81.7  |       |                          |
| \$100,001 - \$250,000                                                                                                                                                                     | 1                        | 4.3   |       | 145     | 18.3  |       |                          |
| \$250,001 - \$1 Million                                                                                                                                                                   | 0                        | 0.0   |       | 0       | 0.0   |       |                          |
| Total                                                                                                                                                                                     | 23                       | 100.0 |       | 791     | 100.0 |       |                          |
| Source: 2020 FFIEC Census Data<br>2020 Dun & Bradstreet Data<br>2011-2015 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                          |       |       |         |       |       |                          |

## GLOSSARY

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Census tract:** A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** All Agencies have adopted the following language:

1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less.
4. Activities that revitalize or stabilize –
  - a. Low- or moderate-income geographies.
  - b. Designated disaster areas.
  - c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
    - i. Rates of poverty, unemployment, and population loss.
    - ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

**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 do 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 income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

**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.

**Low-income:** Individual income that is 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 metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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.

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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



**Rated area:** A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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.

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

**Public Exhibit 8**

**List of Comerica Bank and Comerica Bank & Trust Main Offices, Branches**

## **Branches of Comerica Bank**

### **Current Comerica Bank Branches**

| <b>Name</b>                 | <b>Address</b>              | <b>City</b>      | <b>State</b> | <b>ZIP Code</b> | <b>Service Type</b> | <b>LMI Census Tract</b> |
|-----------------------------|-----------------------------|------------------|--------------|-----------------|---------------------|-------------------------|
| Orchestra Place             | 3663 Woodward Ave Suite 140 | Detroit          | MI           | 48201           | Brick & Mortar      |                         |
| Woodward-Margaret           | 18222 Woodward Ave          | Detroit          | MI           | 48203           | Brick & Mortar      |                         |
| Mound-Eight Mile            | 20555 Mound Rd              | Detroit          | MI           | 48234           | Brick & Mortar      |                         |
| Penobscot Building          | 645 Griswold, Suite 70      | Detroit          | MI           | 48226           | Brick & Mortar      |                         |
| W. Grand Blvd.-3rd          | 2911 W. Grand Blvd          | Detroit          | MI           | 48202           | Brick & Mortar      |                         |
| Woodward-Hamilton           | 188 N. Old Woodward Ave     | Birmingham       | MI           | 48009           | Brick & Mortar      |                         |
| Woodward-Fourteen Mile      | 33101 Woodward Ave          | Birmingham       | MI           | 48009           | Brick & Mortar      |                         |
| Ann Arbor-Merriman          | 31200 Ann Arbor Trail       | Westland         | MI           | 48185           | Brick & Mortar      |                         |
| Joy-Beech Daly              | 25851 Joy Rd                | Dearborn Hgts.   | MI           | 48127           | Brick & Mortar      |                         |
| Greenfield-Ten Mile         | 25192 Greenfield            | Oak Park         | MI           | 48237           | Brick & Mortar      | X                       |
| Schoolcraft-Inkster         | 27367 Schoolcraft           | Redford          | MI           | 48239           | Brick & Mortar      |                         |
| Wayne-Warren                | 6870 N. Wayne Rd            | Westland         | MI           | 48185           | Brick & Mortar      |                         |
| Twelve Mile-Orchard Lake    | 31500 Twelve Mile Rd        | Farmington Hills | MI           | 48334           | Brick & Mortar      |                         |
| Jefferson-Chene             | 2631 E. Jefferson           | Detroit          | MI           | 48207           | Brick & Mortar      | X                       |
| Fourteen Mile-Dequindre     | 1915 E. Fourteen Mile Rd    | Sterling Hgts.   | MI           | 48310           | Brick & Mortar      | X                       |
| Garfield-Metropolitan Pkwy. | 36965 Garfield              | Clinton Twp      | MI           | 48035           | Brick & Mortar      | X                       |
| Ann Arbor-Lilley            | 42345 Ann Arbor Rd          | Plymouth         | MI           | 48170           | Brick & Mortar      |                         |
| McNichols-Meyers            | 16933 Meyers                | Detroit          | MI           | 48235           | Brick & Mortar      | X                       |

| Name                              | Address                   | City            | State | ZIP Code | Service Type   | LMI Census Tract |
|-----------------------------------|---------------------------|-----------------|-------|----------|----------------|------------------|
| Maple-Orchard Lake                | 5680 W. Maple             | W. Bloomfield   | MI    | 48322    | Brick & Mortar |                  |
| Groesbeck-Twelve Mile             | 28801 Groesbeck Hwy       | Roseville       | MI    | 48066    | Brick & Mortar |                  |
| Eureka-Pardee                     | 14700 Pardee              | Taylor          | MI    | 48180    | Brick & Mortar |                  |
| Jefferson-Shook                   | 35320 Jefferson           | Harrison Twp    | MI    | 48045    | Brick & Mortar |                  |
| Rochester-Avon                    | 923 S. Rochester Rd       | Rochester Hills | MI    | 48307    | Brick & Mortar |                  |
| Fourteen Mile-Farmington          | 33140 W. Fourteen Mile Rd | W. Bloomfield   | MI    | 48322    | Brick & Mortar |                  |
| Fifteen Mile-Schoenherr           | 13655 Fifteen Mile Rd     | Sterling Hgts.  | MI    | 48312    | Brick & Mortar |                  |
| Kelly-Ten Mile                    | 25300 Kelly Rd            | Roseville       | MI    | 48066    | Brick & Mortar | X                |
| Groesbeck-Harrington              | 39010 Groesbeck Hwy       | Clinton Twp     | MI    | 48036    | Brick & Mortar |                  |
| Michigan-Central                  | 7720 Michigan Ave         | Detroit         | MI    | 48210    | Brick & Mortar | X                |
| Gratiot-Eight Mile                | 15261 Gratiot Ave.        | Detroit         | MI    | 48205    | Brick & Mortar | X                |
| Grand River-Outer Drive           | 19401 Grand River         | Detroit         | MI    | 48223    | Brick & Mortar |                  |
| Warren-Evergreen                  | 19810 W. Warren           | Detroit         | MI    | 48228    | Brick & Mortar | X                |
| Belleville-I/94                   | 11531 Belleville Rd       | Belleville      | MI    | 48111    | Brick & Mortar |                  |
| Twenty Three Mile-Mound           | 50955 Mound Rd            | Shelby Twp      | MI    | 48317    | Brick & Mortar |                  |
| Eight Mile-Huntington             | 19333 W. Eight Mile Rd.   | Detroit         | MI    | 48219    | Brick & Mortar | X                |
| Ford-Beech Daly                   | 25745 Ford Rd             | Dearborn Hgts.  | MI    | 48127    | Brick & Mortar |                  |
| Garfield-Canal ComeriMART         | 41941 Garfield            | Clinton Twp     | MI    | 48038    | Brick & Mortar |                  |
| E. Grand River-Whitmore Lake      | 5671 Whitmore Lake Rd     | Brighton        | MI    | 48116    | Brick & Mortar |                  |
| Fourteen Mile-Haggerty ComeriMART | 39950 Fourteen Mile Rd    | Walled Lake     | MI    | 48390    | Brick & Mortar |                  |

| Name                                | Address                 | City                   | State | ZIP Code | Service Type   | LMI Census Tract |
|-------------------------------------|-------------------------|------------------------|-------|----------|----------------|------------------|
| Twelve Mile-Dequindre<br>ComeriMART | 28230 Dequindre         | Warren                 | MI    | 48092    | Brick & Mortar |                  |
| Warren-Calhoun                      | 13335 W. Warren         | Dearborn               | MI    | 48126    | Brick & Mortar | X                |
| Mack-Lochmoor                       | 20200 Mack Ave          | Grosse Pointe<br>Woods | MI    | 48236    | Brick & Mortar |                  |
| Michigan-American                   | 16150 Michigan Ave      | Dearborn               | MI    | 48126    | Brick & Mortar |                  |
| Jefferson-Coplin                    | 13233 E. Jefferson      | Detroit                | MI    | 48215    | Brick & Mortar | X                |
| Livernois-Lyndon                    | 14530 Livernois         | Detroit                | MI    | 48238    | Brick & Mortar | X                |
| Melvindale                          | 18225 Allen Rd          | Melvindale             | MI    | 48122    | Brick & Mortar |                  |
| Pleasant Ridge                      | 24028 Woodward Ave      | Pleasant Ridge         | MI    | 48069    | Brick & Mortar |                  |
| Maple-Telegraph                     | 4057 W. Maple           | Bloomfield Hills       | MI    | 48301    | Brick & Mortar |                  |
| Northville                          | 129 E. Main Street      | Northville             | MI    | 48167    | Brick & Mortar |                  |
| Woodward-Hunter                     | 36440 Woodward Ave.     | Bloomfield Hills       | MI    | 48304    | Brick & Mortar |                  |
| Romulus                             | 36450 Goddard Rd        | Romulus                | MI    | 48174    | Brick & Mortar |                  |
| Gratiot-Hillside                    | 35795 Gratiot Ave       | Clinton Twp            | MI    | 48035    | Brick & Mortar | X                |
| Southfield-Edwards                  | 29252 Southfield Rd     | Southfield             | MI    | 48076    | Brick & Mortar | X                |
| Eight Mile-Farmington               | 33452 W. Eight Mile Rd. | Farmington             | MI    | 48335    | Brick & Mortar | X                |
| Telegraph-Lehigh                    | 4401 S. Telegraph       | Dearborn Hgts.         | MI    | 48125    | Brick & Mortar |                  |
| Van Dyke-Utica                      | 43020 Van Dyke          | Sterling Hgts.         | MI    | 48314    | Brick & Mortar | X                |
| Wayne-Canyon                        | 360 S. Wayne Rd         | Westland               | MI    | 48185    | Brick & Mortar |                  |
| Northwestern Hwy                    | 29333 Northwestern Hwy  | Southfield             | MI    | 48034    | Brick & Mortar | X                |
| Sylvan Lake                         | 2340 Orchard Lake       | Sylvan Lake            | MI    | 48320    | Brick & Mortar |                  |
| Fort-14th                           | 2200 W. Fort St.        | Detroit                | MI    | 48216    | Brick & Mortar |                  |
| Crooks-Long Lake                    | 4999 Crooks Rd          | Troy                   | MI    | 48098    | Brick & Mortar |                  |
| Crooks-Maple                        | 1495 Crooks Rd          | Troy                   | MI    | 48084    | Brick & Mortar |                  |

| Name                           | Address                     | City                | State | ZIP Code | Service Type   | LMI Census Tract |
|--------------------------------|-----------------------------|---------------------|-------|----------|----------------|------------------|
| John R-Maple                   | 1494 John R                 | Troy                | MI    | 48083    | Brick & Mortar |                  |
| Walton-Adams                   | 3012 Walton Blvd.           | Rochester Hills     | MI    | 48309    | Brick & Mortar |                  |
| Eighteen Mile-Dequindre        | 1955 Eighteen Mile Rd.      | Sterling Hgts.      | MI    | 48314    | Brick & Mortar |                  |
| W. Chicago-Schaefer            | 13500 W. Chicago            | Detroit             | MI    | 48228    | Brick & Mortar | X                |
| Mack-Brys                      | 21303 Mack Ave              | Grosse Pointe Woods | MI    | 48236    | Brick & Mortar |                  |
| Orchard Lake-Lone Pine         | 4430 Orchard Lake           | W. Bloomfield       | MI    | 48323    | Brick & Mortar |                  |
| Hayes-Hall                     | 15301 Hall Rd               | Macomb Twp          | MI    | 48044    | Brick & Mortar |                  |
| Thirteen Mile-Van Dyke         | 30500 Van Dyke              | Warren              | MI    | 48093    | Brick & Mortar | X                |
| Twelve Mile-Ryan               | 29409 Ryan Rd.              | Warren              | MI    | 48092    | Brick & Mortar |                  |
| Ten Mile-Ryan                  | 4225 Ten Mile Rd            | Warren              | MI    | 48091    | Brick & Mortar | X                |
| Ford-Sheldon                   | 44880 Ford Rd               | Canton Twp.         | MI    | 48187    | Brick & Mortar |                  |
| Woodward-Winthrop              | 43332 Woodward Ave          | Bloomfield Hills    | MI    | 48302    | Brick & Mortar |                  |
| Telegraph-Long Lake            | 3910 Telegraph Rd., Ste 100 | Bloomfield Hills    | MI    | 48302    | Brick & Mortar |                  |
| Sixteen Mile-Van Dyke          | 36910 Van Dyke              | Sterling Hgts.      | MI    | 48312    | Brick & Mortar | X                |
| Seventeen Mile-Ryan            | 4200 Seventeen Mile Rd      | Sterling Hgts.      | MI    | 48310    | Brick & Mortar | X                |
| Rochester-Wattles              | 4035 Rochester Rd           | Troy                | MI    | 48098    | Brick & Mortar |                  |
| Five Mile-Merriman             | 31425 Five Mile Rd          | Livonia             | MI    | 48154    | Brick & Mortar |                  |
| Laurel Park-Six Mile           | 17111 N. Laurel Park Dr     | Livonia             | MI    | 48152    | Brick & Mortar |                  |
| Harper-Grossedale              | 30200 Harper                | St. Clair Shores    | MI    | 48082    | Brick & Mortar |                  |
| Twenty Three Mile-Chesterfield | 32777 Twenty Three Mile Rd  | New Baltimore       | MI    | 48047    | Brick & Mortar |                  |
| Ten Mile-Haggerty              | 39475 W. Ten Mile Rd        | Novi                | MI    | 48375    | Brick & Mortar |                  |
| M/59-Oakland Airport           | 7070 Highland Rd.           | Waterford           | MI    | 48327    | Brick & Mortar |                  |

| Name                               | Address                   | City                | State | ZIP Code | Service Type   | LMI Census Tract |
|------------------------------------|---------------------------|---------------------|-------|----------|----------------|------------------|
| Royal Oak                          | 323 S. Main Street        | Royal Oak           | MI    | 48067    | Brick & Mortar |                  |
| Union Lake-Commerce                | 3000 Union Lake           | Commerce Twp.       | MI    | 48382    | Brick & Mortar |                  |
| Ten Mile-Telegraph                 | 24770 Telegraph Rd        | Southfield          | MI    | 48034    | Brick & Mortar | X                |
| Grand River-Hilton                 | 8250 Hilton Rd            | Brighton            | MI    | 48114    | Brick & Mortar |                  |
| Twenty Four Mile-Hayes             | 15251 Twenty Four Mile Rd | Macomb Twp          | MI    | 48042    | Brick & Mortar |                  |
| Twelve Mile-Halstead<br>ComeriMART | 37550 Twelve Mile Rd.     | Farmington<br>Hills | MI    | 48331    | Brick & Mortar |                  |
| Gratiot-Chene                      | 2281 Gratiot Ave          | Detroit             | MI    | 48207    | Brick & Mortar | X                |
| Fisher-St. Paul                    | 415 Fisher Rd             | Grosse Pointe       | MI    | 48230    | Brick & Mortar |                  |
| M/59-Elizabeth Lake<br>ComeriMART  | 10951 Highland Rd         | White Lake<br>Twp.  | MI    | 48386    | Retail         |                  |
| Pontiac Trail-Beck<br>ComeriMART   | 47060 Pontiac Trail       | Walled Lake         | MI    | 48390    | Brick & Mortar |                  |
| Five Mile-Haggerty<br>ComeriMART   | 15455 Haggerty Rd         | Plymouth            | MI    | 48170    | Brick & Mortar |                  |
| Adams-Silverbell                   | 4980 Adams Rd             | Rochester Hills     | MI    | 48306    | Brick & Mortar |                  |
| West Allen                         | 23120 Allen Rd.           | Woodhaven           | MI    | 48183    | Brick & Mortar |                  |
| Jackson-Zeeb                       | 5370 Jackson Rd.          | Ann Arbor           | MI    | 48103    | Brick & Mortar |                  |
| Lake Orion                         | 1237 S. Lapeer            | Lake Orion          | MI    | 48360    | Brick & Mortar |                  |
| Five Mile-Beck                     | 16081 Technology          | Northville          | MI    | 48168    | Brick & Mortar |                  |
| Twenty Six Mile-Van<br>Dyke        | 8660 Twenty Six Mile Rd.  | Shelby Twp          | MI    | 48316    | Brick & Mortar | X                |
| I/75-Baldwin                       | 260 Brown                 | Auburn Hills        | MI    | 48326    | Brick & Mortar |                  |
| Grand River-Beck                   | 47440 Grand River         | Novi                | MI    | 48374    | Brick & Mortar |                  |
| Lyon Township                      | 30244 Milford             | New Hudson          | MI    | 48165    | Brick & Mortar |                  |
| Michigan-Canton                    | 45420 Michigan Ave        | Canton              | MI    | 48188    | Brick & Mortar |                  |
| Twenty One Mile-Card               | 21455 Twenty One Mile Rd  | Macomb Twp          | MI    | 48044    | Brick & Mortar |                  |

| Name                  | Address               | City          | State | ZIP Code | Service Type   | LMI Census Tract |
|-----------------------|-----------------------|---------------|-------|----------|----------------|------------------|
| Dixie-Deer Lake       | 7505 Dixie Hwy        | Clarkston     | MI    | 48346    | Brick & Mortar |                  |
| Latson-Grand River    | 1050 S. Latson        | Howell        | MI    | 48843    | Brick & Mortar |                  |
| N. Washington Square  | 101 N. Washington Sq  | Lansing       | MI    | 48933    | Brick & Mortar | X                |
| Jolly-Cedar           | 5226 Cedar St         | Lansing       | MI    | 48911    | Brick & Mortar | X                |
| Lansing Mall          | 5510 W. Saginaw       | Lansing       | MI    | 48917    | Brick & Mortar |                  |
| Frاندor               | 223 Clippert St       | Lansing       | MI    | 48912    | Brick & Mortar |                  |
| Meridian Mall         | 4829 Marsh Rd         | Okemos        | MI    | 48864    | Brick & Mortar |                  |
| Kerrville Main        | 1075 Junction Hwy     | Kerrville     | TX    | 78028    | Brick & Mortar | X                |
| Ingram                | 3186 Junction Hwy     | Ingram        | TX    | 78025    | Brick & Mortar |                  |
| Camp Bowie - Ridglea  | 6388 Camp Bowie Blvd  | Fort Worth    | TX    | 76116    | Brick & Mortar |                  |
| Wheatland-I20         | 2875 W. Wheatland Rd  | Dallas        | TX    | 75237    | Brick & Mortar | X                |
| Main-Huron            | 101 N. Main St.       | Ann Arbor     | MI    | 48104    | Brick & Mortar |                  |
| Washtenaw-Huron Pkwy. | 3305 Washtenaw        | Ann Arbor     | MI    | 48104    | Brick & Mortar |                  |
| Stadium Blvd.-Pauline | 1969 W. Stadium Blvd. | Ann Arbor     | MI    | 48103    | Brick & Mortar | X                |
| S. State-Eisenhower   | 3001 S. State St      | Ann Arbor     | MI    | 48108    | Brick & Mortar |                  |
| Plymouth-Nixon        | 2665 Plymouth Rd      | Ann Arbor     | MI    | 48105    | Brick & Mortar |                  |
| Muskegon Heights      | 2730 Sanford          | Muskegon Hgts | MI    | 49444    | Brick & Mortar | X                |
| Northside             | 414 Center St         | N. Muskegon   | MI    | 49445    | Brick & Mortar |                  |
| Norton Shores         | 875 W. Norton Ave     | Norton Shores | MI    | 49441    | Brick & Mortar |                  |
| Eastside- Muskegon    | 2133 E. Apple Ave     | Muskegon      | MI    | 49442    | Brick & Mortar |                  |
| 35th & Jefferson      | 1701 W. 35th St       | Austin        | TX    | 78703    | Brick & Mortar |                  |
| Anderson-Burnet       | 7820 Burnet Rd.       | Austin        | TX    | 78757    | Brick & Mortar |                  |
| The Colony            | 4730 SH 121           | The Colony    | TX    | 75056    | Brick & Mortar |                  |



| Name                           | Address                      | City         | State | ZIP Code | Service Type   | LMI Census Tract |
|--------------------------------|------------------------------|--------------|-------|----------|----------------|------------------|
| Fort Worth-Bahama              | 2727 Fort Worth Avenue       | Dallas       | TX    | 75211    | Brick & Mortar | X                |
| Sundance Square - The Carnegie | 421 W. 3rd St. Ste. 101      | Fort Worth   | TX    | 76102    | Brick & Mortar |                  |
| Mockingbird - Stemmons         | 1250 Mockingbird Lane Ste. 1 | Dallas       | TX    | 75247    | Brick & Mortar | X                |
| Greenville-Lovers Ln           | 5302 Greenville Ave.         | Dallas       | TX    | 75206    | Brick & Mortar |                  |
| Duncanville                    | 338 S. Cedar Ridge           | Duncanville  | TX    | 75116    | Brick & Mortar | X                |
| Mansfield Financial Center     | 2901 Hwy 157 N               | Mansfield    | TX    | 76063    | Brick & Mortar |                  |
| Snider Plaza                   | 6829 Hillcrest Ave.          | Dallas       | TX    | 75205    | Brick & Mortar |                  |
| Lovers-Devonshire              | 5647 West Lovers Lane        | Dallas       | TX    | 75209    | Brick & Mortar |                  |
| Preston John Hickman           | 4111 Preston Road            | Frisco       | TX    | 75034    | Brick & Mortar |                  |
| Woodland Mall                  | 3215 28th Street SE,         | Kentwood     | MI    | 49512    | Brick & Mortar |                  |
| 52nd-Kalamazoo                 | 5135 Kalamazoo SE            | Kentwood     | MI    | 49508    | Brick & Mortar |                  |
| Campau Square                  | 99 Monroe Ave. NW            | Grand Rapids | MI    | 49503    | Brick & Mortar |                  |
| Grandville                     | 4480 Wilson Ave              | Grandville   | MI    | 49418    | Brick & Mortar |                  |
| Cascade                        | 6511 28th Street SE          | Grand Rapids | MI    | 49546    | Brick & Mortar |                  |
| Plainfield                     | 4065 Plainfield Ave. NE      | Grand Rapids | MI    | 49525    | Brick & Mortar |                  |
| Four Mile-Alpine               | 857 Four Mile Rd             | Grand Rapids | MI    | 49544    | Brick & Mortar |                  |
| Champions                      | 6333 FM 1960 Rd              | W Houston    | TX    | 77069    | Brick & Mortar |                  |
| Heights                        | 414 W. 19th St.              | Houston      | TX    | 77008    | Brick & Mortar |                  |
| Mangum                         | 2201 Mangum Rd               | Houston      | TX    | 77092    | Brick & Mortar | X                |
| Upper Kirby                    | 2575 Kirby Dr.               | Houston      | TX    | 77019    | Brick & Mortar |                  |
| Cypress Station                | 855 FM 1960 W                | Houston      | TX    | 77090    | Brick & Mortar | X                |
| 2 Riverway                     | 2 Riverway, Ste. 160         | Houston      | TX    | 77056    | Brick & Mortar |                  |

| Name                      | Address                       | City          | State | ZIP Code | Service Type   | LMI Census Tract |
|---------------------------|-------------------------------|---------------|-------|----------|----------------|------------------|
| Maple Hill                | 5080 W. Main                  | Kalamazoo     | MI    | 49009    | Brick & Mortar |                  |
| Downtown Main Office      | 151 S. Rose St                | Kalamazoo     | MI    | 49007    | Brick & Mortar |                  |
| Portage                   | 7941 S. Westnedge             | Portage       | MI    | 49002    | Brick & Mortar |                  |
| Oakwood                   | 2025 Whites Rd                | Kalamazoo     | MI    | 49008    | Brick & Mortar |                  |
| Gull Road                 | 5560 Gull Rd                  | Kalamazoo     | MI    | 49048    | Brick & Mortar | X                |
| Bayou Bend                | 5440 Memorial Dr              | Houston       | TX    | 77007    | Brick & Mortar |                  |
| Pasadena-Spencer Highway  | 4041 Spencer Hwy              | Pasadena      | TX    | 77504    | Brick & Mortar | X                |
| Clear Lake                | 16211 Space Center            | Houston       | TX    | 77062    | Brick & Mortar |                  |
| Almeda                    | 13300 Almeda Rd               | Houston       | TX    | 77045    | Brick & Mortar | X                |
| Bellaire                  | 5408 Bissonnet St             | Bellaire      | TX    | 77401    | Brick & Mortar |                  |
| Deer Park                 | 1500 Center St.               | Deer Park     | TX    | 77536    | Brick & Mortar |                  |
| Pontiac Trail-Eleven Mile | 25950 Pontiac Trail Rd        | South Lyons   | MI    | 48178    | Brick & Mortar |                  |
| Maple-M5                  | 2730 W. Maple                 | Commerce Twp. | MI    | 48390    | Brick & Mortar |                  |
| Sashabaw-Clarkston        | 7789 Sashabaw Rd              | Clarkston     | MI    | 48348    | Retail         |                  |
| Phoenix - 44th & Thomas   | 2804 N. 44th St               | Phoenix       | AZ    | 85008    | Brick & Mortar | X                |
| Torrance Towne Center     | 2795 Pacific Coast Hwy        | Torrance      | CA    | 90505    | Retail         |                  |
| Escondido                 | 260 W. Grand Avenue           | Escondido     | CA    | 92025    | Brick & Mortar | X                |
| Alameda                   | 2416 Central Avenue           | Alameda       | CA    | 94501    | Brick & Mortar |                  |
| Santa Monica Main         | 400 Wilshire Blvd., Suite 400 | Santa Monica  | CA    | 90401    | Brick & Mortar |                  |
| Surprise - Bell & Bullard | 14211 W. Bell Road            | Surprise      | AZ    | 85374    | Brick & Mortar |                  |
| 20th & Camelback          | 1959 E. Camelback Rd          | Phoenix       | AZ    | 85016    | Brick & Mortar |                  |
| Hayward                   | 858 B Street                  | Hayward       | CA    | 94541    | Brick & Mortar | X                |

| Name                           | Address                          | City             | State | ZIP Code | Service Type   | LMI Census Tract |
|--------------------------------|----------------------------------|------------------|-------|----------|----------------|------------------|
| Glendale (Brand & Milford)     | 525 N. Brand Blvd. Suite 101     | Glendale         | CA    | 91203    | Brick & Mortar | X                |
| San Juan Capistrano            | 32022 Camino Capistrano, Ste. F3 | SJ Capistrano    | CA    | 92675    | Brick & Mortar |                  |
| Westlake Village               | 2915 Townsgate Road              | Westlake Village | CA    | 91361    | Brick & Mortar |                  |
| Sunset Blvd-Doheny Drive       | 9200 Sunset Blvd., Suite 150     | West Hollywood   | CA    | 90069    | Brick & Mortar |                  |
| San Leandro                    | 1301 E 14th Street               | San Leandro      | CA    | 94577    | Brick & Mortar |                  |
| Chino Hills                    | 13920 City Center Dr. #4000      | Chino Hills      | CA    | 91709    | Retail         |                  |
| Mission Valley                 | 2307 Fenton Parkway, Ste. C109   | San Diego        | CA    | 92108    | Brick & Mortar | X                |
| 75th & Thunderbird             | 7525 West Thunderbird Rd         | Peoria           | AZ    | 85381    | Brick & Mortar |                  |
| Carlsbad-El Camino & Hops      | 2626 El Camino Real Ste C        | Carlsbad         | CA    | 92008    | Brick & Mortar |                  |
| Pleasanton                     | 600 Main St.                     | Pleasanton       | CA    | 94566    | Brick & Mortar |                  |
| Scottsdale - McDowell          | 7170 E. McDowell Rd.             | Scottsdale       | AZ    | 85257    | Brick & Mortar |                  |
| Goodyear - Estrella Falls Mall | 1831 N. Pebble Creek Parkway     | Goodyear         | AZ    | 85395    | Brick & Mortar |                  |
| Los Angeles-Koreatown          | 635 S Hobart Blvd, Suite B       | Los Angeles      | CA    | 90005    | Brick & Mortar | X                |
| Vista-Melrose                  | 625 S. Melrose Drive             | Vista            | CA    | 92081    | Brick & Mortar |                  |
| Mira Mesa                      | 9350 Mira Mesa Blvd              | San Diego        | CA    | 92126    | Brick & Mortar |                  |
| Rancho Cucamonga               | 12035 Foothill Blvd              | Rancho Cucamonga | CA    | 91730    | Brick & Mortar |                  |
| Fremont                        | 39008 Paseo Padre Parkway        | Fremont          | CA    | 94538    | Brick & Mortar |                  |
| Eastman                        | 1616 N. Saginaw                  | Midland          | MI    | 48640    | Brick & Mortar |                  |
| Eastside -San Antonio          | 230 S WW White Rd                | San Antonio      | TX    | 78219    | Brick & Mortar | X                |
| Alamo Heights                  | 4040 Broadway, Ste. 110          | San Antonio      | TX    | 78209    | Brick & Mortar |                  |
| Highway 281                    | 13750 San Pedro, Ste. 100        | San Antonio      | TX    | 78232    | Brick & Mortar | X                |

| Name                         | Address                      | City            | State | ZIP Code | Service Type   | LMI Census Tract |
|------------------------------|------------------------------|-----------------|-------|----------|----------------|------------------|
| Downtown San Antonio         | 100 N Santa Rosa St. Ste 110 | San Antonio     | TX    | 78207    | Brick & Mortar |                  |
| North Loop 410               | 615 NW Loop 410 Ste. 100     | San Antonio     | TX    | 78216    | Brick & Mortar | X                |
| Northshore                   | 12727 E Fwy                  | Houston         | TX    | 77015    | Brick & Mortar | X                |
| Jackson Main                 | 301 N. Jackson St.           | Jackson         | MI    | 49201    | Brick & Mortar |                  |
| Humble West                  | 8450 FM 1960 Bypass Rd W     | Humble          | TX    | 77338    | Brick & Mortar | X                |
| Westwood                     | 1620 W. Michigan Ave.        | Jackson         | MI    | 49202    | Brick & Mortar | X                |
| Airport Road                 | 2707 Airport Rd              | Jackson         | MI    | 49202    | Brick & Mortar | X                |
| Spring Arbor                 | 7991 Spring Arbor Rd         | Spring Arbor    | MI    | 49283    | Brick & Mortar |                  |
| Pearland                     | 11151 Broadway               | Pearland        | TX    | 77584    | Brick & Mortar |                  |
| Westlake-Bee Cave Rd.        | 3801 Bee Cave Road           | West Lake Hills | TX    | 78746    | Brick & Mortar |                  |
| Fossil Creek                 | 4351 Western Center          | Fort Worth      | TX    | 76137    | Brick & Mortar |                  |
| Atascocita                   | 6803 FM 1960 Rd. E.          | Humble          | TX    | 77346    | Brick & Mortar |                  |
| Bryant Irvin & Overton Ridge | 5925 Overton Ridge           | Fort Worth      | TX    | 76132    | Brick & Mortar | X                |
| Highway 249 / Louetta        | 10939 Louetta Road           | Houston         | TX    | 77070    | Brick & Mortar |                  |
| Bedford                      | 2120 Central Drive           | Bedford         | TX    | 76021    | Brick & Mortar |                  |
| Katy Mason                   | 810 South Mason Road         | Katy            | TX    | 77450    | Brick & Mortar |                  |
| Westheimer Pkwy              | 23330 Westheimer Pkwy        | Katy            | TX    | 77494    | Retail         |                  |
| Windermere-1960              | 11990 FM 1960 Road West      | Houston         | TX    | 77065    | Retail         |                  |
| Towne Centre-635             | 18965 LBJ Frwy               | Mesquite        | TX    | 75150    | Brick & Mortar | X                |
| Coit-121                     | 3700 S.H. 121                | Plano           | TX    | 75025    | Retail         |                  |
| Preston Rd-Mapleshade        | 19176 Preston Rd             | Dallas          | TX    | 75252    | Brick & Mortar |                  |
| Fluor Daniel Dr-Hwy 6        | 1525 Highway 6               | Sugar Land      | TX    | 77478    | Retail         |                  |
| Berrington-Hwy 6             | 8707 Hwy 6 South             | Houston         | TX    | 77083    | Retail         |                  |

| Name                   | Address                       | City         | State | ZIP Code | Service Type   | LMI Census Tract |
|------------------------|-------------------------------|--------------|-------|----------|----------------|------------------|
| Parmer & I-35          | 13200 N. IH 35, Bldg. C       | Austin       | TX    | 78753    | Brick & Mortar |                  |
| Avery Ranch            | 14950 Avery Ranch Blvd        | Austin       | TX    | 78717    | Brick & Mortar |                  |
| Cedar Park             | 810 E. Whitestone Blvd Bldg C | Cedar Park   | TX    | 78613    | Brick & Mortar | X                |
| Belt Line Rd - Hwy 161 | 4901 N. Belt Line Rd          | Irving       | TX    | 75038    | Brick & Mortar | X                |
| Greenspoint            | 370 Greens Rd                 | Houston      | TX    | 77060    | Brick & Mortar | X                |
| Research Forest        | 1600 Research Forest Dr,      | Shenandoah   | TX    | 77381    | Brick & Mortar |                  |
| Central                | 49 W. Michigan Ave.           | Battle Creek | MI    | 49017    | Brick & Mortar | X                |
| Springfield            | 215 N. 20th Street            | Battle Creek | MI    | 49037    | Brick & Mortar |                  |
| Highway 6              | 6985 Hwy 6 N                  | Houston      | TX    | 77084    | Brick & Mortar |                  |
| Buffalo Speedway       | 3135 Southwest Frwy           | Houston      | TX    | 77098    | Brick & Mortar |                  |
| Woodlands Pkwy         | 6417 Woodlands Pkwy           | Woodlands    | TX    | 77381    | Brick & Mortar |                  |
| San Felipe-Winrock     | 6412 San Felipe St            | Houston      | TX    | 77057    | Brick & Mortar |                  |
| Briar Forest           | 10489 Briar Forest Dr         | Houston      | TX    | 77042    | Brick & Mortar |                  |
| Hedwig Village         | 8899 Katy Freeway             | Houston      | TX    | 77024    | Brick & Mortar |                  |
| Gulfgate               | 200 Gulfgate Mall             | Houston      | TX    | 77087    | Retail         |                  |
| Las Colinas-114        | 1050 W. John Carpenter Fwy    | Irving       | TX    | 75039    | Brick & Mortar |                  |
| Bishop-Colorado        | 1222 N. Bishop Ave. Suite 100 | Dallas       | TX    | 75208    | Brick & Mortar |                  |
| Page & Tollway         | 8422 Dallas Pkwy              | Frisco       | TX    | 75034    | Brick & Mortar |                  |
| Garland-Jupiter        | 11155 Garland Road            | Dallas       | TX    | 75218    | Brick & Mortar |                  |
| Abrams-Goliad          | 2311 Abrams Road              | Dallas       | TX    | 75214    | Brick & Mortar |                  |
| R L Thornton           | 5201 E. R L Thornton          | Dallas       | TX    | 75223    | Brick & Mortar | X                |
| Forest-Inwood          | 5200 Forest Lane              | Dallas       | TX    | 75244    | Brick & Mortar |                  |
| Cooper-I20             | 4145 S. Cooper St.            | Arlington    | TX    | 76015    | Brick & Mortar |                  |

| Name                     | Address                  | City         | State | ZIP Code | Service Type   | LMI Census Tract |
|--------------------------|--------------------------|--------------|-------|----------|----------------|------------------|
| Lamar-Lincoln            | 707 E. Lamar             | Arlington    | TX    | 76011    | Brick & Mortar | X                |
| Richardson-Belt Line     | 1201 E. Beltline Road    | Richardson   | TX    | 75081    | Brick & Mortar |                  |
| Forest-Webb Chapel       | 3115 Forest Lane         | Dallas       | TX    | 75234    | Brick & Mortar | X                |
| Wynnewood Center         | 753 W. Illinois Ave      | Dallas       | TX    | 75224    | Brick & Mortar | X                |
| Mockingbird-Abrams       | 6260 E. Mockingbird      | Dallas       | TX    | 75214    | Brick & Mortar |                  |
| Irving Blvd-O'Connor     | 301 W. Irving Blvd       | Irving       | TX    | 75060    | Brick & Mortar | X                |
| Skillman-Abrams          | 6410 Larmanda            | Dallas       | TX    | 75231    | Drive Through  |                  |
| Preston Center           | 8225 Preston Rd          | Dallas       | TX    | 75225    | Brick & Mortar |                  |
| Midway-Spring Valley     | 4102 Spring Valley       | Dallas       | TX    | 75244    | Brick & Mortar |                  |
| Campbell-Central         | 910 E. Campbell Road     | Richardson   | TX    | 75081    | Brick & Mortar |                  |
| Lewisville               | 1686 S. State Hwy 121    | Lewisville   | TX    | 75067    | Brick & Mortar | X                |
| McDermott-75             | 805 McDermott            | Allen        | TX    | 75013    | Brick & Mortar |                  |
| Coppell                  | 128 N. Denton Tap Road   | Coppell      | TX    | 75019    | Brick & Mortar |                  |
| N. Garland-Naaman Forest | 4950 N. Garland Ave      | Garland      | TX    | 75040    | Brick & Mortar | X                |
| Chapel Hill-Tollway      | 2560 Dallas Parkway      | Plano        | TX    | 75093    | Brick & Mortar |                  |
| Forest-Plano             | 10601 Forest Lane        | Dallas       | TX    | 75243    | Brick & Mortar | X                |
| Stacy Rd-Angel Parkway   | 1610 E Stacy Rd          | Allen        | TX    | 75002    | Brick & Mortar |                  |
| Parker-Premier           | 3310 Premier Road        | Plano        | TX    | 75023    | Brick & Mortar |                  |
| Preston-Headquarters     | 8208 Preston Road        | Plano        | TX    | 75024    | Brick & Mortar |                  |
| Comerica Bank Tower      | 1717 Main Street         | Dallas       | TX    | 75201    | Brick & Mortar |                  |
| Josey-Trinity Mills      | 2625 N. Josey Ln Ste 200 | Carrollton   | TX    | 75007    | Brick & Mortar |                  |
| Hampton-Wintergreen      | 1483 N. Hampton          | DeSoto       | TX    | 75115    | Brick & Mortar |                  |
| Pflugerville             | 1713 FM 685 Suite 170    | Pflugerville | TX    | 78660    | Brick & Mortar |                  |

| Name                 | Address                           | City               | State | ZIP Code | Service Type   | LMI Census Tract |
|----------------------|-----------------------------------|--------------------|-------|----------|----------------|------------------|
| Northeast Austin     | 2315 E. Anderson Ln               | Austin             | TX    | 78752    | Brick & Mortar | X                |
| Downtown Austin      | 300 West 6th Street, Suite 120    | Austin             | TX    | 78701    | Brick & Mortar |                  |
| Tarrytown            | 2414 Exposition Blvd., Ste. D-110 | Austin             | TX    | 78703    | Brick & Mortar |                  |
| Northwest 290        | 14104 Northwest Freeway           | Houston            | TX    | 77040    | Brick & Mortar | X                |
| Gessner-Kempwood     | 2820 Gessner Drive                | Houston            | TX    | 77080    | Brick & Mortar |                  |
| Memorial             | 14606 Memorial Drive              | Houston            | TX    | 77079    | Brick & Mortar | X                |
| Sugar Creek          | One Sugar Creek Ctr Blvd          | Sugar Land         | TX    | 77478    | Brick & Mortar |                  |
| NorthPark            | 8850 Boedeker Street              | Dallas             | TX    | 75225    | Brick & Mortar |                  |
| Airport              | 9100 Airport Blvd                 | Houston            | TX    | 77061    | Brick & Mortar | X                |
| Two Shell Plaza      | 811 Louisiana St. Ste. M220       | Houston            | TX    | 77002    | Brick & Mortar |                  |
| Lockwood             | 800 Lockwood Drive                | Houston            | TX    | 77020    | Brick & Mortar | X                |
| Galena Park          | 1515 Clinton Dr                   | Galena Park        | TX    | 77547    | Brick & Mortar | X                |
| Friendswood          | 203 S. Friendswood                | Friendswood        | TX    | 77546    | Brick & Mortar |                  |
| Broward-NE Third     | 100 NE 3rd Ave., Ste 100          | Fort Lauderdale    | FL    | 33301    | Brick & Mortar |                  |
| Palm Beach Gardens   | 2401 PGA Blvd., Ste 198           | Palm Beach Gardens | FL    | 33410    | Brick & Mortar |                  |
| Wellington           | 1037 State Rd. 7, Ste 117         | Wellington         | FL    | 33414    | Retail         |                  |
| Singer Island Bridge | 155 E. Blue Heron Blvd., Ste. 100 | Riviera Beach      | FL    | 33404    | Brick & Mortar | X                |
| East Boca            | 1 S. Federal Hwy                  | Boca Raton         | FL    | 33432    | Brick & Mortar |                  |
| Almaden Valley       | 1092 Blossom Hill Road            | San Jose           | CA    | 95123    | Brick & Mortar |                  |
| Mesa-Val Vista       | 1825 S. Val Vista Drive           | Mesa               | AZ    | 85204    | Retail         |                  |
| Scottsdale-Greenway  | 14801 N. Scottsdale Rd            | Scottsdale         | AZ    | 85254    | Retail         |                  |
| Brentwood            | 12001 San Vicente Blvd            | Los Angeles        | CA    | 90049    | Retail         |                  |

| Name                    | Address                               | City             | State | ZIP Code | Service Type   | LMI Census Tract |
|-------------------------|---------------------------------------|------------------|-------|----------|----------------|------------------|
| Silver Creek            | 5601 Silver Creek Valley Rd           | San Jose         | CA    | 95138    | Retail         |                  |
| Pasadena                | 35 North Lake Avenue Suite 120        | Pasadena         | CA    | 91101    | Brick & Mortar |                  |
| Huntington Beach        | 17011 Beach Blvd., Suite 100          | Huntington Beach | CA    | 92647    | Brick & Mortar | X                |
| Newport Beach-Westcliff | 2131 Westcliff Drive                  | Newport Beach    | CA    | 92660    | Brick & Mortar |                  |
| La Jolla                | 9255 Town Centre Drive, Suite 110     | San Diego        | CA    | 92121    | Brick & Mortar |                  |
| Willow Glen             | 1191 Lincoln Ave                      | San Jose         | CA    | 95125    | Brick & Mortar |                  |
| San Mateo               | 444 S. El Camino Real                 | San Mateo        | CA    | 94402    | Brick & Mortar |                  |
| Ontario                 | 4295 Concoors Street                  | Ontario          | CA    | 91764    | Brick & Mortar | X                |
| San Jose Main           | 333 West Santa Clara Street           | San Jose         | CA    | 95113    | Brick & Mortar |                  |
| Sunnyvale               | 800 East El Camino Real               | Sunnyvale        | CA    | 94087    | Brick & Mortar |                  |
| City of Industry        | 13200 Crossroads Pkwy North Suite 100 | City of Industry | CA    | 91746    | Brick & Mortar |                  |
| Burlingame              | 1351 Howard Ave                       | Burlingame       | CA    | 94010    | Brick & Mortar |                  |
| Costa Mesa              | 611 Anton Blvd, Suite 100             | Costa Mesa       | CA    | 92626    | Brick & Mortar |                  |
| Palo Alto               | 250 Lytton Avenue                     | Palo Alto        | CA    | 94301    | Brick & Mortar |                  |
| Los Altos               | 275 Third Street                      | Los Altos        | CA    | 94022    | Brick & Mortar |                  |
| Winchester              | 1245 South Winchester Blvd            | San Jose         | CA    | 95128    | Brick & Mortar |                  |
| Cupertino               | 10020 North De Anza Blvd              | Cupertino        | CA    | 95014    | Brick & Mortar |                  |
| Saratoga                | 13000 Saratoga-Sunnyvale Road         | Saratoga         | CA    | 95070    | Brick & Mortar |                  |
| Los Gatos               | 444 North Santa Cruz Ave.             | Los Gatos        | CA    | 95030    | Brick & Mortar |                  |
| Milpitas                | 1289 S. Park Victoria Drive           | Milpitas         | CA    | 95035    | Brick & Mortar |                  |
| Diamond View Tower      | 955 J Street                          | San Diego        | CA    | 92101    | Brick & Mortar |                  |
| Hollywood               | 6255 W. Sunset Blvd. Suite 100        | Los Angeles      | CA    | 90028    | Brick & Mortar | X                |



| Name              | Address                          | City            | State | ZIP Code | Service Type   | LMI Census Tract |
|-------------------|----------------------------------|-----------------|-------|----------|----------------|------------------|
| Scotts Valley     | 228 Mt. Hermon Road              | Scotts Valley   | CA    | 95066    | Brick & Mortar |                  |
| Santa Cruz Main   | 25 River Street                  | Santa Cruz      | CA    | 95060    | Brick & Mortar |                  |
| Santa Cruz - East | 1237 Soquel Avenue               | Santa Cruz      | CA    | 95062    | Brick & Mortar |                  |
| Capitola          | 1960 41st Avenue                 | Capitola        | CA    | 95010    | Brick & Mortar |                  |
| Aptos             | 1 Rancho Del Mar                 | Aptos           | CA    | 95003    | Brick & Mortar |                  |
| Watsonville Sq.   | 1998 Main Street                 | Watsonville     | CA    | 95076    | Brick & Mortar | X                |
| Salinas - Main    | 430 South Main Street            | Salinas         | CA    | 93901    | Brick & Mortar | X                |
| Monterey          | 35 Bonifacio Plaza               | Monterey        | CA    | 93940    | Brick & Mortar |                  |
| Prunedale         | 7915 San Miguel Canyon Road      | Prunedale       | CA    | 93907    | Brick & Mortar |                  |
| Burbank           | 1090 N. San Fernando Blvd        | Burbank         | CA    | 91504    | Brick & Mortar |                  |
| Woodland Hills    | 5700 Canoga Ave Bldg G Suite 100 | Woodland Hills  | CA    | 91367    | Brick & Mortar |                  |
| Westwood          | 1021 Glendon Ave                 | Los Angeles     | CA    | 90024    | Brick & Mortar |                  |
| Torrance Main     | 21153 Hawthorne Blvd             | Torrance        | CA    | 90503    | Brick & Mortar |                  |
| East Long Beach   | 1650 Ximeno Avenue               | Long Beach      | CA    | 90804    | Brick & Mortar |                  |
| Long Beach        | 301 East Ocean Blvd Suite 102    | Long Beach      | CA    | 90802    | Brick & Mortar |                  |
| Lake Forest       | 23718-B El Toro Road             | Lake Forest     | CA    | 92630    | Brick & Mortar | X                |
| Millbrae          | 49 El Camino Real                | Millbrae        | CA    | 94030    | Brick & Mortar | X                |
| Encinitas         | 110 S. El Camino Real            | Encinitas       | CA    | 92024    | Retail         |                  |
| LA - Downtown     | 601 S. Figueroa Street           | Los Angeles     | CA    | 90017    | Brick & Mortar |                  |
| Manhattan Beach   | 3005 N. Sepulveda Blvd.          | Manhattan Beach | CA    | 90266    | Brick & Mortar |                  |
| Sherman Oaks      | 15303 Ventura Blvd. Ste 100      | Sherman Oaks    | CA    | 91403    | Brick & Mortar |                  |
| Beverly Hills     | 9696 South Santa Monica Blvd.    | Beverly Hills   | CA    | 90210    | Brick & Mortar |                  |

| Name                     | Address                               | City                | State | ZIP Code | Service Type   | LMI Census Tract |
|--------------------------|---------------------------------------|---------------------|-------|----------|----------------|------------------|
| SF Embarcadero           | One Embarcadero Center Street Level   | San Francisco       | CA    | 94111    | Brick & Mortar |                  |
| Walnut Creek             | 1442 N. Main Street                   | Walnut Creek        | CA    | 94596    | Brick & Mortar |                  |
| San Jose - Airport       | 226 Airport Parkway                   | San Jose            | CA    | 95110    | Retail         | X                |
| Century City             | 2000 Avenue of the Stars, Suite 110   | Los Angeles         | CA    | 90067    | Brick & Mortar |                  |
| South San Francisco      | 401 Grand Avenue                      | South San Francisco | CA    | 94080    | Brick & Mortar | X                |
| Tustin                   | 3025 El Camino Real                   | Tustin              | CA    | 92782    | Brick & Mortar |                  |
| North Central Phoenix    | 3200 N. Central Ave., Suite 100       | Phoenix             | AZ    | 85012    | Retail         | X                |
| San Ramon                | 3110 Crow Canyon Place, Suite A       | San Ramon           | CA    | 94583    | Brick & Mortar |                  |
| LA - Crenshaw            | 3825 Crenshaw Blvd Suite 101          | Los Angeles         | CA    | 90008    | Retail         | X                |
| Cypress                  | 6812 Katella Avenue                   | Cypress             | CA    | 90630    | Retail         |                  |
| Danville                 | 318 Diablo Road, Suite 100            | Danville            | CA    | 94526    | Retail         |                  |
| Carmel Mountain          | 11608 Carmel Mountain Rd              | San Diego           | CA    | 92128    | Brick & Mortar |                  |
| Carlsbad Palomar Airport | 1000 Aviara Parkway Suite 104         | Carlsbad            | CA    | 92011    | Brick & Mortar |                  |
| Anaheim - Katella        | 2432 E. Katella Bldg A                | Anaheim             | CA    | 92806    | Brick & Mortar |                  |
| Brea                     | 2500 East Imperial Highway, Suite 190 | Brea                | CA    | 92821    | Brick & Mortar |                  |
| Pacific Beach            | 1802 Garnet Ave                       | San Diego           | CA    | 92109    | Brick & Mortar |                  |
| Cerritos                 | 11355 South Street                    | Cerritos            | CA    | 90703    | Brick & Mortar |                  |
| Phoenix - Happy Valley   | 2025 W. Happy Valley Rd.              | Phoenix             | AZ    | 85085    | Brick & Mortar |                  |
| Mesa Riverview           | 925 N. Dobson Road                    | Mesa                | AZ    | 85201    | Brick & Mortar | X                |
| Avondale - McDowell      | 10115 W. McDowell Road                | Avondale            | AZ    | 85392    | Brick & Mortar | X                |
| Marina Del Rey           | 4040 Lincoln Blvd                     | Marina Del Rey      | CA    | 90292    | Brick & Mortar |                  |
| San Carlos               | 644 Laurel Street                     | San Carlos          | CA    | 94070    | Brick & Mortar |                  |

| Name           | Address              | City           | State | ZIP Code | Service Type   | LMI Census Tract |
|----------------|----------------------|----------------|-------|----------|----------------|------------------|
| La Mesa        | 5450 Jackson Dr      | La Mesa        | CA    | 91942    | Brick & Mortar | X                |
| South Pasadena | 824 Fair Oaks Avenue | South Pasadena | CA    | 91030    | Brick & Mortar |                  |

### Other Comerica Bank Offices

| Address                                       | Activities (e.g., LPO, Rep Office, Ops centers, Call Centers, etc.) |
|-----------------------------------------------|---------------------------------------------------------------------|
| 1840 Century Park E., Los Angeles, CA         | LPO                                                                 |
| 250 Lytton Ave., Palo Alto, CA 94301          | LPO                                                                 |
| 26455 Corporate Dr., Farmington, MI 48331     | Comerica Great Lakes Corporate Campus                               |
| 230 Park Ave., New York, NY 10169             | LPO                                                                 |
| 2121 Sage Rd., Houston, TX 77056              | LPO                                                                 |
| 2600 S. Gessner Rd., Houston, TX 77063        | LPO                                                                 |
| 201 Main St., Fort Worth, TX 76102            | LPO                                                                 |
| Bank of Nova Scotia Bldg., Georgetown, Canada | Cayman Islands “plaque” branch                                      |

### Comerica Bank & Trust

Comerica Bank & Trust has no branches.

**Public Exhibit 9**

**Form of Newspaper Notice**

## **Notice of Application for Merger of Bank Holding Companies**

Fifth Third Bancorp, Cincinnati, Ohio (“Fifth Third”), and its wholly owned subsidiary, Fifth Third Financial Corporation, Cincinnati, Ohio (“Fifth Third Financial” and, with Fifth Third, the “Applicants”) have applied to the Federal Reserve Board for (i) permission to acquire another bank holding company, Comerica Incorporated, Dallas, Texas (“Comerica”), by merging Comerica with and into Fifth Third Financial, and thereby acquire control of Comerica’s two subsidiary banks, Comerica Bank, Dallas, Texas, and Comerica Bank & Trust, National Association, Ann Arbor, Michigan (the “Acquisition”) and (ii) permission for Fifth Third Financial to merge immediately following the Acquisition with another bank holding company, Comerica Holdings Incorporated, Dallas, Texas, a wholly owned subsidiary of Comerica (“Comerica Holdings”), with Fifth Third Financial continuing as the surviving corporation. We intend to acquire control of the wholly owned subsidiary banks of Comerica and Comerica Holdings, Comerica Bank, Dallas, Texas, and Comerica Bank & Trust, National Association, Ann Arbor, Michigan. The Federal Reserve considers a number of factors in deciding whether to approve the application, including the record of performance of banks we own in helping to meet local credit needs.

You are invited to submit comments in writing on this application/notice to the Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, OH 44114, or via e-mail: [comments.applications@clev.frb.org](mailto:comments.applications@clev.frb.org). The comment period will not end before December 1, 2025 and may be somewhat longer. The Board's procedures for processing applications/notices may be found at 12 C.F.R. Part 262. Procedures for processing protested applications/notices may be found at 12 C.F.R. 262.25. To obtain a copy of the Federal Reserve Board’s procedures, or if you need more information about how to submit your comments on the application/notice, contact Richard Ryan Schilling, Banking Supervisor, at (513) 455-4406. The Federal Reserve will consider your comments and any request for a public meeting or formal hearing on the application/notice if they are received in writing by the Reserve Bank on or before the last day of the comment period.

**Public Exhibit 10**

**Fifth Third Bank and Comerica Bank Assessment Areas**

**CRA Assessment Areas**

**Fifth Third Bank CRA Assessment Areas**

| Year | State | AA Code  | Assessment Area Name | County Name  | State Code | County Code | FIPS  |
|------|-------|----------|----------------------|--------------|------------|-------------|-------|
| 2025 | FL    | 12-15980 | Cape Coral, FL       | Lee          | 12         | 071         | 12071 |
| 2025 | FL    | 12-19660 | Deltona, FL          | Volusia      | 12         | 127         | 12127 |
| 2025 | FL    | 12-27260 | Jacksonville, FL     | Clay         | 12         | 019         | 12019 |
| 2025 | FL    | 12-27260 | Jacksonville, FL     | Duval        | 12         | 031         | 12031 |
| 2025 | FL    | 12-27260 | Jacksonville, FL     | St Johns     | 12         | 109         | 12109 |
| 2025 | FL    | 12-29460 | Lakeland, FL         | Polk         | 12         | 105         | 12105 |
| 2025 | FL    | 12-33100 | Miami, FL            | Broward      | 12         | 011         | 12011 |
| 2025 | FL    | 12-33100 | Miami, FL            | Miami-Dade   | 12         | 086         | 12086 |
| 2025 | FL    | 12-33100 | Miami, FL            | Palm Beach   | 12         | 099         | 12099 |
| 2025 | FL    | 12-34940 | Naples, FL           | Collier      | 12         | 021         | 12021 |
| 2025 | FL    | 12-35840 | North Port, FL       | Manatee      | 12         | 081         | 12081 |
| 2025 | FL    | 12-35840 | North Port, FL       | Sarasota     | 12         | 115         | 12115 |
| 2025 | FL    | 12-36100 | Ocala, FL            | Marion       | 12         | 083         | 12083 |
| 2025 | FL    | 12-36740 | Orlando, FL          | Lake         | 12         | 069         | 12069 |
| 2025 | FL    | 12-36740 | Orlando, FL          | Orange       | 12         | 095         | 12095 |
| 2025 | FL    | 12-36740 | Orlando, FL          | Osceola      | 12         | 097         | 12097 |
| 2025 | FL    | 12-36740 | Orlando, FL          | Seminole     | 12         | 117         | 12117 |
| 2025 | FL    | 12-37340 | Palm Bay, FL         | Brevard      | 12         | 009         | 12009 |
| 2025 | FL    | 12-39460 | Punta Gorda, FL      | Charlotte    | 12         | 015         | 12015 |
| 2025 | FL    | 12-45300 | Tampa, FL            | Hillsborough | 12         | 057         | 12057 |



| Year | State | AA Code  | Assessment Area Name          | County Name | State Code | County Code | FIPS  |
|------|-------|----------|-------------------------------|-------------|------------|-------------|-------|
| 2025 | FL    | 12-45300 | Tampa, FL                     | Pasco       | 12         | 101         | 12101 |
| 2025 | FL    | 12-45300 | Tampa, FL                     | Pinellas    | 12         | 103         | 12103 |
| 2025 | FL    | 12-48680 | Wildwood, FL                  | Sumter      | 12         | 119         | 12119 |
| 2025 | GA    | 13-12060 | Atlanta, GA                   | Cobb        | 13         | 067         | 13067 |
| 2025 | GA    | 13-12060 | Atlanta, GA                   | De Kalb     | 13         | 089         | 13089 |
| 2025 | GA    | 13-12060 | Atlanta, GA                   | Fulton      | 13         | 121         | 13121 |
| 2025 | GA    | 13-12060 | Atlanta, GA                   | Gwinnett    | 13         | 135         | 13135 |
| 2025 | GA    | 13-12060 | Atlanta, GA                   | Walton      | 13         | 297         | 13297 |
| 2025 | GA    | 13-12260 | Augusta, GA                   | Columbia    | 13         | 073         | 13073 |
| 2025 | GA    | 13-12260 | Augusta, GA                   | Richmond    | 13         | 245         | 13245 |
| 2025 | IL    | 17-40420 | Rockford, IL                  | Winnebago   | 17         | 201         | 17201 |
| 2025 | IL    | 17-N0001 | Non-MSA Effingham County, IL  | Effingham   | 17         | 049         | 17049 |
| 2025 | IL    | 17-N0002 | Non-MSA Jefferson County, IL  | Jefferson   | 17         | 081         | 17081 |
| 2025 | IL    | 17-N0003 | Non-MSA Stephenson County, IL | Stephenson  | 17         | 177         | 17177 |
| 2025 | IL    | 17-N0004 | Non-MSA Whiteside County, IL  | Whiteside   | 17         | 195         | 17195 |
| 2025 | IL    | 17-N0005 | Non-MSA Williamson County, IL | Williamson  | 17         | 199         | 17199 |
| 2025 | IN    | 18-14020 | Bloomington, IN               | Monroe      | 18         | 105         | 18105 |
| 2025 | IN    | 18-18020 | Columbus, IN                  | Bartholomew | 18         | 005         | 18005 |
| 2025 | IN    | 18-21140 | Elkhart, IN                   | Elkhart     | 18         | 039         | 18039 |
| 2025 | IN    | 18-21780 | Evansville, IN                | Posey       | 18         | 129         | 18129 |
| 2025 | IN    | 18-21780 | Evansville, IN                | Vanderburgh | 18         | 163         | 18163 |
| 2025 | IN    | 18-21780 | Evansville, IN                | Warrick     | 18         | 173         | 18173 |
| 2025 | IN    | 18-23060 | Fort Wayne, IN                | Allen       | 18         | 003         | 18003 |

| Year | State | AA Code  | Assessment Area Name                | County Name | State Code | County Code | FIPS  |
|------|-------|----------|-------------------------------------|-------------|------------|-------------|-------|
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Boone       | 18         | 011         | 18011 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Brown       | 18         | 013         | 18013 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Hamilton    | 18         | 057         | 18057 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Hancock     | 18         | 059         | 18059 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Hendricks   | 18         | 063         | 18063 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Johnson     | 18         | 081         | 18081 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Marion      | 18         | 097         | 18097 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Morgan      | 18         | 109         | 18109 |
| 2025 | IN    | 18-26900 | Indianapolis, IN                    | Shelby      | 18         | 145         | 18145 |
| 2025 | IN    | 18-29200 | Lafayette, IN                       | Tippecanoe  | 18         | 157         | 18157 |
| 2025 | IN    | 18-33140 | Michigan City, IN                   | La Porte    | 18         | 091         | 18091 |
| 2025 | IN    | 18-45460 | Terre Haute, IN                     | Sullivan    | 18         | 153         | 18153 |
| 2025 | IN    | 18-45460 | Terre Haute, IN                     | Vigo        | 18         | 167         | 18167 |
| 2025 | IN    | 18-N0001 | Non-MSA Adams County, IN            | Adams       | 18         | 001         | 18001 |
| 2025 | IN    | 18-N0002 | Non-MSA Decatur-Ripley Counties, IN | Decatur     | 18         | 031         | 18031 |
| 2025 | IN    | 18-N0002 | Non-MSA Decatur-Ripley Counties, IN | Ripley      | 18         | 137         | 18137 |
| 2025 | IN    | 18-N0003 | Non-MSA Fayette County, IN          | Fayette     | 18         | 041         | 18041 |
| 2025 | IN    | 18-N0004 | Non-MSA Gibson-Knox Counties, IN    | Gibson      | 18         | 051         | 18051 |
| 2025 | IN    | 18-N0004 | Non-MSA Gibson-Knox Counties, IN    | Knox        | 18         | 083         | 18083 |
| 2025 | IN    | 18-N0005 | Non-MSA Parke County, IN            | Parke       | 18         | 121         | 18121 |
| 2025 | IN    | 18-N0006 | Non-MSA Counties - South IN         | Dubois      | 18         | 037         | 18037 |
| 2025 | IN    | 18-N0006 | Non-MSA Counties - South IN         | Perry       | 18         | 123         | 18123 |

| Year | State | AA Code  | Assessment Area Name                 | County Name | State Code | County Code | FIPS  |
|------|-------|----------|--------------------------------------|-------------|------------|-------------|-------|
| 2025 | IN    | 18-N0006 | Non-MSA Counties - South IN          | Spencer     | 18         | 147         | 18147 |
| 2025 | IN    | 18-N0007 | Non-MSA Steuben County, IN           | Steuben     | 18         | 151         | 18151 |
| 2025 | KY    | 21-30460 | Lexington, KY                        | Bourbon     | 21         | 017         | 21017 |
| 2025 | KY    | 21-30460 | Lexington, KY                        | Fayette     | 21         | 067         | 21067 |
| 2025 | KY    | 21-30460 | Lexington, KY                        | Jessamine   | 21         | 113         | 21113 |
| 2025 | KY    | 21-30460 | Lexington, KY                        | Scott       | 21         | 209         | 21209 |
| 2025 | KY    | 21-36980 | Owensboro, KY                        | Daviess     | 21         | 059         | 21059 |
| 2025 | KY    | 21-N0001 | Non-MSA Franklin County, KY          | Franklin    | 21         | 073         | 21073 |
| 2025 | KY    | 21-N0002 | Non-MSA Harrison County, KY          | Harrison    | 21         | 097         | 21097 |
| 2025 | KY    | 21-N0003 | Non-MSA Henderson-Union Counties, KY | Henderson   | 21         | 101         | 21101 |
| 2025 | KY    | 21-N0003 | Non-MSA Henderson-Union Counties, KY | Union       | 21         | 225         | 21225 |
| 2025 | KY    | 21-N0004 | Non-MSA Hopkins Counties, KY         | Hopkins     | 21         | 107         | 21107 |
| 2025 | KY    | 21-N0005 | Non-MSA Lyon County, KY              | Lyon        | 21         | 143         | 21143 |
| 2025 | KY    | 21-N0006 | Non-MSA Madison County, KY           | Madison     | 21         | 151         | 21151 |
| 2025 | KY    | 21-N0007 | Non-MSA Mercer County, KY            | Mercer      | 21         | 167         | 21167 |
| 2025 | MI    | 26-11460 | Ann Arbor, MI                        | Washtenaw   | 26         | 161         | 26161 |
| 2025 | MI    | 26-12980 | Battle Creek, MI                     | Calhoun     | 26         | 025         | 26025 |
| 2025 | MI    | 26-13020 | Bay City, MI                         | Bay         | 26         | 017         | 26017 |
| 2025 | MI    | 26-19820 | Detroit, MI                          | Livingston  | 26         | 093         | 26093 |
| 2025 | MI    | 26-19820 | Detroit, MI                          | Macomb      | 26         | 099         | 26099 |
| 2025 | MI    | 26-19820 | Detroit, MI                          | Oakland     | 26         | 125         | 26125 |
| 2025 | MI    | 26-19820 | Detroit, MI                          | St Clair    | 26         | 147         | 26147 |

| Year | State | AA Code  | Assessment Area Name          | County Name    | State Code | County Code | FIPS  |
|------|-------|----------|-------------------------------|----------------|------------|-------------|-------|
| 2025 | MI    | 26-19820 | Detroit, MI                   | Wayne          | 26         | 163         | 26163 |
| 2025 | MI    | 26-22420 | Flint, MI                     | Genesee        | 26         | 049         | 26049 |
| 2025 | MI    | 26-24340 | Grand Rapids, MI              | Kent           | 26         | 081         | 26081 |
| 2025 | MI    | 26-24340 | Grand Rapids, MI              | Montcalm       | 26         | 117         | 26117 |
| 2025 | MI    | 26-24340 | Grand Rapids, MI              | Ottawa         | 26         | 139         | 26139 |
| 2025 | MI    | 26-27100 | Jackson, MI                   | Jackson        | 26         | 075         | 26075 |
| 2025 | MI    | 26-28020 | Kalamazoo, MI                 | Kalamazoo      | 26         | 077         | 26077 |
| 2025 | MI    | 26-29620 | Lansing, MI                   | Clinton        | 26         | 037         | 26037 |
| 2025 | MI    | 26-29620 | Lansing, MI                   | Eaton          | 26         | 045         | 26045 |
| 2025 | MI    | 26-29620 | Lansing, MI                   | Ingham         | 26         | 065         | 26065 |
| 2025 | MI    | 26-33220 | Midland, MI                   | Midland        | 26         | 111         | 26111 |
| 2025 | MI    | 26-33780 | Monroe, MI                    | Monroe         | 26         | 115         | 26115 |
| 2025 | MI    | 26-34740 | Muskegon, MI                  | Muskegon       | 26         | 121         | 26121 |
| 2025 | MI    | 26-35660 | Niles, MI                     | Berrien        | 26         | 021         | 26021 |
| 2025 | MI    | 26-40980 | Saginaw, MI                   | Saginaw        | 26         | 145         | 26145 |
| 2025 | MI    | 26-45900 | Traverse City, MI             | Grand Traverse | 26         | 055         | 26055 |
| 2025 | MI    | 26-45900 | Traverse City, MI             | Leelanau       | 26         | 089         | 26089 |
| 2025 | MI    | 26-N0001 | Non-MSA Counties - Central MI | Isabella       | 26         | 073         | 26073 |
| 2025 | MI    | 26-N0001 | Non-MSA Counties - Central MI | Mason          | 26         | 105         | 26105 |
| 2025 | MI    | 26-N0001 | Non-MSA Counties - Central MI | Mecosta        | 26         | 107         | 26107 |
| 2025 | MI    | 26-N0001 | Non-MSA Counties - Central MI | Newaygo        | 26         | 123         | 26123 |
| 2025 | MI    | 26-N0001 | Non-MSA Counties - Central MI | Oceana         | 26         | 127         | 26127 |
| 2025 | MI    | 26-N0002 | Non-MSA Emmet County, MI      | Emmet          | 26         | 047         | 26047 |

| Year | State | AA Code  | Assessment Area Name                      | County Name | State Code | County Code | FIPS  |
|------|-------|----------|-------------------------------------------|-------------|------------|-------------|-------|
| 2025 | MI    | 26-N0003 | Non-MSA Hillsdale County, MI              | Hillsdale   | 26         | 059         | 26059 |
| 2025 | MI    | 26-N0004 | Non-MSA Missaukee-Wexford Counties, MI    | Missaukee   | 26         | 113         | 26113 |
| 2025 | MI    | 26-N0004 | Non-MSA Missaukee-Wexford Counties, MI    | Wexford     | 26         | 165         | 26165 |
| 2025 | MI    | 26-N0005 | Non-MSA Antrim-Otsego Counties, MI        | Antrim      | 26         | 009         | 26009 |
| 2025 | MI    | 26-N0005 | Non-MSA Antrim-Otsego Counties, MI        | Otsego      | 26         | 137         | 26137 |
| 2025 | MI    | 26-N0006 | Non-MSA Shiawassee County, MI             | Shiawassee  | 26         | 155         | 26155 |
| 2025 | MI    | 26-N0007 | Non-MSA Counties - South MI               | Allegan     | 26         | 005         | 26005 |
| 2025 | MI    | 26-N0007 | Non-MSA Counties - South MI               | St Joseph   | 26         | 149         | 26149 |
| 2025 | MI    | 26-N0007 | Non-MSA Counties - South MI               | Van Buren   | 26         | 159         | 26159 |
| 2025 | NC    | 37-11700 | Asheville, NC                             | Buncombe    | 37         | 021         | 37021 |
| 2025 | NC    | 37-20500 | Durham, NC                                | Durham      | 37         | 063         | 37063 |
| 2025 | NC    | 37-20500 | Durham, NC                                | Orange      | 37         | 135         | 37135 |
| 2025 | NC    | 37-25860 | Hickory, NC                               | Catawba     | 37         | 035         | 37035 |
| 2025 | NC    | 37-39580 | Raleigh, NC                               | Wake        | 37         | 183         | 37183 |
| 2025 | NC    | 37-48900 | Wilmington, NC                            | New Hanover | 37         | 129         | 37129 |
| 2025 | NC    | 37-N0001 | Non-MSA Alleghany-Ashe Counties, NC       | Alleghany   | 37         | 005         | 37005 |
| 2025 | NC    | 37-N0001 | Non-MSA Alleghany-Ashe Counties, NC       | Ashe        | 37         | 009         | 37009 |
| 2025 | NC    | 37-N0002 | Non-MSA Avery County, NC                  | Avery       | 37         | 011         | 37011 |
| 2025 | NC    | 37-N0003 | Non-MSA Cleveland-Rutherford Counties, NC | Cleveland   | 37         | 045         | 37045 |
| 2025 | NC    | 37-N0003 | Non-MSA Cleveland-Rutherford Counties, NC | Rutherford  | 37         | 161         | 37161 |

| Year | State | AA Code  | Assessment Area Name            | County Name  | State Code | County Code | FIPS  |
|------|-------|----------|---------------------------------|--------------|------------|-------------|-------|
| 2025 | NC    | 37-N0004 | Non-MSA Transylvania County, NC | Transylvania | 37         | 175         | 37175 |
| 2025 | OH    | 39-10420 | Akron, OH                       | Portage      | 39         | 133         | 39133 |
| 2025 | OH    | 39-10420 | Akron, OH                       | Summit       | 39         | 153         | 39153 |
| 2025 | OH    | 39-15940 | Canton, OH                      | Stark        | 39         | 151         | 39151 |
| 2025 | OH    | 39-17410 | Cleveland, OH                   | Cuyahoga     | 39         | 035         | 39035 |
| 2025 | OH    | 39-17410 | Cleveland, OH                   | Geauga       | 39         | 055         | 39055 |
| 2025 | OH    | 39-17410 | Cleveland, OH                   | Lake         | 39         | 085         | 39085 |
| 2025 | OH    | 39-17410 | Cleveland, OH                   | Lorain       | 39         | 093         | 39093 |
| 2025 | OH    | 39-17410 | Cleveland, OH                   | Medina       | 39         | 103         | 39103 |
| 2025 | OH    | 39-18140 | Columbus, OH                    | Delaware     | 39         | 041         | 39041 |
| 2025 | OH    | 39-18140 | Columbus, OH                    | Fairfield    | 39         | 045         | 39045 |
| 2025 | OH    | 39-18140 | Columbus, OH                    | Franklin     | 39         | 049         | 39049 |
| 2025 | OH    | 39-18140 | Columbus, OH                    | Licking      | 39         | 089         | 39089 |
| 2025 | OH    | 39-18140 | Columbus, OH                    | Pickaway     | 39         | 129         | 39129 |
| 2025 | OH    | 39-18140 | Columbus, OH                    | Union        | 39         | 159         | 39159 |
| 2025 | OH    | 39-19430 | Dayton, OH                      | Greene       | 39         | 057         | 39057 |
| 2025 | OH    | 39-19430 | Dayton, OH                      | Miami        | 39         | 109         | 39109 |
| 2025 | OH    | 39-19430 | Dayton, OH                      | Montgomery   | 39         | 113         | 39113 |
| 2025 | OH    | 39-30620 | Lima, OH                        | Allen        | 39         | 003         | 39003 |
| 2025 | OH    | 39-41780 | Sandusky, OH                    | Erie         | 39         | 043         | 39043 |
| 2025 | OH    | 39-44220 | Springfield, OH                 | Clark        | 39         | 023         | 39023 |
| 2025 | OH    | 39-45780 | Toledo, OH                      | Fulton       | 39         | 051         | 39051 |

| Year | State | AA Code  | Assessment Area Name             | County Name | State Code | County Code | FIPS  |
|------|-------|----------|----------------------------------|-------------|------------|-------------|-------|
| 2025 | OH    | 39-45780 | Toledo, OH                       | Lucas       | 39         | 095         | 39095 |
| 2025 | OH    | 39-45780 | Toledo, OH                       | Wood        | 39         | 173         | 39173 |
| 2025 | OH    | 39-N0001 | Non-MSA Counties - North OH      | Hancock     | 39         | 063         | 39063 |
| 2025 | OH    | 39-N0001 | Non-MSA Counties - North OH      | Sandusky    | 39         | 143         | 39143 |
| 2025 | OH    | 39-N0001 | Non-MSA Counties - North OH      | Seneca      | 39         | 147         | 39147 |
| 2025 | OH    | 39-N0002 | Non-MSA Counties - North West OH | Auglaize    | 39         | 011         | 39011 |
| 2025 | OH    | 39-N0002 | Non-MSA Counties - North West OH | Champaign   | 39         | 021         | 39021 |
| 2025 | OH    | 39-N0002 | Non-MSA Counties - North West OH | Darke       | 39         | 037         | 39037 |
| 2025 | OH    | 39-N0002 | Non-MSA Counties - North West OH | Logan       | 39         | 091         | 39091 |
| 2025 | OH    | 39-N0002 | Non-MSA Counties - North West OH | Preble      | 39         | 135         | 39135 |
| 2025 | OH    | 39-N0002 | Non-MSA Counties - North West OH | Shelby      | 39         | 149         | 39149 |
| 2025 | OH    | 39-N0003 | Non-MSA Counties - South OH      | Adams       | 39         | 001         | 39001 |
| 2025 | OH    | 39-N0003 | Non-MSA Counties - South OH      | Clinton     | 39         | 027         | 39027 |
| 2025 | OH    | 39-N0003 | Non-MSA Counties - South OH      | Fayette     | 39         | 047         | 39047 |
| 2025 | OH    | 39-N0003 | Non-MSA Counties - South OH      | Highland    | 39         | 071         | 39071 |
| 2025 | OH    | 39-N0003 | Non-MSA Counties - South OH      | Ross        | 39         | 141         | 39141 |
| 2025 | OH    | 39-N0003 | Non-MSA Counties - South OH      | Scioto      | 39         | 145         | 39145 |
| 2025 | OH    | 39-N0004 | Non-MSA Defiance County, OH      | Defiance    | 39         | 039         | 39039 |
| 2025 | OH    | 39-N0005 | Non-MSA Marion County, OH        | Marion      | 39         | 101         | 39101 |
| 2025 | SC    | 45-16700 | Charleston, SC                   | Charleston  | 45         | 019         | 45019 |
| 2025 | SC    | 45-16700 | Charleston, SC                   | Dorchester  | 45         | 035         | 45035 |

| Year | State       | AA Code  | Assessment Area Name   | County Name | State Code | County Code | FIPS  |
|------|-------------|----------|------------------------|-------------|------------|-------------|-------|
| 2025 | SC          | 45-24860 | Greenville, SC         | Greenville  | 45         | 045         | 45045 |
| 2025 | SC          | 45-25940 | Hilton Head Island, SC | Beaufort    | 45         | 013         | 45013 |
| 2025 | SC          | 45-43900 | Spartanburg, SC        | Spartanburg | 45         | 083         | 45083 |
| 2025 | TN          | 47-28940 | Knoxville, TN          | Knox        | 47         | 093         | 47093 |
| 2025 | TN          | 47-34980 | Nashville, TN          | Davidson    | 47         | 037         | 47037 |
| 2025 | TN          | 47-34980 | Nashville, TN          | Maury       | 47         | 119         | 47119 |
| 2025 | TN          | 47-34980 | Nashville, TN          | Robertson   | 47         | 147         | 47147 |
| 2025 | TN          | 47-34980 | Nashville, TN          | Rutherford  | 47         | 149         | 47149 |
| 2025 | TN          | 47-34980 | Nashville, TN          | Sumner      | 47         | 165         | 47165 |
| 2025 | TN          | 47-34980 | Nashville, TN          | Williamson  | 47         | 187         | 47187 |
| 2025 | WV          | 54-16620 | Charleston, WV         | Kanawha     | 54         | 039         | 54039 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Cabarrus    | 37         | 025         | 37025 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Iredell     | 37         | 097         | 37097 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Lincoln     | 37         | 109         | 37109 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Mecklenburg | 37         | 119         | 37119 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Rowan       | 37         | 159         | 37159 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Union       | 37         | 179         | 37179 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | Lancaster   | 45         | 057         | 45057 |
| 2025 | Multi-State | 99-16740 | Charlotte, NC-SC       | York        | 45         | 091         | 45091 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN         | Cook        | 17         | 031         | 17031 |



| Year | State       | AA Code  | Assessment Area Name | County Name | State Code | County Code | FIPS  |
|------|-------------|----------|----------------------|-------------|------------|-------------|-------|
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | De Kalb     | 17         | 037         | 17037 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Du Page     | 17         | 043         | 17043 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Kane        | 17         | 089         | 17089 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | KENDALL     | 17         | 093         | 17093 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Lake        | 17         | 097         | 17097 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Mchenry     | 17         | 111         | 17111 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Will        | 17         | 197         | 17197 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Jasper      | 18         | 073         | 18073 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Lake        | 18         | 089         | 18089 |
| 2025 | Multi-State | 99-16980 | Chicago, IL-IN       | Porter      | 18         | 127         | 18127 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Dearborn    | 18         | 029         | 18029 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Boone       | 21         | 015         | 21015 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Campbell    | 21         | 037         | 21037 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Grant       | 21         | 081         | 21081 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Kenton      | 21         | 117         | 21117 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Pendleton   | 21         | 191         | 21191 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Brown       | 39         | 015         | 39015 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Butler      | 39         | 017         | 39017 |

| Year | State       | AA Code  | Assessment Area Name | County Name | State Code | County Code | FIPS  |
|------|-------------|----------|----------------------|-------------|------------|-------------|-------|
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Clermont    | 39         | 025         | 39025 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Hamilton    | 39         | 061         | 39061 |
| 2025 | Multi-State | 99-17140 | Cincinnati, OH-KY-IN | Warren      | 39         | 165         | 39165 |
| 2025 | Multi-State | 99-26580 | Huntington, WV-KY    | Boyd        | 21         | 019         | 21019 |
| 2025 | Multi-State | 99-26580 | Huntington, WV-KY    | Cabell      | 54         | 011         | 54011 |
| 2025 | Multi-State | 99-26580 | Huntington, WV-KY    | Putnam      | 54         | 079         | 54079 |
| 2025 | Multi-State | 99-26580 | Huntington, WV-KY    | Wayne       | 54         | 099         | 54099 |
| 2025 | Multi-State | 99-31140 | Louisville, KY-IN    | Clark       | 18         | 019         | 18019 |
| 2025 | Multi-State | 99-31140 | Louisville, KY-IN    | Floyd       | 18         | 043         | 18043 |
| 2025 | Multi-State | 99-31140 | Louisville, KY-IN    | Jefferson   | 21         | 111         | 21111 |
| 2025 | Multi-State | 99-31140 | Louisville, KY-IN    | Oldham      | 21         | 185         | 21185 |
| 2025 | Multi-State | 99-31140 | Louisville, KY-IN    | Shelby      | 21         | 211         | 21211 |
| 2025 | Multi-State | 99-43780 | South Bend, IN-MI    | St Joseph   | 18         | 141         | 18141 |
| 2025 | Multi-State | 99-43780 | South Bend, IN-MI    | Cass        | 26         | 027         | 26027 |
| 2025 | FL          | 12-38940 | Port St. Lucie, FL   | St. Lucie   | 12         | 111         | 12111 |
| 2025 | AL          | 1-26620  | Huntsville, AL       | Madison     | 01         | 089         | 01089 |
| 2025 | GA          | 13-12060 | Atlanta, GA          | Cherokee    | 13         | 057         | 13057 |
| 2025 | SC          | 45-16700 | Charleston, SC       | Berkeley    | 45         | 015         | 45015 |

**Comerica Bank**  
**CRA Assessment Areas**

**Arizona**

1. Phoenix (Maricopa County)

**California**

1. Greater Los Angeles (Los Angeles and Orange counties)
2. Inland Empire (Riverside and San Bernardino counties)
3. Salinas (Monterey County)
4. San Diego (San Diego County)
5. San Francisco Bay (Alameda, Contra Costa, San Francisco, and San Mateo counties)
6. San Jose (Santa Clara County)
7. Santa Cruz (Santa Cruz County)
8. Ventura County (Ventura County)

**Florida**

1. Fort Lauderdale-West Palm Beach (Broward and Palm Beach counties)
2. Naples (Collier County): Comerica Bank plans to exit January 1, 2026 (pending annual assessment area review with key business partners). Last banking center closed in 2025.

**Michigan**

1. Ann Arbor (Washtenaw County)
2. Battle Creek (Calhoun County)
3. Fenton (Genesee County): Comerica Bank plans to exit January 1, 2026 (pending annual assessment area review with key business partners). Last banking center closed in 2025.
3. Grand Rapids (Kent County): Comerica Bank exited Ottawa County effective January 1, 2025
4. Jackson (Jackson County)
5. Kalamazoo-Portage (Kalamazoo County)
6. Lansing-East Lansing (Clinton, Eaton, Ingham counties)
7. Lenawee County (Lenawee County): Comerica Bank plans to exit January 1, 2026 (pending annual assessment area review with key business partners). Last banking center closed in 2025.

8. Midland (Midland County)
9. Muskegon (Muskegon County)
10. Southeast Michigan (Wayne, Livingston, Macomb, and Oakland counties): Comerica Bank exited Lapeer County effective January 1, 2024

## **Texas**

1. Austin (Travis and Williamson counties)
2. Bank of the Hills (Kerr County)
3. Dallas-Fort Worth Metroplex (Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties): Comerica Bank plans to exit Ellis County on January 1, 2026 (pending annual assessment area review with key business partners). Last banking center closed in 2025.
4. Houston (Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties)
5. San Antonio (Bexar and Kendall counties)

**Public Exhibit 11**

**List of Fifth Third Bank Main Office and Branches**

## **Branches of Fifth Third and Fifth Third Bank**

### **Current Fifth Third Bank Branches<sup>1</sup>**

| Name                     | Address                     | County               | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------|-----------------------------|----------------------|------------------|-------|----------|----------------|--------------------------|
| Mid City BC              | 5901-B University Dr NW     | Madison County, AL   | Huntsville       | AL    | 35806    | Brick & Mortar | 2 - Moderate Income      |
| 45399 Millhopper BC      | 4100 NW 16th Blvd           | Alachua County, FL   | Gainesville      | FL    | 32605    | Brick & Mortar | 4 - Upper Income         |
| Addison Village BC       | 7695 Stadium Parkway        | Brevard County, FL   | Melbourne        | FL    | 32940    | Brick & Mortar | 4 - Upper Income         |
| West Melbourne BC        | 3035 W. New Haven Ave.      | Brevard County, FL   | Melbourne        | FL    | 32904    | Brick & Mortar | 4 - Upper Income         |
| Flamingo Pines BC        | 50 S Flamingo Road          | Broward County, FL   | Pembroke Pines   | FL    | 33027    | Brick & Mortar | 1 - Low Income           |
| Tamarac BC               | 5815 N University Dr        | Broward County, FL   | Tamarac          | FL    | 33321    | Brick & Mortar | 2 - Moderate Income      |
| Coral Springs BC         | 2525 N. University Dr.      | Broward County, FL   | Coral Springs    | FL    | 33065    | Brick & Mortar | 2 - Moderate Income      |
| 43328 College Plaza BC   | 199 North University Drive  | Broward County, FL   | Pembroke Pines   | FL    | 33024    | Brick & Mortar | 3 - Middle Income        |
| 02884 Fort Lauderdale BC | 200 East Las Olas Boulevard | Broward County, FL   | Fort Lauderdale  | FL    | 33301    | Brick & Mortar | 4 - Upper Income         |
| 43331 Miramar Square BC  | 12336 Miramar Parkway       | Broward County, FL   | Miramar          | FL    | 33025    | Brick & Mortar | 4 - Upper Income         |
| Lighthouse Point BC      | 3800 N. Federal Highway     | Broward County, FL   | Lighthouse Point | FL    | 33064    | Brick & Mortar | 4 - Upper Income         |
| Harbordale BC            | 808 SE 17th Street          | Broward County, FL   | Fort Lauderdale  | FL    | 33316    | Brick & Mortar | 4 - Upper Income         |
| 01353 Kings Highway BC   | 1910 Kings Highway          | Charlotte County, FL | Port Charlotte   | FL    | 33980    | Brick & Mortar | 3 - Middle Income        |
| 43324 Englewood BC       | 1550 Placida Road           | Charlotte County, FL | Englewood        | FL    | 34223    | Brick & Mortar | 4 - Upper Income         |
| Babcock Ranch BC         | 42031 Cypress Parkway       | Charlotte County, FL | Babcock Ranch    | FL    | 33982    | Brick & Mortar | 4 - Upper Income         |
| 45307 Fleming Island BC  | 5000-70 US Highway 17 South | Clay County, FL      | Orange Park      | FL    | 32003    | Brick & Mortar | 4 - Upper Income         |

<sup>1</sup> List excludes foreign branch located on 70 York Street, Toronto, Ontario, Canada.

| Name                                  | Address                         | County             | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------------------|---------------------------------|--------------------|--------------|-------|----------|----------------|--------------------------|
| 02886 Golden Gate BC                  | 4794 Golden Gate Parkway        | Collier County, FL | Naples       | FL    | 34116    | Brick & Mortar | 2 - Moderate Income      |
| Gulfgate Plaza BC                     | 2898 Tamiami Trail E            | Collier County, FL | Naples       | FL    | 34112    | Brick & Mortar | 2 - Moderate Income      |
| 00343 Berkshire BC                    | 3775 Santa Barbara Boulevard    | Collier County, FL | Naples       | FL    | 34104    | Brick & Mortar | 3 - Middle Income        |
| 00347 Lely BC                         | 95 Price Street                 | Collier County, FL | Naples       | FL    | 34113    | Brick & Mortar | 3 - Middle Income        |
| 02867 Fountain Park BC                | 7925 Airport Pulling Road North | Collier County, FL | Naples       | FL    | 34109    | Brick & Mortar | 3 - Middle Income        |
| 02900 East Trail BC                   | 4570 Thomasson Lane             | Collier County, FL | Naples       | FL    | 34112    | Brick & Mortar | 3 - Middle Income        |
| 05063 Mission Hills BC                | 7595 Vanderbilt Beach Road      | Collier County, FL | Naples       | FL    | 34119    | Brick & Mortar | 3 - Middle Income        |
| North Naples BC                       | 1477 Immokalee Road             | Collier County, FL | Naples       | FL    | 34110    | Brick & Mortar | 3 - Middle Income        |
| 00344 Naples Garden BC                | 2100 Tamiami Trail N            | Collier County, FL | Naples       | FL    | 34102    | Brick & Mortar | 4 - Upper Income         |
| 00346 Carillon Place BC               | 5076 Airport Pulling Road North | Collier County, FL | Naples       | FL    | 34105    | Brick & Mortar | 4 - Upper Income         |
| 00353 Pelican Strand BC               | 5636 Tavilla Circle             | Collier County, FL | Naples       | FL    | 34110    | Brick & Mortar | 4 - Upper Income         |
| Naples Fifth Avenue BC                | 428 9th Street South            | Collier County, FL | Naples       | FL    | 34102    | Brick & Mortar | 4 - Upper Income         |
| 02866 Pelican Bay BC                  | 8771 Tamiami Trail North        | Collier County, FL | Naples       | FL    | 34108    | Brick & Mortar | 4 - Upper Income         |
| 03000 Marco Island BC                 | 650 Elkcarn Circle              | Collier County, FL | Marco Island | FL    | 34145    | Brick & Mortar | 4 - Upper Income         |
| 43306 Gateway Shoppes at North Bay BC | 13575 Tamiami Trail North       | Collier County, FL | Naples       | FL    | 34110    | Brick & Mortar | 4 - Upper Income         |
| Park Shore Plaza BC                   | 4395 Tamiami Trail North        | Collier County, FL | Naples       | FL    | 34103    | Brick & Mortar | 4 - Upper Income         |
| 45301 103rd St BC                     | 6703 103rd Street               | Duval County, FL   | Jacksonville | FL    | 32210    | Brick & Mortar | 2 - Moderate Income      |
| 45302 Lakewood BC                     | 3642 University Boulevard West  | Duval County, FL   | Jacksonville | FL    | 32217    | Brick & Mortar | 2 - Moderate Income      |
| 45304 Merrill Road BC                 | 9125 Merrill Road               | Duval County, FL   | Jacksonville | FL    | 32225    | Brick & Mortar | 2 - Moderate Income      |
| 45325 Regency BC                      | 9245 Atlantic Boulevard         | Duval County, FL   | Jacksonville | FL    | 32225    | Brick & Mortar | 2 - Moderate Income      |

| Name                             | Address                                    | County                  | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|----------------------------------|--------------------------------------------|-------------------------|--------------|-------|----------|----------------|--------------------------|
| 45328 Lem Turner and Edgewood BC | 7753 Lem Turner Road                       | Duval County, FL        | Jacksonville | FL    | 32208    | Brick & Mortar | 2 - Moderate Income      |
| Saint Johns Town Center BC       | 4489 Town Center Parkway                   | Duval County, FL        | Jacksonville | FL    | 32246    | Brick & Mortar | 2 - Moderate Income      |
| 45303 Loretto Road BC            | 11683 San Jose Boulevard                   | Duval County, FL        | Jacksonville | FL    | 32223    | Brick & Mortar | 3 - Middle Income        |
| 45313 Kenan BC                   | 12608 Beach Blvd.                          | Duval County, FL        | Jacksonville | FL    | 32246    | Brick & Mortar | 4 - Upper Income         |
| eTown BC                         | 11332 Apex Trail                           | Duval County, FL        | Jacksonville | FL    | 32256    | Brick & Mortar | 4 - Upper Income         |
| 42320 Hyde Park FL BC            | 1901 West Swann Avenue                     | Hillsborough County, FL | Tampa        | FL    | 33606    | Brick & Mortar | 0 - Income Not Available |
| 42375 East Tampa BC              | 2602 East Hillsborough Avenue              | Hillsborough County, FL | Tampa        | FL    | 33610    | Brick & Mortar | 1 - Low Income           |
| 42378 Lee Roy Selmon BC          | 2206 East Fowler Avenue                    | Hillsborough County, FL | Tampa        | FL    | 33612    | Brick & Mortar | 1 - Low Income           |
| 42328 Channelside BC             | 2001 Adamo Drive                           | Hillsborough County, FL | Tampa        | FL    | 33605    | Brick & Mortar | 2 - Moderate Income      |
| 42330 Seffner BC                 | 11710 Martin Luther King Jr Boulevard East | Hillsborough County, FL | Seffner      | FL    | 33584    | Brick & Mortar | 2 - Moderate Income      |
| 42380 Anderson Road BC           | 12002 Anderson Road                        | Hillsborough County, FL | Tampa        | FL    | 33625    | Brick & Mortar | 2 - Moderate Income      |
| 42321 West Tampa BC              | 3411 West Columbus Drive                   | Hillsborough County, FL | Tampa        | FL    | 33607    | Brick & Mortar | 3 - Middle Income        |
| 42341 Countryway BC              | 12181 West Hillsborough Avenue             | Hillsborough County, FL | Tampa        | FL    | 33635    | Brick & Mortar | 3 - Middle Income        |
| 42343 Carrollwood BC             | 13001 North Dale Mabry Highway             | Hillsborough County, FL | Tampa        | FL    | 33618    | Brick & Mortar | 3 - Middle Income        |
| Gandy Blvd BC                    | 4319 W Gandy Blvd                          | Hillsborough County, FL | Tampa        | FL    | 33611    | Brick & Mortar | 3 - Middle Income        |
| Brandon Boulevard BC             | 1909 Highway 60 East                       | Hillsborough County, FL | Valrico      | FL    | 33594    | Brick & Mortar | 3 - Middle Income        |
| West Bloomingdale BC             | 10260 Bloomingdale Ave                     | Hillsborough County, FL | Riverview    | FL    | 33578    | Brick & Mortar | 3 - Middle Income        |
| 42323 Westchase BC               | 9450 West Linebaugh Avenue                 | Hillsborough County, FL | Tampa        | FL    | 33626    | Brick & Mortar | 4 - Upper Income         |



| Name                        | Address                          | County                  | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-----------------------------|----------------------------------|-------------------------|----------------|-------|----------|----------------|--------------------------|
| 42332 Tampa Main BC         | 201 East Kennedy Boulevard       | Hillsborough County, FL | Tampa          | FL    | 33602    | Brick & Mortar | 4 - Upper Income         |
| South Tampa BC              | 614 S Dale Mabry Hwy             | Hillsborough County, FL | Tampa          | FL    | 33609    | Brick & Mortar | 4 - Upper Income         |
| 42311 Big Bend BC           | 13304 US Highway 301 South       | Hillsborough County, FL | Riverview      | FL    | 33578    | Brick & Mortar | 4 - Upper Income         |
| 42329 Ruskin BC             | 1020 North US Highway 41         | Hillsborough County, FL | Ruskin         | FL    | 33570    | Brick & Mortar | 4 - Upper Income         |
| 42331 Valrico BC            | 3402 Lithia Pinecrest Road       | Hillsborough County, FL | Valrico        | FL    | 33596    | Brick & Mortar | 4 - Upper Income         |
| 44395 Clermont BC           | 1350 Roper Boulevard             | Lake County, FL         | Clermont       | FL    | 34711    | Brick & Mortar | 4 - Upper Income         |
| Plaza Collina BC            | 4619 Collina Terrace             | Lake County, FL         | Clermont       | FL    | 34711    | Brick & Mortar | 4 - Upper Income         |
| 04377 Healthpark BC         | 9000 Park Royal Drive            | Lee County, FL          | Fort Myers     | FL    | 33908    | Brick & Mortar | 0 - Income Not Available |
| 01333 Hancock BC            | 114 Hancock Bridge Parkway West  | Lee County, FL          | Cape Coral     | FL    | 33991    | Brick & Mortar | 2 - Moderate Income      |
| 02861 Colonial Boulevard BC | 2915 Colonial Boulevard          | Lee County, FL          | Fort Myers     | FL    | 33966    | Brick & Mortar | 2 - Moderate Income      |
| 02935 Crossroads FL BC      | 11511 SR 82                      | Lee County, FL          | Fort Myers     | FL    | 33913    | Brick & Mortar | 2 - Moderate Income      |
| 00218 Daniels BC            | 13350 Metro Parkway              | Lee County, FL          | Fort Myers     | FL    | 33966    | Brick & Mortar | 3 - Middle Income        |
| 02187 Del Prado BC          | 2724 Del Prado Boulevard South   | Lee County, FL          | Cape Coral     | FL    | 33904    | Brick & Mortar | 3 - Middle Income        |
| 02857 Pine Island Road BC   | 1801 North East Pine Island Road | Lee County, FL          | Cape Coral     | FL    | 33909    | Brick & Mortar | 3 - Middle Income        |
| 02862 Jamaica Bay BC        | 15221 Tamiami Trail              | Lee County, FL          | Fort Myers     | FL    | 33908    | Brick & Mortar | 3 - Middle Income        |
| 02870 Bonita Bay BC         | 8800 West Terry Street           | Lee County, FL          | Bonita Springs | FL    | 34135    | Brick & Mortar | 3 - Middle Income        |
| 02912 Parkway East BC       | 1600 Cape Coral Parkway East     | Lee County, FL          | Cape Coral     | FL    | 33904    | Brick & Mortar | 3 - Middle Income        |
| 06227 Estero BC             | 21321 South Tamiami Trail        | Lee County, FL          | Estero         | FL    | 33928    | Brick & Mortar | 3 - Middle Income        |
| Camelot Isles BC            | 1522 Cape Coral Parkway West     | Lee County, FL          | Cape Coral     | FL    | 33914    | Brick & Mortar | 3 - Middle Income        |

| Name                        | Address                          | County             | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-----------------------------|----------------------------------|--------------------|----------------|-------|----------|----------------|--------------------------|
| Majestic Palms BC           | 11550 Majestic Palms Boulevard   | Lee County, FL     | Fort Myers     | FL    | 33908    | Brick & Mortar | 3 - Middle Income        |
| 00350 Bonita BC             | 9021 Bonita Beach Road Southeast | Lee County, FL     | Bonita Springs | FL    | 34135    | Brick & Mortar | 4 - Upper Income         |
| 01331 Treeline BC           | 13581 Goldenwood Drive           | Lee County, FL     | Fort Myers     | FL    | 33913    | Brick & Mortar | 4 - Upper Income         |
| 43303 Surfside BC           | 2402 Surfside Boulevard          | Lee County, FL     | Cape Coral     | FL    | 33991    | Brick & Mortar | 4 - Upper Income         |
| Corkscrew BC                | 10880 Miromar Outlet Drive       | Lee County, FL     | Estero         | FL    | 33928    | Brick & Mortar | 4 - Upper Income         |
| 43345 Bonita Grande BC      | 12971 Bonita Beach Road SE       | Lee County, FL     | Bonita Springs | FL    | 34135    | Brick & Mortar | 4 - Upper Income         |
| College Parkway BC          | 9041 College Parkway             | Lee County, FL     | Fort Myers     | FL    | 33919    | Brick & Mortar | 3 - Middle Income        |
| Bayshore Gardens BC         | 5942 14th Street West            | Manatee County, FL | Bradenton      | FL    | 34207    | Brick & Mortar | 2 - Moderate Income      |
| 43361 Palmetto BC           | 602 10th Street East             | Manatee County, FL | Palmetto       | FL    | 34221    | Brick & Mortar | 2 - Moderate Income      |
| 43304 Braden River Plaza BC | 4630 East State Road 64          | Manatee County, FL | Bradenton      | FL    | 34208    | Brick & Mortar | 3 - Middle Income        |
| 43355 66th and Cortez BC    | 6550 Cortez Road West            | Manatee County, FL | Bradenton      | FL    | 34210    | Brick & Mortar | 3 - Middle Income        |
| Manatee BC                  | 6601 Manatee Avenue West         | Manatee County, FL | Bradenton      | FL    | 34209    | Brick & Mortar | 3 - Middle Income        |
| Lockwood Ridge BC           | 5441 45th Street East            | Manatee County, FL | Bradenton      | FL    | 34203    | Brick & Mortar | 3 - Middle Income        |
| 01164 Lakewood Ranch BC     | 11141 East State Road 70         | Manatee County, FL | Bradenton      | FL    | 34202    | Brick & Mortar | 4 - Upper Income         |
| 43315 SR 301 and Chin BC    | 11215 US 301 North               | Manatee County, FL | Parrish        | FL    | 34219    | Brick & Mortar | 4 - Upper Income         |
| White Eagle BC              | 13040 SR 64 E                    | Manatee County, FL | Bradenton      | FL    | 34212    | Brick & Mortar | 4 - Upper Income         |
| Moccasin Wallow BC          | 11605 Moccasin Wallow Road       | Manatee County, FL | Parrish        | FL    | 34219    | Brick & Mortar | 4 - Upper Income         |
| Ocala Central BC            | 2650 SW College Rd.              | Marion County, FL  | Ocala          | FL    | 34471    | Brick & Mortar | 3 - Middle Income        |
| Foxwood BC                  | 2605 NW 46th Terrace             | Marion County, FL  | Ocala          | FL    | 34482    | Brick & Mortar | 3 - Middle Income        |

| Name                         | Address                          | County            | City          | State | Zip Code | Service Type   | Census Tract Income 2024 |
|------------------------------|----------------------------------|-------------------|---------------|-------|----------|----------------|--------------------------|
| 44428 Top of the World BC    | 8253 Southwest Hwy 200           | Ocala County, FL  | Ocala         | FL    | 34481    | Brick & Mortar | 3 - Middle Income        |
| 44357 Goldenrod BC           | 7360 University Boulevard        | Orange County, FL | Winter Park   | FL    | 32792    | Brick & Mortar | 0 - Income Not Available |
| 44321 South Semoran BC       | 5351 South Semoran Boulevard     | Orange County, FL | Orlando       | FL    | 32822    | Brick & Mortar | 1 - Low Income           |
| 44314 Sand Lake BC           | 2324 Sand Lake Road              | Orange County, FL | Orlando       | FL    | 32809    | Brick & Mortar | 2 - Moderate Income      |
| 44342 Turkey Lake BC         | 6735 Conroy Windermere Road      | Orange County, FL | Orlando       | FL    | 32835    | Brick & Mortar | 2 - Moderate Income      |
| 44338 Wekiva Springs BC      | 1725 South Orange Blossom Trail  | Orange County, FL | Apopka        | FL    | 32703    | Brick & Mortar | 2 - Moderate Income      |
| 44370 Lockwood Crossings BC  | 16860 East Colonial Drive        | Orange County, FL | Orlando       | FL    | 32820    | Brick & Mortar | 2 - Moderate Income      |
| 44301 Lee Road BC            | 1401 Lee Road                    | Orange County, FL | Orlando       | FL    | 32810    | Brick & Mortar | 2 - Moderate Income      |
| 44398 Southchase BC          | 13043 South Orange Blossom Trail | Orange County, FL | Orlando       | FL    | 32837    | Brick & Mortar | 2 - Moderate Income      |
| 44407 SODO BC                | 2394 South Orange Avenue         | Orange County, FL | Orlando       | FL    | 32806    | Brick & Mortar | 3 - Middle Income        |
| 44397 Ocoee BC               | 121 North Clarke Road            | Orange County, FL | Ocoee         | FL    | 34761    | Brick & Mortar | 3 - Middle Income        |
| 44339 Rock Springs BC        | 1495 North Rock Springs Road     | Orange County, FL | Apopka        | FL    | 32712    | Brick & Mortar | 3 - Middle Income        |
| Windermere BC                | 9168 Conroy Windermere Rd        | Orange County, FL | Windermere    | FL    | 34786    | Brick & Mortar | 4 - Upper Income         |
| 44327 Dr Phillips BC         | 8075 Via Dellagio Way            | Orange County, FL | Orlando       | FL    | 32819    | Brick & Mortar | 4 - Upper Income         |
| 44330 The Groves BC          | 3004 Daniels Road                | Orange County, FL | Winter Garden | FL    | 34787    | Brick & Mortar | 4 - Upper Income         |
| 44348 Moore and Maguire BC   | 2900 Maguire Road                | Orange County, FL | Ocoee         | FL    | 34761    | Brick & Mortar | 4 - Upper Income         |
| 44316 University and Dean BC | 9991 University Boulevard        | Orange County, FL | Orlando       | FL    | 32817    | Brick & Mortar | 4 - Upper Income         |
| 44366 South Alafaya BC       | 11501 Curry Ford Road            | Orange County, FL | Orlando       | FL    | 32825    | Brick & Mortar | 4 - Upper Income         |
| 44304 Maitland BC            | 100 South Orlando Avenue         | Orange County, FL | Maitland      | FL    | 32751    | Brick & Mortar | 4 - Upper Income         |

| Name                         | Address                                 | County                | City               | State | Zip Code | Service Type   | Census Tract Income 2024 |
|------------------------------|-----------------------------------------|-----------------------|--------------------|-------|----------|----------------|--------------------------|
| 44315 Lake Eola BC           | 200 East Robinson Street                | Orange County, FL     | Orlando            | FL    | 32801    | Brick & Mortar | 4 - Upper Income         |
| 44324 Lee Vista BC           | 8600 Lee Vista Boulevard                | Orange County, FL     | Orlando            | FL    | 32829    | Brick & Mortar | 4 - Upper Income         |
| Lake Nona BC                 | 11915 Narcoossee Road                   | Orange County, FL     | Orlando            | FL    | 32832    | Brick & Mortar | 4 - Upper Income         |
| 44347 Westside BC            | 9020 West Irlo Bronson Memorial Highway | Osceola County, FL    | Kissimmee          | FL    | 34747    | Brick & Mortar | 3 - Middle Income        |
| 44386 Bellalago BC           | 3801 Pleasant Hill Road                 | Osceola County, FL    | Kissimmee          | FL    | 34746    | Brick & Mortar | 3 - Middle Income        |
| 44390 Boggy Creek BC         | 1401 Simpson Road                       | Osceola County, FL    | Kissimmee          | FL    | 34744    | Brick & Mortar | 3 - Middle Income        |
| 43425 Westlake BC            | 16725 Persimmon Blvd                    | Palm Beach County, FL | Westlake           | FL    | 33470    | Brick & Mortar | 0 - Income Not Available |
| 02903 West Palm Beach BC     | 515 North Flagler Drive                 | Palm Beach County, FL | West Palm Beach    | FL    | 33401    | Brick & Mortar | 2 - Moderate Income      |
| 43325 Lake Worth BC          | 6651 Lake Worth Road                    | Palm Beach County, FL | Lake Worth         | FL    | 33467    | Brick & Mortar | 2 - Moderate Income      |
| Jupiter BC                   | 6736 West Indiantown Road               | Palm Beach County, FL | Jupiter            | FL    | 33458    | Brick & Mortar | 2 - Moderate Income      |
| North Congress BC            | 600 North Congress Ave.                 | Palm Beach County, FL | Boynton Beach      | FL    | 33426    | Brick & Mortar | 2 - Moderate Income      |
| Delray Landing BC            | 5090 W Atlantic Avenue                  | Palm Beach County, FL | Delray Beach       | FL    | 33484    | Brick & Mortar | 3 - Middle Income        |
| Lantana BC                   | 1189 W Lantana Rd                       | Palm Beach County, FL | Lantana            | FL    | 33462    | Brick & Mortar | 3 - Middle Income        |
| Hypoluxo BC                  | 4681 Hypoluxo Rd                        | Palm Beach County, FL | Lake Worth         | FL    | 33463    | Brick & Mortar | 3 - Middle Income        |
| 43327 9035 LaFontana Blvd BC | 9035 LaFontana Boulevard                | Palm Beach County, FL | Boca Raton         | FL    | 33434    | Brick & Mortar | 3 - Middle Income        |
| Northlake FL BC              | 3305 Northlake Blvd                     | Palm Beach County, FL | Palm Beach Gardens | FL    | 33403    | Brick & Mortar | 3 - Middle Income        |
| 02885 Palmetto Park BC       | 120 East Palmetto Park Road             | Palm Beach County, FL | Boca Raton         | FL    | 33432    | Brick & Mortar | 4 - Upper Income         |
| Boca Garden Shops BC         | 7028 W Palmetto Park Rd                 | Palm Beach County, FL | Boca Raton         | FL    | 33433    | Brick & Mortar | 4 - Upper Income         |
| Boynton Beach BC             | 10891 South Jog Road                    | Palm Beach County, FL | Boynton Beach      | FL    | 33437    | Brick & Mortar | 4 - Upper Income         |

| Name                     | Address                      | County                | City               | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------|------------------------------|-----------------------|--------------------|-------|----------|----------------|--------------------------|
| North Palm Beach BC      | 11364 US 1                   | Palm Beach County, FL | Palm Beach Gardens | FL    | 33408    | Brick & Mortar | 4 - Upper Income         |
| East Wellington BC       | 900 State Road 7             | Palm Beach County, FL | Wellington         | FL    | 33411    | Brick & Mortar | 4 - Upper Income         |
| 42340 New Port Richey BC | 5425 State Route 54          | Pasco County, FL      | New Port Richey    | FL    | 34652    | Brick & Mortar | 2 - Moderate Income      |
| 42369 Holiday BC         | 4714 Mile Stretch Drive      | Pasco County, FL      | Holiday            | FL    | 34690    | Brick & Mortar | 2 - Moderate Income      |
| 42366 Bayonet Point BC   | 12231 US Highway 19          | Pasco County, FL      | Bayonet Point      | FL    | 34667    | Brick & Mortar | 3 - Middle Income        |
| 42345 Wiregrass BC       | 2022 Bruce B Downs Boulevard | Pasco County, FL      | Wesley Chapel      | FL    | 33544    | Brick & Mortar | 4 - Upper Income         |
| Starkey Ranch BC         | 13474 Pine Gap Spur          | Pasco County, FL      | Odessa             | FL    | 33556    | Brick & Mortar | 4 - Upper Income         |
| Collier Commons BC       | 22850 SR 54                  | Pasco County, FL      | Lutz               | FL    | 33549    | Brick & Mortar | 4 - Upper Income         |
| Sunlake BC               | 18710 State Road 54          | Pasco County, FL      | Lutz               | FL    | 33558    | Brick & Mortar | 4 - Upper Income         |
| 42301 Cleveland St BC    | 1150 Cleveland Street        | Pinellas County, FL   | Clearwater         | FL    | 33755    | Brick & Mortar | 0 - Income Not Available |
| 42367 Missouri Ave BC    | 1698 Missouri Avenue         | Pinellas County, FL   | Clearwater         | FL    | 33756    | Brick & Mortar | 1 - Low Income           |
| 42317 Largo BC           | 11281 Ulmerton Road          | Pinellas County, FL   | Largo              | FL    | 33778    | Brick & Mortar | 2 - Moderate Income      |
| East Bay BC              | 4875 East Bay Drive          | Pinellas County, FL   | Clearwater         | FL    | 33764    | Brick & Mortar | 2 - Moderate Income      |
| 42302 49th Street BC     | 13361 49th Street North      | Pinellas County, FL   | Clearwater         | FL    | 33762    | Brick & Mortar | 3 - Middle Income        |
| Countryside FL BC        | 2508 State Road 580          | Pinellas County, FL   | Clearwater         | FL    | 33761    | Brick & Mortar | 3 - Middle Income        |
| 42306 East Lake BC       | 1100 East Lake Road          | Pinellas County, FL   | Palm Harbor        | FL    | 34685    | Brick & Mortar | 3 - Middle Income        |
| 42307 Indian Rocks Rd BC | 12360 Indian Rocks Road      | Pinellas County, FL   | Largo              | FL    | 33774    | Brick & Mortar | 3 - Middle Income        |
| 42310 Park Boulevard BC  | 10899 Park Boulevard         | Pinellas County, FL   | Seminole           | FL    | 33772    | Brick & Mortar | 3 - Middle Income        |
| 42338 Pinellas Park BC   | 7770 66th Street             | Pinellas County, FL   | Pinellas Park      | FL    | 33781    | Brick & Mortar | 3 - Middle Income        |

| Name                           | Address                       | County              | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------|-------------------------------|---------------------|------------------|-------|----------|----------------|--------------------------|
| 42358 Gulf to Bay BC           | 2710 Gulf to Bay Boulevard    | Pinellas County, FL | Clearwater       | FL    | 33759    | Brick & Mortar | 3 - Middle Income        |
| Belleair Bluffs BC             | 2501 W Bay Drive              | Pinellas County, FL | Largo            | FL    | 33770    | Brick & Mortar | 3 - Middle Income        |
| 42308 Tyrone BC                | 2201 66th Street North        | Pinellas County, FL | Saint Petersburg | FL    | 33710    | Brick & Mortar | 3 - Middle Income        |
| Northeast Park BC              | 3901 4th St N                 | Pinellas County, FL | Saint Petersburg | FL    | 33703    | Brick & Mortar | 3 - Middle Income        |
| 42305 Island Estates BC        | 100 Island Way                | Pinellas County, FL | Clearwater       | FL    | 33767    | Brick & Mortar | 4 - Upper Income         |
| 42313 Indian Shores BC         | 18395 Gulf Boulevard          | Pinellas County, FL | Indian Shores    | FL    | 33785    | Brick & Mortar | 4 - Upper Income         |
| 42316 Palm Harbor BC           | 1027 Nebraska Avenue          | Pinellas County, FL | Palm Harbor      | FL    | 34683    | Brick & Mortar | 4 - Upper Income         |
| Enterprise BC                  | 3029 Enterprise Road East     | Pinellas County, FL | Clearwater       | FL    | 33759    | Brick & Mortar | 4 - Upper Income         |
| Skyway Marina BC               | 4301 34th Street S            | Pinellas County, FL | Saint Petersburg | FL    | 33711    | Brick & Mortar | 4 - Upper Income         |
| 42315 Treasure Island BC       | 180 Treasure Island Causeway  | Pinellas County, FL | Treasure Island  | FL    | 33706    | Brick & Mortar | 4 - Upper Income         |
| 42370 Combee BC                | 435 South Combee Road         | Polk County, FL     | Lakeland         | FL    | 33801    | Brick & Mortar | 2 - Moderate Income      |
| 42371 Lakeland Hills BC        | 4012 Lakeland Hills Boulevard | Polk County, FL     | Lakeland         | FL    | 33805    | Brick & Mortar | 2 - Moderate Income      |
| 42374 S Florida Ave BC         | 4421 South Florida Avenue     | Polk County, FL     | Lakeland         | FL    | 33813    | Brick & Mortar | 2 - Moderate Income      |
| Wellen Park BC                 | 12202 Mercado Drive           | Sarasota County, FL | Venice           | FL    | 34293    | Brick & Mortar | 3 - Middle Income        |
| 01132 University and Tuttle BC | 6265 North Tuttle Avenue      | Sarasota County, FL | Sarasota         | FL    | 34243    | Brick & Mortar | 3 - Middle Income        |
| 02873 Cattlemen Road BC        | 2035 Cattlemen Road           | Sarasota County, FL | Sarasota         | FL    | 34232    | Brick & Mortar | 3 - Middle Income        |
| 02874 North Port BC            | 18120 Tamiami Trail           | Sarasota County, FL | North Port       | FL    | 34287    | Brick & Mortar | 3 - Middle Income        |
| 02876 East Venice BC           | 1340 East Venice Avenue       | Sarasota County, FL | Venice           | FL    | 34285    | Brick & Mortar | 3 - Middle Income        |
| 02878 Jacaranda BC             | 1641 Jacaranda Boulevard      | Sarasota County, FL | Venice           | FL    | 34293    | Brick & Mortar | 3 - Middle Income        |
| 43308 Stickney Point BC        | 6620 South Tamiami Trail      | Sarasota County, FL | Sarasota         | FL    | 34231    | Brick & Mortar | 3 - Middle Income        |

| Name                        | Address                    | County               | City              | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-----------------------------|----------------------------|----------------------|-------------------|-------|----------|----------------|--------------------------|
| 43353 Bee Ridge BC          | 3740 Bee Ridge Road        | Sarasota County, FL  | Sarasota          | FL    | 34233    | Brick & Mortar | 3 - Middle Income        |
| Palmer Ranch BC             | 8500 S Tamiami Trail       | Sarasota County, FL  | Sarasota          | FL    | 34238    | Brick & Mortar | 3 - Middle Income        |
| 43348 Five Points BC        | 50 Central Avenue          | Sarasota County, FL  | Sarasota          | FL    | 34236    | Brick & Mortar | 4 - Upper Income         |
| 43358 The Landings BC       | 4902 S. Tamiami Trail      | Sarasota County, FL  | Sarasota          | FL    | 34231    | Brick & Mortar | 4 - Upper Income         |
| Waterside Lakewood Ranch BC | 6556 University Parkway    | Sarasota County, FL  | Sarasota          | FL    | 34240    | Brick & Mortar | 4 - Upper Income         |
| Honore BC                   | 8391 Honore Avenue         | Sarasota County, FL  | Sarasota          | FL    | 34238    | Brick & Mortar | 4 - Upper Income         |
| 44394 Casselberry BC        | 4580 South Highway 17 92   | Seminole County, FL  | Casselberry       | FL    | 32707    | Brick & Mortar | 2 - Moderate Income      |
| 44310 Altamonte BC          | 254 West State Road 436    | Seminole County, FL  | Altamonte Springs | FL    | 32714    | Brick & Mortar | 3 - Middle Income        |
| 44305 Oviedo BC             | 5 Alafaya Woods Boulevard  | Seminole County, FL  | Oviedo            | FL    | 32765    | Brick & Mortar | 3 - Middle Income        |
| 44344 Highlands BC          | 107 North US Highway 17 92 | Seminole County, FL  | Longwood          | FL    | 32750    | Brick & Mortar | 3 - Middle Income        |
| 44311 Lake Mary BC          | 766 North Sun Drive        | Seminole County, FL  | Lake Mary         | FL    | 32746    | Brick & Mortar | 4 - Upper Income         |
| 44389 Lake Forest FL BC     | 109 Bernini Way            | Seminole County, FL  | Sanford           | FL    | 32771    | Brick & Mortar | 4 - Upper Income         |
| Tuskawilla BC               | 1181 E State Rd 434        | Seminole County, FL  | Winter Springs    | FL    | 32708    | Brick & Mortar | 4 - Upper Income         |
| Beachwalk BC                | 775 County Road 210 W      | St Johns County, FL  | Saint Johns       | FL    | 32259    | Brick & Mortar | 3 - Middle Income        |
| 45361 Murabella BC          | 144 Registry Blvd          | St Johns County, FL  | St Augustine      | FL    | 32092    | Brick & Mortar | 3 - Middle Income        |
| 45309 Ponte Vedra BC        | 500 A1A North              | St Johns County, FL  | Ponte Vedra Beach | FL    | 32082    | Brick & Mortar | 4 - Upper Income         |
| Nocatee BC                  | 52 Village Lake Dr         | St Johns County, FL  | Ponte Vedra       | FL    | 32081    | Brick & Mortar | 4 - Upper Income         |
| Bartram Market BC           | 180 Bartram Market Drive   | St Johns County, FL  | Saint Johns       | FL    | 32259    | Brick & Mortar | 4 - Upper Income         |
| Tradition Square BC         | 10959 SW Village Parkway   | St. Lucie County, FL | Port St. Lucie    | FL    | 34987    | Brick & Mortar | 3 - Middle Income        |
| Pinellas Plaza BC           | 2495 Burnsed Boulevard     | Sumter County, FL    | The Villages      | FL    | 32163    | Brick & Mortar | 3 - Middle Income        |

| Name                            | Address                                    | County              | City           | State | Zip Code | Service Type       | Census Tract Income 2024 |
|---------------------------------|--------------------------------------------|---------------------|----------------|-------|----------|--------------------|--------------------------|
| Lake Deaton BC                  | 670 Kristine Way                           | Sumter County, FL   | The Villages   | FL    | 32163    | Brick & Mortar     | 3 - Middle Income        |
| Buffalo Ridge BC                | 3910 Wedgewood Lane                        | Sumter County, FL   | The Villages   | FL    | 32162    | Brick & Mortar     | 3 - Middle Income        |
| 44306 International Speedway BC | 1030 West International Speedway Boulevard | Volusia County, FL  | Daytona Beach  | FL    | 32114    | Brick & Mortar     | 2 - Moderate Income      |
| 44308 Port Orange BC            | 5100 Clyde Morris Boulevard                | Volusia County, FL  | Port Orange    | FL    | 32127    | Brick & Mortar     | 3 - Middle Income        |
| 44309 Ormond Beach BC           | 4 North Beach Street                       | Volusia County, FL  | Ormond Beach   | FL    | 32174    | Brick & Mortar     | 3 - Middle Income        |
| 44377 Elkcarn BC                | 2730 Elkcarn Boulevard                     | Volusia County, FL  | Deltona        | FL    | 32738    | Brick & Mortar     | 3 - Middle Income        |
| 44396 Deland BC                 | 900 North Spring Garden Avenue             | Volusia County, FL  | Deland         | FL    | 32720    | Brick & Mortar     | 4 - Upper Income         |
| Towne Lake BC                   | 2925 Eagle Dr                              | Cherokee County, GA | Woodstock      | GA    | 30189    | Brick & Mortar     | 4 - Upper Income         |
| 46356 Powers Ferry BC           | 1920 Powers Ferry Road                     | Cobb County, GA     | Marietta       | GA    | 30067    | Brick & Mortar     | 2 - Moderate Income      |
| 46357 Marietta Cobb Parkway BC  | 1017 Roswell Street                        | Cobb County, GA     | Marietta       | GA    | 30060    | Brick & Mortar     | 2 - Moderate Income      |
| 46343 Madison Place BC          | 745 Chastain Road                          | Cobb County, GA     | Kennesaw       | GA    | 30144    | Brick & Mortar     | 3 - Middle Income        |
| 46326 Roswell BM                | 2100 Roswell Road                          | Cobb County, GA     | Marietta       | GA    | 30062    | In-Store Bank Mart | 3 - Middle Income        |
| 46329 Kennesaw BM               | 3895 Cherokee Street                       | Cobb County, GA     | Kennesaw       | GA    | 30144    | In-Store Bank Mart | 3 - Middle Income        |
| 46375 Mableton BC               | 5049 Floyd Rd SW                           | Cobb County, GA     | Mableton       | GA    | 30126    | Brick & Mortar     | 3 - Middle Income        |
| 46304 Merchants Walk BC         | 4209 Roswell Road                          | Cobb County, GA     | Marietta       | GA    | 30062    | Brick & Mortar     | 4 - Upper Income         |
| 46352 Smyrna Cobb Parkway BC    | 2197 Cobb Parkway Southeast                | Cobb County, GA     | Smyrna         | GA    | 30080    | Brick & Mortar     | 4 - Upper Income         |
| Southeast Cobb BC               | 4520 S Cobb Drive SE                       | Cobb County, GA     | Smyrna         | GA    | 30080    | Brick & Mortar     | 4 - Upper Income         |
| 46331 Varner Crossing BM        | 4150 Macland Road                          | Cobb County, GA     | Powder Springs | GA    | 30127    | In-Store Bank Mart | 4 - Upper Income         |
| 46379 Shallowford BC            | 2941 Shallowford Rd                        | Cobb County, GA     | Marietta       | GA    | 30066    | Brick & Mortar     | 4 - Upper Income         |



| Name                              | Address                        | County              | City              | State | Zip Code | Service Type       | Census Tract Income 2024 |
|-----------------------------------|--------------------------------|---------------------|-------------------|-------|----------|--------------------|--------------------------|
| 46303 Belair Road BC              | 404 South Belair Road          | Columbia County, GA | Martinez          | GA    | 30907    | Brick & Mortar     | 4 - Upper Income         |
| Brookhaven BC                     | 3931 Buford Highway NE         | DeKalb County, GA   | Atlanta           | GA    | 30345    | Brick & Mortar     | 2 - Moderate Income      |
| Dunwoody BC                       | 1545 Mt Vernon Road            | Dekalb County, GA   | Dunwoody          | GA    | 30338    | Brick & Mortar     | 4 - Upper Income         |
| 46335 Lindbergh Plaza BC          | 2555 Piedmont Road Northeast   | Fulton County, GA   | Atlanta           | GA    | 30324    | Brick & Mortar     | 0 - Income Not Available |
| 46353 Georgia Pacific Downtown BC | 133 Peachtree Street Northeast | Fulton County, GA   | Atlanta           | GA    | 30303    | Brick & Mortar     | 0 - Income Not Available |
| 46355 Cascade-West End BM         | 590 Cascade Avenue SW          | Fulton County, GA   | Atlanta           | GA    | 30310    | In-Store Bank Mart | 2 - Moderate Income      |
| 46317 Saddlebrook BM              | 10945 State Bridge Road        | Fulton County, GA   | Alpharetta        | GA    | 30022    | In-Store Bank Mart | 3 - Middle Income        |
| 46308 Johns Creek BC              | 11033 Medlock Bridge Road      | Fulton County, GA   | Duluth            | GA    | 30097    | Brick & Mortar     | 4 - Upper Income         |
| 46313 Alpharetta BC               | 2755 Old Milton Parkway        | Fulton County, GA   | Alpharetta        | GA    | 30009    | Brick & Mortar     | 4 - Upper Income         |
| Bethany Village BC                | 13794 GA-9                     | Fulton County, GA   | Milton            | GA    | 30004    | Brick & Mortar     | 4 - Upper Income         |
| Roswell Crossing BC               | 665 West Crossville Road       | Fulton County, GA   | Roswell           | GA    | 30075    | Brick & Mortar     | 4 - Upper Income         |
| 46306 Buckhead Sovereign BC       | 3344 Peachtree Road Northeast  | Fulton County, GA   | Atlanta           | GA    | 30326    | Brick & Mortar     | 4 - Upper Income         |
| Duluth BC                         | 2161 Pleasant Hill Road NW     | Gwinnett County, GA | Duluth            | GA    | 30096    | Brick & Mortar     | 1 - Low Income           |
| 46307 Peachtree Corners BC        | 3210 Holcomb Bridge Rd.        | Gwinnett County, GA | Peachtree Corners | GA    | 30092    | Brick & Mortar     | 2 - Moderate Income      |
| 46309 Lawrenceville-Suwanee BC    | 870 Lawrenceville Suwanee Road | Gwinnett County, GA | Lawrenceville     | GA    | 30043    | Brick & Mortar     | 2 - Moderate Income      |
| 46346 Singleton Square BM         | 6050 Singleton Road            | Gwinnett County, GA | Norcross          | GA    | 30093    | In-Store Bank Mart | 2 - Moderate Income      |
| 46314 Lawrenceville BC            | 165 Nash Street                | Gwinnett County, GA | Lawrenceville     | GA    | 30046    | Brick & Mortar     | 3 - Middle Income        |
| Suwanee BC                        | 4065 McGinnis Ferry Rd         | Gwinnett County, GA | Suwanee           | GA    | 30024    | Brick & Mortar     | 3 - Middle Income        |
| 46310 Webb Gin BC                 | 1250 Scenic Hwy                | Gwinnett County, GA | Lawrenceville     | GA    | 30045    | Brick & Mortar     | 4 - Upper Income         |
| State Bridge Road BC              | 5960 State Bridge Road         | Gwinnett County, GA | Duluth            | GA    | 30097    | Brick & Mortar     | 4 - Upper Income         |

| Name                     | Address                   | County              | City          | State | Zip Code | Service Type       | Census Tract Income 2024 |
|--------------------------|---------------------------|---------------------|---------------|-------|----------|--------------------|--------------------------|
| Buford Drive BC          | 2485 Buford Drive         | Gwinnett County, GA | Lawrenceville | GA    | 30043    | Brick & Mortar     | 4 - Upper Income         |
| 46302 Peach Orchard BC   | 2756 Peach Orchard Road   | Richmond County, GA | Augusta       | GA    | 30906    | Brick & Mortar     | 2 - Moderate Income      |
| 46312 Loganville BM      | 4753 Atlanta Highway      | Walton County, GA   | Loganville    | GA    | 30052    | In-Store Bank Mart | 3 - Middle Income        |
| 59th and Western BC      | 5902 S Western Ave        | Cook County, IL     | Chicago       | IL    | 60636    | Brick & Mortar     | 1 - Low Income           |
| 02535 East Cicero BC     | 2500 South Cicero Avenue  | Cook County, IL     | Cicero        | IL    | 60804    | Brick & Mortar     | 1 - Low Income           |
| 23317 Melrose Park BC    | 2501 West North Avenue    | Cook County, IL     | Melrose Park  | IL    | 60160    | Brick & Mortar     | 1 - Low Income           |
| 02505 Auburn Highland BC | 8140 South Ashland Avenue | Cook County, IL     | Chicago       | IL    | 60620    | Brick & Mortar     | 1 - Low Income           |
| 02512 Harvey BC          | 174 East 154th Street     | Cook County, IL     | Harvey        | IL    | 60426    | Brick & Mortar     | 1 - Low Income           |
| 24348 Dolton BC          | 550 E. Sibley Blvd.       | Cook County, IL     | Dolton        | IL    | 60419    | Brick & Mortar     | 1 - Low Income           |
| 02491 Niles-Touhy BC     | 5950 West Touhy Avenue    | Cook County, IL     | Niles         | IL    | 60714    | Brick & Mortar     | 2 - Moderate Income      |
| 02578 Brickyard BC       | 2710 North Narragansett   | Cook County, IL     | Chicago       | IL    | 60639    | Brick & Mortar     | 2 - Moderate Income      |
| 24326 Milwaukee BC       | 2973 N. Milwaukee Ave.    | Cook County, IL     | Chicago       | IL    | 60618    | Brick & Mortar     | 2 - Moderate Income      |
| 01341 McKinley Park BC   | 1950 West 33rd Street     | Cook County, IL     | Chicago       | IL    | 60608    | Brick & Mortar     | 2 - Moderate Income      |
| 01569 Little Village BC  | 3957 West 26th Street     | Cook County, IL     | Chicago       | IL    | 60623    | Brick & Mortar     | 2 - Moderate Income      |
| 02536 Berwyn BC          | 7100 West Cermak Road     | Cook County, IL     | Berwyn        | IL    | 60402    | Brick & Mortar     | 2 - Moderate Income      |
| 02537 Cicero BC          | 6018 West Cermak Road     | Cook County, IL     | Cicero        | IL    | 60804    | Brick & Mortar     | 2 - Moderate Income      |
| 24359 Pilsen East BC     | 1625 W. 18th St.          | Cook County, IL     | Chicago       | IL    | 60608    | Brick & Mortar     | 2 - Moderate Income      |
| 01563 Stony Island BC    | 1606 East 79th Street     | Cook County, IL     | Chicago       | IL    | 60649    | Brick & Mortar     | 2 - Moderate Income      |
| 02508 Clearing BC        | 5241 West 63rd Street     | Cook County, IL     | Chicago       | IL    | 60638    | Brick & Mortar     | 2 - Moderate Income      |

| Name                           | Address                       | County          | City                  | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------|-------------------------------|-----------------|-----------------------|-------|----------|----------------|--------------------------|
| 23322 Bridgeview BC            | 7200 W. 87th Street           | Cook County, IL | Bridgeview            | IL    | 60455    | Brick & Mortar | 2 - Moderate Income      |
| 23356 Summit BC                | 5640 South Harlem Avenue      | Cook County, IL | Summit                | IL    | 60501    | Brick & Mortar | 2 - Moderate Income      |
| 24306 South Chicago BC         | 3030 E. 92nd Street           | Cook County, IL | Chicago               | IL    | 60617    | Brick & Mortar | 2 - Moderate Income      |
| 02496 Rolling Meadows BC       | 1801 Algonquin Road           | Cook County, IL | Rolling Meadows       | IL    | 60008    | Brick & Mortar | 2 - Moderate Income      |
| 02773 Des Plaines BC           | 510 Metropolitan Way          | Cook County, IL | Des Plaines           | IL    | 60016    | Brick & Mortar | 2 - Moderate Income      |
| 24378 Niles South BC           | 9190 W Golf Rd.               | Cook County, IL | Niles                 | IL    | 60714    | Brick & Mortar | 2 - Moderate Income      |
| 24379 Wheeling BC              | 125 McHenry Rd.               | Cook County, IL | Wheeling              | IL    | 60090    | Brick & Mortar | 2 - Moderate Income      |
| 01213 Morgan Park BC           | 11850 South Marshfield Avenue | Cook County, IL | Chicago               | IL    | 60643    | Brick & Mortar | 2 - Moderate Income      |
| 02521 South Chicago Heights BC | 3307 Chicago Road             | Cook County, IL | South Chicago Heights | IL    | 60411    | Brick & Mortar | 2 - Moderate Income      |
| 23313 Country Club Hills BC    | 4137 West 167th Street        | Cook County, IL | Country Club Hills    | IL    | 60478    | Brick & Mortar | 2 - Moderate Income      |
| 23333 Matteson BC              | 21403 Cicero Avenue           | Cook County, IL | Matteson              | IL    | 60443    | Brick & Mortar | 2 - Moderate Income      |
| 24319 South Holland BC         | 475 E. 162nd Street           | Cook County, IL | South Holland         | IL    | 60473    | Brick & Mortar | 2 - Moderate Income      |
| 24377 Cal City BC              | 925 Burnham Ave.              | Cook County, IL | Calumet City          | IL    | 60409    | Brick & Mortar | 2 - Moderate Income      |
| 24309 Bartlett East BC         | 388 S. Main St.               | Cook County, IL | Bartlett              | IL    | 60103    | Brick & Mortar | 2 - Moderate Income      |
| 01296 Evanston Main BC         | 2440 Main Street              | Cook County, IL | Evanston              | IL    | 60202    | Brick & Mortar | 3 - Middle Income        |
| 02447 Skokie BC                | 9344 Skokie Boulevard         | Cook County, IL | Skokie                | IL    | 60077    | Brick & Mortar | 3 - Middle Income        |
| 02488 Niles-Oakton BC          | 7100 West Oakton Street       | Cook County, IL | Niles                 | IL    | 60714    | Brick & Mortar | 3 - Middle Income        |
| 23328 Albany Park BC           | 4017 West Lawrence Avenue     | Cook County, IL | Chicago               | IL    | 60630    | Brick & Mortar | 3 - Middle Income        |
| 24301 Lincolnwood BC           | 6401 N. Lincoln Ave.          | Cook County, IL | Lincolnwood           | IL    | 60712    | Brick & Mortar | 3 - Middle Income        |

| Name                          | Address                   | County          | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------|---------------------------|-----------------|----------------|-------|----------|----------------|--------------------------|
| 24331 Gladstone BC            | 5670 N Milwaukee Ave      | Cook County, IL | Chicago        | IL    | 60646    | Brick & Mortar | 3 - Middle Income        |
| 24375 Lincoln Square BC       | 4800 N. Western Ave.      | Cook County, IL | Chicago        | IL    | 60625    | Brick & Mortar | 3 - Middle Income        |
| 24383 Skokie South BC         | 4400 Oakton Street        | Cook County, IL | Skokie         | IL    | 60076    | Brick & Mortar | 3 - Middle Income        |
| Countryside IL BC             | 600 West Plainfield       | Cook County, IL | Countryside    | IL    | 60525    | Brick & Mortar | 3 - Middle Income        |
| 24329 Ukrainian Village BC    | 936 N. Western Ave.       | Cook County, IL | Chicago        | IL    | 60622    | Brick & Mortar | 3 - Middle Income        |
| 24330 Western Avenue Drive BC | 820 N. Western Ave.       | Cook County, IL | Chicago        | IL    | 60622    | Brick & Mortar | 3 - Middle Income        |
| 02522 Wicker Park BC          | 1211 N Milwaukee Avenue   | Cook County, IL | Chicago        | IL    | 60642    | Brick & Mortar | 3 - Middle Income        |
| 02511 Evergreen Park BC       | 3017 West 95th Street     | Cook County, IL | Evergreen Park | IL    | 60805    | Brick & Mortar | 3 - Middle Income        |
| Oak Lawn BC                   | 4850 W 95th Street        | Cook County, IL | Oak Lawn       | IL    | 60453    | Brick & Mortar | 3 - Middle Income        |
| 02516 Orland Park BC          | 15330 Harlem Avenue       | Cook County, IL | Orland Park    | IL    | 60462    | Brick & Mortar | 3 - Middle Income        |
| 02842 Hyde Park IL BC         | 1420 East 53rd Street     | Cook County, IL | Chicago        | IL    | 60615    | Brick & Mortar | 3 - Middle Income        |
| 23329 Orland Square Mall BC   | 28 Orland Square Drive    | Cook County, IL | Orland Park    | IL    | 60462    | Brick & Mortar | 3 - Middle Income        |
| 24360 Burbank BC              | 5750 W. 87th St.          | Cook County, IL | Burbank        | IL    | 60459    | Brick & Mortar | 3 - Middle Income        |
| 24382 47th and Ashland BC     | 1542 W 47th Street        | Cook County, IL | Chicago        | IL    | 60609    | Brick & Mortar | 3 - Middle Income        |
| 23309 Schaumburg West BC      | 121 North Barrington Road | Cook County, IL | Schaumburg     | IL    | 60194    | Brick & Mortar | 3 - Middle Income        |
| 24328 Belmont BC              | 8300 W. Belmont Ave.      | Cook County, IL | Chicago        | IL    | 60634    | Brick & Mortar | 3 - Middle Income        |
| 01538 Palatine BC             | 1582 North Rand Road      | Cook County, IL | Palatine       | IL    | 60074    | Brick & Mortar | 3 - Middle Income        |
| 02498 Rosemont BC             | 7150 Mannheim Road        | Cook County, IL | Rosemont       | IL    | 60018    | Brick & Mortar | 3 - Middle Income        |
| 06095 Buffalo Grove BC        | 345 West Dundee Road      | Cook County, IL | Buffalo Grove  | IL    | 60089    | Brick & Mortar | 3 - Middle Income        |
| 23336 Niles Golf BC           | 8001 Golf Road            | Cook County, IL | Niles          | IL    | 60714    | Brick & Mortar | 3 - Middle Income        |

| Name                           | Address                    | County          | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------|----------------------------|-----------------|----------------|-------|----------|----------------|--------------------------|
| 23355 Des Plaines West BC      | 845 South Elmhurst Road    | Cook County, IL | Des Plaines    | IL    | 60016    | Brick & Mortar | 3 - Middle Income        |
| 24303 Rosemont South BC        | 6111 N. River Rd.          | Cook County, IL | Rosemont       | IL    | 60018    | Brick & Mortar | 3 - Middle Income        |
| 24347 Glenwood BC              | 18301 S Halsted St         | Cook County, IL | Glenwood       | IL    | 60425    | Brick & Mortar | 3 - Middle Income        |
| 24350 Oak Forest BC            | 15533 S. Cicero Ave.       | Cook County, IL | Oak Forest     | IL    | 60452    | Brick & Mortar | 3 - Middle Income        |
| 24351 Tinley Park Central BC   | 16700 S. Harlem Ave.       | Cook County, IL | Tinley Park    | IL    | 60477    | Brick & Mortar | 3 - Middle Income        |
| 02504 Waverly BC               | 525 Waverly Drive          | Cook County, IL | Elgin          | IL    | 60120    | Brick & Mortar | 3 - Middle Income        |
| Palos Heights BC               | 12701 S. Harlem Ave        | Cook County, IL | Palos Heights  | IL    | 60463    | Brick & Mortar | 4 - Upper Income         |
| 23319 Andersonville BC         | 5501 North Ashland Avenue  | Cook County, IL | Chicago        | IL    | 60640    | Brick & Mortar | 4 - Upper Income         |
| 24323 North Broadway BC        | 5918 N Broadway St         | Cook County, IL | Chicago        | IL    | 60660    | Brick & Mortar | 4 - Upper Income         |
| 24361 Morton Grove BC          | 6201 Dempster St.          | Cook County, IL | Morton Grove   | IL    | 60053    | Brick & Mortar | 4 - Upper Income         |
| Irving Park BC                 | 3926 N Damen Ave           | Cook County, IL | Chicago        | IL    | 60618    | Brick & Mortar | 4 - Upper Income         |
| 02542 Lagrange Park BC         | 401 North LaGrange Rd.     | Cook County, IL | La Grange Park | IL    | 60526    | Brick & Mortar | 4 - Upper Income         |
| Oak Park BC                    | 840 South Oak Park Avenue  | Cook County, IL | Oak Park       | IL    | 60304    | Brick & Mortar | 4 - Upper Income         |
| 24376 River Forest BC          | 7727 Lake St               | Cook County, IL | River Forest   | IL    | 60305    | Brick & Mortar | 4 - Upper Income         |
| 24322 Lemont BC                | 1151 State St.             | Cook County, IL | Lemont         | IL    | 60439    | Brick & Mortar | 4 - Upper Income         |
| 01173 Diversey and Clybourn BC | 2785 North Clybourn Avenue | Cook County, IL | Chicago        | IL    | 60614    | Brick & Mortar | 4 - Upper Income         |
| 01322 Wrigleyville BC          | 3601 North Broadway        | Cook County, IL | Chicago        | IL    | 60613    | Brick & Mortar | 4 - Upper Income         |
| 02518 Willis Tower BC          | 244 S. Franklin Street     | Cook County, IL | Chicago        | IL    | 60606    | Brick & Mortar | 4 - Upper Income         |
| 02644 East Loop BC             | 57 East Randolph St        | Cook County, IL | Chicago        | IL    | 60601    | Brick & Mortar | 4 - Upper Income         |
| 02685 North and Clybourn BC    | 837 West North Avenue      | Cook County, IL | Chicago        | IL    | 60642    | Brick & Mortar | 4 - Upper Income         |

| Name                         | Address                   | County          | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|------------------------------|---------------------------|-----------------|------------------|-------|----------|----------------|--------------------------|
| 02988 222 S Riverside BC     | 222 South Riverside Plaza | Cook County, IL | Chicago          | IL    | 60606    | Brick & Mortar | 4 - Upper Income         |
| 23302 Printers Row BC        | 601 South Clark Street    | Cook County, IL | Chicago          | IL    | 60605    | Brick & Mortar | 4 - Upper Income         |
| 23305 161 N Clark Street BC  | 161 North Clark           | Cook County, IL | Chicago          | IL    | 60601    | Brick & Mortar | 4 - Upper Income         |
| 24325 LaSalle and Madison BC | 2 S. LaSalle St.          | Cook County, IL | Chicago          | IL    | 60603    | Brick & Mortar | 4 - Upper Income         |
| 24335 Huron BC               | 33 W Huron St             | Cook County, IL | Chicago          | IL    | 60654    | Brick & Mortar | 4 - Upper Income         |
| 24352 West Loop BC           | 800 W. Madison St.        | Cook County, IL | Chicago          | IL    | 60607    | Brick & Mortar | 4 - Upper Income         |
| 24354 South Wacker BC        | 1 S. Wacker Drive         | Cook County, IL | Chicago          | IL    | 60606    | Brick & Mortar | 4 - Upper Income         |
| 24372 Lincoln Park BC        | 2401 N. Halsted St        | Cook County, IL | Chicago          | IL    | 60614    | Brick & Mortar | 4 - Upper Income         |
| Lakeview Main BC             | 829 W Belmont Ave         | Cook County, IL | Chicago          | IL    | 60657    | Brick & Mortar | 4 - Upper Income         |
| 02517 Orland West BC         | 10759 West 159th Street   | Cook County, IL | Orland Park      | IL    | 60467    | Brick & Mortar | 4 - Upper Income         |
| 24307 Palatine - Euclid BC   | 700 W. Euclid Ave.        | Cook County, IL | Palatine         | IL    | 60067    | Brick & Mortar | 4 - Upper Income         |
| 24317 South Barrington BC    | 100 W. Higgins Rd         | Cook County, IL | South Barrington | IL    | 60010    | Brick & Mortar | 4 - Upper Income         |
| 24318 Schaumburg East BC     | 1199 E Higgins Rd         | Cook County, IL | Schaumburg       | IL    | 60173    | Brick & Mortar | 4 - Upper Income         |
| 01537 Deerfield BC           | 240 Skokie Boulevard      | Cook County, IL | Northbrook       | IL    | 60062    | Brick & Mortar | 4 - Upper Income         |
| 02492 Northbrook BC          | 1300 Meadow Road          | Cook County, IL | Northbrook       | IL    | 60062    | Brick & Mortar | 4 - Upper Income         |
| 02624 Glenview BC            | 1529 Waukegan Road        | Cook County, IL | Glenview         | IL    | 60025    | Brick & Mortar | 4 - Upper Income         |
| 06357 Mt Prospect BC         | 235 West Rand Road        | Cook County, IL | Mount Prospect   | IL    | 60056    | Brick & Mortar | 4 - Upper Income         |
| 24304 Glenview North BC      | 2823 Pfingsten Rd         | Cook County, IL | Glenview         | IL    | 60026    | Brick & Mortar | 4 - Upper Income         |
| 24316 Northbrook Willow BC   | 1090 Willow Rd.           | Cook County, IL | Northbrook       | IL    | 60062    | Brick & Mortar | 4 - Upper Income         |
| 24357 Mt. Prospect East BC   | 15 E. Prospect Ave.       | Cook County, IL | Mount Prospect   | IL    | 60056    | Brick & Mortar | 4 - Upper Income         |

| Name                         | Address                     | County            | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|------------------------------|-----------------------------|-------------------|----------------|-------|----------|----------------|--------------------------|
| 23311 Olympia Fields BC      | 2440 Lincoln Highway        | Cook County, IL   | Olympia Fields | IL    | 60461    | Brick & Mortar | 4 - Upper Income         |
| 02524 Dekalb BC              | 2707 Sycamore Road          | DeKalb County, IL | DeKalb         | IL    | 60115    | Brick & Mortar | 2 - Moderate Income      |
| 23304 West Chicago BC        | 1800 North Neltor Boulevard | DuPage County, IL | West Chicago   | IL    | 60185    | Brick & Mortar | 2 - Moderate Income      |
| 02456 Fox Valley Villages BC | 2998 Ogden Avenue           | DuPage County, IL | Aurora         | IL    | 60504    | Brick & Mortar | 3 - Middle Income        |
| 02474 Woodridge BC           | 7515 Janes Avenue           | DuPage County, IL | Woodridge      | IL    | 60517    | Brick & Mortar | 3 - Middle Income        |
| 23350 Woodridge North BC     | 2353 63rd Street            | DuPage County, IL | Woodridge      | IL    | 60517    | Brick & Mortar | 3 - Middle Income        |
| 24339 Darien BC              | 2401 75th St.               | DuPage County, IL | Darien         | IL    | 60561    | Brick & Mortar | 3 - Middle Income        |
| 23316 Lombard Yorktown BC    | 96 Yorktown Shopping Center | DuPage County, IL | Lombard        | IL    | 60148    | Brick & Mortar | 3 - Middle Income        |
| 24343 Addison BC             | 777 W Army Trail Blvd       | DuPage County, IL | Addison        | IL    | 60101    | Brick & Mortar | 3 - Middle Income        |
| 24363 Elmhurst North BC      | 990 N York St               | DuPage County, IL | Elmhurst       | IL    | 60126    | Brick & Mortar | 3 - Middle Income        |
| Naperville East BC           | 1175 E Ogden                | DuPage County, IL | Naperville     | IL    | 60563    | Brick & Mortar | 4 - Upper Income         |
| 24333 Burr Ridge South BC    | 8300 S Madison Street       | DuPage County, IL | Burr Ridge     | IL    | 60527    | Brick & Mortar | 4 - Upper Income         |
| 02458 Naperville BC          | 1296 Rickert Drive          | DuPage County, IL | Naperville     | IL    | 60540    | Brick & Mortar | 4 - Upper Income         |
| 24334 Aurora East BC         | 2992 Indian Trail Rd        | DuPage County, IL | Aurora         | IL    | 60502    | Brick & Mortar | 4 - Upper Income         |
| 01160 Glen Ellyn BC          | 704 East Roosevelt Road     | DuPage County, IL | Glen Ellyn     | IL    | 60137    | Brick & Mortar | 4 - Upper Income         |
| 02472 Wheaton BC             | 1500 North Main Street      | DuPage County, IL | Wheaton        | IL    | 60187    | Brick & Mortar | 4 - Upper Income         |
| 02484 Itasca BC              | 600 Park Boulevard          | DuPage County, IL | Itasca         | IL    | 60143    | Brick & Mortar | 4 - Upper Income         |
| 02528 Bloomingdale IL BC     | 330 W Army Trail Road       | DuPage County, IL | Bloomingdale   | IL    | 60108    | Brick & Mortar | 4 - Upper Income         |
| 02541 Elmhurst BC            | 105 South York Street       | DuPage County, IL | Elmhurst       | IL    | 60126    | Brick & Mortar | 4 - Upper Income         |
| 02543 Lombard-Downtown BC    | 211 West St. Charles Road   | DuPage County, IL | Lombard        | IL    | 60148    | Brick & Mortar | 4 - Upper Income         |

| Name                      | Address                    | County               | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------|----------------------------|----------------------|------------------|-------|----------|----------------|--------------------------|
| 02546 Ogden at 83 BC      | 640 Pasquinelli Drive      | DuPage County, IL    | Westmont         | IL    | 60559    | Brick & Mortar | 4 - Upper Income         |
| 24332 North Oakbrook BC   | 1400 16th St               | DuPage County, IL    | Oak Brook        | IL    | 60523    | Brick & Mortar | 4 - Upper Income         |
| 04762 Effingham BC        | 200 East Jefferson Avenue  | Effingham County, IL | Effingham        | IL    | 62401    | Brick & Mortar | 3 - Middle Income        |
| 04769 Mt Vernon IL BC     | 2711 Broadway Street       | Jefferson County, IL | Mount Vernon     | IL    | 62864    | Brick & Mortar | 3 - Middle Income        |
| 02450 Aurora Downtown BC  | 34 South Broadway          | Kane County, IL      | Aurora           | IL    | 60505    | Brick & Mortar | 2 - Moderate Income      |
| 02466 West Plaza BC       | 1851 West Galena Boulevard | Kane County, IL      | Aurora           | IL    | 60506    | Brick & Mortar | 2 - Moderate Income      |
| 02464 St Charles-West BC  | 700 South Randall Road     | Kane County, IL      | Saint Charles    | IL    | 60174    | Brick & Mortar | 3 - Middle Income        |
| 02485 Larkin BC           | 1645 Larkin Avenue         | Kane County, IL      | Elgin            | IL    | 60123    | Brick & Mortar | 3 - Middle Income        |
| 02451 Batavia IL BC       | 165 West Wilson Street     | Kane County, IL      | Batavia          | IL    | 60510    | Brick & Mortar | 4 - Upper Income         |
| 02460 Randall Square BC   | 1776 South Randall Road    | Kane County, IL      | Geneva           | IL    | 60134    | Brick & Mortar | 4 - Upper Income         |
| 02462 St Charles-East BC  | 1600 East Main Street      | Kane County, IL      | Saint Charles    | IL    | 60174    | Brick & Mortar | 4 - Upper Income         |
| 02477 Carpentersville BC  | 154 South Western Avenue   | Kane County, IL      | Carpentersville  | IL    | 60110    | Brick & Mortar | 4 - Upper Income         |
| 06126 South Elgin BC      | 460 Randall Road           | Kane County, IL      | South Elgin      | IL    | 60177    | Brick & Mortar | 4 - Upper Income         |
| 02454 Douglas Square BC   | One East Merchants Drive   | Kendall County, IL   | Oswego           | IL    | 60543    | Brick & Mortar | 2 - Moderate Income      |
| 23337 Oswego BC           | 2660 Route 34              | Kendall County, IL   | Oswego           | IL    | 60543    | Brick & Mortar | 4 - Upper Income         |
| Wauconda BC               | 472 West Liberty St        | Lake County, IL      | Wauconda         | IL    | 60084    | Brick & Mortar | 2 - Moderate Income      |
| 02503 Waukegan BC         | 702 North Green Bay Road   | Lake County, IL      | Waukegan         | IL    | 60085    | Brick & Mortar | 2 - Moderate Income      |
| 02478 Gurnee BC           | 4840 Grand Avenue          | Lake County, IL      | Gurnee           | IL    | 60031    | Brick & Mortar | 3 - Middle Income        |
| 02852 Round Lake Beach BC | 454 East Rollins Road      | Lake County, IL      | Round Lake Beach | IL    | 60073    | Brick & Mortar | 3 - Middle Income        |
| 24313 Mundelein West BC   | 3196 W.Route 60            | Lake County, IL      | Mundelein        | IL    | 60060    | Brick & Mortar | 3 - Middle Income        |



| Name                      | Address                  | County                | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------|--------------------------|-----------------------|--------------|-------|----------|----------------|--------------------------|
| 02482 Hutchins BC         | 7500 Grand Avenue        | Lake County, IL       | Gurnee       | IL    | 60031    | Brick & Mortar | 4 - Upper Income         |
| 06355 Lake Forest West BC | 990 South Waukegan Road  | Lake County, IL       | Lake Forest  | IL    | 60045    | Brick & Mortar | 4 - Upper Income         |
| 23306 Kildeer BC          | 20896 N. Quentin Road    | Lake County, IL       | Kildeer      | IL    | 60047    | Brick & Mortar | 4 - Upper Income         |
| 24308 Lake Zurich West BC | 459 S. Rand Road         | Lake County, IL       | Lake Zurich  | IL    | 60047    | Brick & Mortar | 4 - Upper Income         |
| 24381 Vernon Hills BC     | 1620 N Milwaukee Ave     | Lake County, IL       | Vernon Hills | IL    | 60061    | Brick & Mortar | 4 - Upper Income         |
| 02523 Crystal Lake BC     | 265 Virginia Street      | McHenry County, IL    | Crystal Lake | IL    | 60014    | Brick & Mortar | 2 - Moderate Income      |
| 02476 Cary IL BC          | 750 Northwest Highway    | McHenry County, IL    | Cary         | IL    | 60013    | Brick & Mortar | 3 - Middle Income        |
| 02483 Island Lake BC      | 525 Newport Court        | McHenry County, IL    | Island Lake  | IL    | 60042    | Brick & Mortar | 3 - Middle Income        |
| 06354 McHenry BC          | 2121 North Richmond Road | McHenry County, IL    | McHenry      | IL    | 60050    | Brick & Mortar | 3 - Middle Income        |
| 06094 Algonquin BC        | 450 South Randall Road   | McHenry County, IL    | Algonquin    | IL    | 60102    | Brick & Mortar | 4 - Upper Income         |
| 02527 Freeport BC         | 1534 South West Avenue   | Stephenson County, IL | Freeport     | IL    | 61032    | Brick & Mortar | 2 - Moderate Income      |
| 02533 Sterling BC         | 3014 East Lincolnway     | Whiteside County, IL  | Sterling     | IL    | 61081    | Brick & Mortar | 3 - Middle Income        |
| 23314 Romeoville BC       | 275 South Weber Road     | Will County, IL       | Romeoville   | IL    | 60446    | Brick & Mortar | 3 - Middle Income        |
| 01527 Shorewood BC        | 251 Brook Forest Avenue  | Will County, IL       | Shorewood    | IL    | 60404    | Brick & Mortar | 4 - Upper Income         |
| 02687 Naperville-South BC | 2644 Showplace Drive     | Will County, IL       | Naperville   | IL    | 60564    | Brick & Mortar | 4 - Upper Income         |
| 24336 Bolingbrook BC      | 455 S. Weber Rd          | Will County, IL       | Bolingbrook  | IL    | 60490    | Brick & Mortar | 4 - Upper Income         |
| 02514 Mokena BC           | 19201 La Grange Road     | Will County, IL       | Mokena       | IL    | 60448    | Brick & Mortar | 4 - Upper Income         |
| 23318 New Lenox BC        | 2051 East Laraway Road   | Will County, IL       | New Lenox    | IL    | 60451    | Brick & Mortar | 4 - Upper Income         |
| 00684 Marion West BC      | 3402 Heartland Street    | Williamson County, IL | Marion       | IL    | 62959    | Brick & Mortar | 4 - Upper Income         |

| Name                         | Address                       | County                 | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|------------------------------|-------------------------------|------------------------|----------------|-------|----------|----------------|--------------------------|
| 01253 Rockford Riverside BC  | 3936 West Riverside Boulevard | Winnebago County, IL   | Rockford       | IL    | 61101    | Brick & Mortar | 2 - Moderate Income      |
| 02532 Rockford McFarland BC  | 3154 McFarland Road           | Winnebago County, IL   | Rockford       | IL    | 61114    | Brick & Mortar | 4 - Upper Income         |
| 04674 Decatur BC             | 304 E. Monroe St.             | Adams County, IN       | Decatur        | IN    | 46733    | Brick & Mortar | 3 - Middle Income        |
| 04673 Southtown Mall BC      | 1110 East Tillman Road        | Allen County, IN       | Fort Wayne     | IN    | 46816    | Brick & Mortar | 2 - Moderate Income      |
| 04340 Lima Rd BC             | 6026 Lima Road                | Allen County, IN       | Fort Wayne     | IN    | 46818    | Brick & Mortar | 3 - Middle Income        |
| 04676 Illinois Rd BC         | 5925 Illinois Road            | Allen County, IN       | Fort Wayne     | IN    | 46804    | Brick & Mortar | 3 - Middle Income        |
| 04679 Georgetown/Ft Wayne BC | 6411 East State Boulevard     | Allen County, IN       | Fort Wayne     | IN    | 46815    | Brick & Mortar | 3 - Middle Income        |
| 04680 Dupont Crossing BC     | 720 East DuPont Road          | Allen County, IN       | Fort Wayne     | IN    | 46825    | Brick & Mortar | 4 - Upper Income         |
| 04652 Columbus North BC      | 2117 25th Street              | Bartholomew County, IN | Columbus       | IN    | 47201    | Brick & Mortar | 3 - Middle Income        |
| Zionsville BC                | 6523 Whitestown Parkway       | Boone County, IN       | Zionsville     | IN    | 46077    | Brick & Mortar | 4 - Upper Income         |
| 04659 Nashville BC           | 100 Commercial Street         | Brown County, IN       | Nashville      | IN    | 47448    | Brick & Mortar | 3 - Middle Income        |
| Veterans Parkway BC          | 1610 Veterans Parkway         | Clark County, IN       | Jeffersonville | IN    | 47130    | Brick & Mortar | 2 - Moderate Income      |
| 00341 Lawrenceburg BC        | 431 West Eads Parkway         | Dearborn County, IN    | Lawrenceburg   | IN    | 47025    | Brick & Mortar | 2 - Moderate Income      |
| 00193 Greensburg Main BC     | 314 West Main Street          | Decatur County, IN     | Greensburg     | IN    | 47240    | Brick & Mortar | 3 - Middle Income        |
| 04766 Jasper South BC        | 305 Highway 231 South         | Dubois County, IN      | Jasper         | IN    | 47546    | Brick & Mortar | 3 - Middle Income        |
| 02551 Elkhart BC             | 400 North Main Street         | Elkhart County, IN     | Elkhart        | IN    | 46516    | Brick & Mortar | 2 - Moderate Income      |
| 00337 Connersville BC        | 120 West Fifth Street         | Fayette County, IN     | Connersville   | IN    | 47331    | Brick & Mortar | 2 - Moderate Income      |
| 00823 Grant Line Rd BC       | 3401 Grant Line Road          | Floyd County, IN       | New Albany     | IN    | 47150    | Brick & Mortar | 2 - Moderate Income      |
| 04772 Princeton BC           | 1506 West Broadway            | Gibson County, IN      | Princeton      | IN    | 47670    | Brick & Mortar | 2 - Moderate Income      |

| Name                           | Address                         | County               | City          | State | Zip Code | Service Type       | Census Tract Income 2024 |
|--------------------------------|---------------------------------|----------------------|---------------|-------|----------|--------------------|--------------------------|
| 04789 Haubstadt BC             | 601 East State Road 68          | Gibson County, IN    | Haubstadt     | IN    | 47639    | Brick & Mortar     | 4 - Upper Income         |
| 00296 Carmel BC                | 205 East Carmel Drive           | Hamilton County, IN  | Carmel        | IN    | 46032    | Brick & Mortar     | 3 - Middle Income        |
| 04345 Fishers Corner BC        | 11662 Commercial Boulevard      | Hamilton County, IN  | Fishers       | IN    | 46038    | Brick & Mortar     | 3 - Middle Income        |
| 04671 Noblesville BC           | 16864 Clover Road               | Hamilton County, IN  | Noblesville   | IN    | 46060    | Brick & Mortar     | 3 - Middle Income        |
| 00290 Hamilton Southeastern BC | 13681 East 116th Street         | Hamilton County, IN  | Fishers       | IN    | 46037    | Brick & Mortar     | 4 - Upper Income         |
| 00681 Westfield BC             | 3443 East State Road 32         | Hamilton County, IN  | Westfield     | IN    | 46074    | Brick & Mortar     | 4 - Upper Income         |
| 04341 West Carmel BC           | 10215 North Michigan Road       | Hamilton County, IN  | Carmel        | IN    | 46032    | Brick & Mortar     | 4 - Upper Income         |
| 116th and Allisonville BC      | 11555 Allisonville Rd.          | Hamilton County, IN  | Fishers       | IN    | 46038    | Brick & Mortar     | 4 - Upper Income         |
| 00604 Brandywine Plaza BM      | 1571 North State Street         | Hancock County, IN   | Greenfield    | IN    | 46140    | In-Store Bank Mart | 2 - Moderate Income      |
| 00291 New Palestine BC         | 5902 West US 52                 | Hancock County, IN   | New Palestine | IN    | 46163    | Brick & Mortar     | 4 - Upper Income         |
| 00613 Plainfield BC            | 2101 Stanley Road               | Hendricks County, IN | Plainfield    | IN    | 46168    | Brick & Mortar     | 3 - Middle Income        |
| Brownsburg BC                  | 947 North Green St              | Hendricks County, IN | Brownsburg    | IN    | 46112    | Brick & Mortar     | 3 - Middle Income        |
| 04343 Avon IN BC               | 10595 East US Highway 36        | Hendricks County, IN | Avon          | IN    | 46123    | Brick & Mortar     | 3 - Middle Income        |
| 04342 Heartland Crossing BC    | 8430 Windfall Lane              | Hendricks County, IN | Camby         | IN    | 46113    | Brick & Mortar     | 4 - Upper Income         |
| 04714 DeMotte BC               | 128 Halleck Street NW           | Jasper County, IN    | DeMotte       | IN    | 46310    | Brick & Mortar     | 3 - Middle Income        |
| 04731 Rensselaer BC            | 201 North Van Rensselaer Street | Jasper County, IN    | Rensselaer    | IN    | 47978    | Brick & Mortar     | 3 - Middle Income        |
| 04654 Franklin IN BC           | 1160 North Main Street          | Johnson County, IN   | Franklin      | IN    | 46131    | Brick & Mortar     | 2 - Moderate Income      |
| 00606 Meridian Parke BC        | 106 North State Road 135        | Johnson County, IN   | Greenwood     | IN    | 46142    | Brick & Mortar     | 3 - Middle Income        |
| 04644 Mt Pleasant IN BC        | 1168 North Bluff Road           | Johnson County, IN   | Greenwood     | IN    | 46142    | Brick & Mortar     | 3 - Middle Income        |
| 04655 Greenwood BC             | 801 West Smith Valley Road      | Johnson County, IN   | Greenwood     | IN    | 46142    | Brick & Mortar     | 3 - Middle Income        |

| Name                                | Address                     | County             | City          | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------------|-----------------------------|--------------------|---------------|-------|----------|----------------|--------------------------|
| 04788 Vincennes BC                  | 2400 Hart Street            | Knox County, IN    | Vincennes     | IN    | 47591    | Brick & Mortar | 2 - Moderate Income      |
| 04725 Miller BC                     | 518 South Lake Street       | Lake County, IN    | Gary          | IN    | 46403    | Brick & Mortar | 1 - Low Income           |
| 04701 Junedale BC                   | 5100 Broadway               | Lake County, IN    | Gary          | IN    | 46408    | Brick & Mortar | 2 - Moderate Income      |
| 04711 Crown Point BC                | 310 East Joliet Street      | Lake County, IN    | Crown Point   | IN    | 46307    | Brick & Mortar | 2 - Moderate Income      |
| 04700 Highland BC                   | 2203 45th Street            | Lake County, IN    | Highland      | IN    | 46322    | Brick & Mortar | 3 - Middle Income        |
| 04723 Merrillville South BC         | 8477 Broadway               | Lake County, IN    | Merrillville  | IN    | 46410    | Brick & Mortar | 3 - Middle Income        |
| 02845 Hammond In BC                 | 1716 165th Street           | Lake County, IN    | Hammond       | IN    | 46320    | Brick & Mortar | 3 - Middle Income        |
| 04733 Schererville BC               | 1545 US Highway 41          | Lake County, IN    | Schererville  | IN    | 46375    | Brick & Mortar | 4 - Upper Income         |
| 23335 St John BC                    | 9805 Wicker Avenue          | Lake County, IN    | Saint John    | IN    | 46373    | Brick & Mortar | 4 - Upper Income         |
| 01175 Munster IN BC                 | 8007 Calumet Avenue         | Lake County, IN    | Munster       | IN    | 46321    | Brick & Mortar | 4 - Upper Income         |
| 04721 LaPorte BC                    | 801 Monroe Street           | LaPorte County, IN | La Porte      | IN    | 46350    | Brick & Mortar | 2 - Moderate Income      |
| 04724 Michigan City BC              | 2604 Franklin Street        | LaPorte County, IN | Michigan City | IN    | 46360    | Brick & Mortar | 2 - Moderate Income      |
| 00270 Lawrence BC                   | 6909 East 38 Street         | Marion County, IN  | Indianapolis  | IN    | 46226    | Brick & Mortar | 1 - Low Income           |
| 00299 University of Indianapolis BC | 3995 Shelby Street          | Marion County, IN  | Indianapolis  | IN    | 46227    | Brick & Mortar | 1 - Low Income           |
| 65301 Lynhurst and Washington BC    | 5075 West Washington Street | Marion County, IN  | Indianapolis  | IN    | 46241    | Brick & Mortar | 1 - Low Income           |
| 00293 Washington Village BC         | 9365 East Washington Street | Marion County, IN  | Indianapolis  | IN    | 46229    | Brick & Mortar | 2 - Moderate Income      |
| 00332 Southport Rd BC               | 4040 East Southport Road    | Marion County, IN  | Indianapolis  | IN    | 46237    | Brick & Mortar | 2 - Moderate Income      |
| 04647 Beech Grove BC                | 4810 South Emerson Avenue   | Marion County, IN  | Indianapolis  | IN    | 46203    | Brick & Mortar | 2 - Moderate Income      |
| 00335 North Michigan Rd BC          | 8301 North Michigan Road    | Marion County, IN  | Indianapolis  | IN    | 46268    | Brick & Mortar | 2 - Moderate Income      |
| 00247 Stop 11 BC                    | 7921 US 31 South            | Marion County, IN  | Indianapolis  | IN    | 46227    | Brick & Mortar | 2 - Moderate Income      |

| Name                             | Address                     | County            | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|----------------------------------|-----------------------------|-------------------|--------------|-------|----------|----------------|--------------------------|
| 00298 Georgetown/Indianapolis BC | 5692 Georgetown Road        | Marion County, IN | Indianapolis | IN    | 46254    | Brick & Mortar | 2 - Moderate Income      |
| 00306 Chapel Hill BC             | 7373 West 10th Street       | Marion County, IN | Indianapolis | IN    | 46214    | Brick & Mortar | 2 - Moderate Income      |
| 00331 Speedway BC                | 5914 Crawfordsville Road    | Marion County, IN | Indianapolis | IN    | 46224    | Brick & Mortar | 2 - Moderate Income      |
| 65302 Maple Road BC              | 101 East 38th Street        | Marion County, IN | Indianapolis | IN    | 46205    | Brick & Mortar | 2 - Moderate Income      |
| 00136 Castleton BC               | 6071 East 82nd Street       | Marion County, IN | Indianapolis | IN    | 46250    | Brick & Mortar | 3 - Middle Income        |
| 00154 Keystone BC                | 2411 East 71st Street       | Marion County, IN | Indianapolis | IN    | 46220    | Brick & Mortar | 3 - Middle Income        |
| 01102 Fort Harrison BC           | 9025 East 56th Street       | Marion County, IN | Indianapolis | IN    | 46216    | Brick & Mortar | 3 - Middle Income        |
| 00295 Geist BC                   | 8120 Oaklondon Road         | Marion County, IN | Indianapolis | IN    | 46236    | Brick & Mortar | 4 - Upper Income         |
| 00297 Nora BC                    | 8549 North College Avenue   | Marion County, IN | Indianapolis | IN    | 46240    | Brick & Mortar | 4 - Upper Income         |
| 00330 Capital Ctr BC             | 251 North Illinois Street   | Marion County, IN | Indianapolis | IN    | 46204    | Brick & Mortar | 4 - Upper Income         |
| 04641 Bloomington Main BC        | 200 South Washington Street | Monroe County, IN | Bloomington  | IN    | 47408    | Brick & Mortar | 1 - Low Income           |
| 04650 College Mall BC            | 3200 East Third Street      | Monroe County, IN | Bloomington  | IN    | 47401    | Brick & Mortar | 4 - Upper Income         |
| 04667 Whitehall Plaza BC         | 3415 West 3rd Street        | Monroe County, IN | Bloomington  | IN    | 47404    | Brick & Mortar | 4 - Upper Income         |
| 04664 Rockville BC               | 720 North Lincoln Road      | Parke County, IN  | Rockville    | IN    | 47872    | Brick & Mortar | 3 - Middle Income        |
| 04773 Tell City BC               | 45 West US Highway 66       | Perry County, IN  | Tell City    | IN    | 47586    | Brick & Mortar | 3 - Middle Income        |
| 04705 Vale Park BC               | 808 Vale Park Road          | Porter County, IN | Valparaiso   | IN    | 46383    | Brick & Mortar | 3 - Middle Income        |
| 04706 Valparaiso Main BC         | 56 South Washington Street  | Porter County, IN | Valparaiso   | IN    | 46383    | Brick & Mortar | 3 - Middle Income        |
| 04730 Portage BC                 | 2655 Willow Creek Road      | Porter County, IN | Portage      | IN    | 46368    | Brick & Mortar | 3 - Middle Income        |

| Name                                   | Address                       | County                 | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|----------------------------------------|-------------------------------|------------------------|----------------|-------|----------|----------------|--------------------------|
| 04709 Chesterton BC                    | 302 Broadway                  | Porter County, IN      | Chesterton     | IN    | 46304    | Brick & Mortar | 4 - Upper Income         |
| 04770 Mt Vernon IN BC                  | 112 East 3rd Street           | Posey County, IN       | Mount Vernon   | IN    | 47620    | Brick & Mortar | 2 - Moderate Income      |
| 00191 Batesville BC                    | 1 Batesville Shopping Village | Ripley County, IN      | Batesville     | IN    | 47006    | Brick & Mortar | 3 - Middle Income        |
| 00339 Shelbyville IN BC                | 110 North Harrison Street     | Shelby County, IN      | Shelbyville    | IN    | 46176    | Brick & Mortar | 2 - Moderate Income      |
| 02548 South Bend BC                    | 301 North Main Street         | St. Joseph County, IN  | South Bend     | IN    | 46601    | Brick & Mortar | 2 - Moderate Income      |
| 02446 Mishawaka BC                     | 5645 North Main Street        | St. Joseph County, IN  | Mishawaka      | IN    | 46545    | Brick & Mortar | 3 - Middle Income        |
| 04681 Angola BC                        | 100 Growth Parkway            | Steuben County, IN     | Angola         | IN    | 46703    | Brick & Mortar | 3 - Middle Income        |
| 04665 Sullivan BC                      | 201 West Washington Street    | Sullivan County, IN    | Sullivan       | IN    | 47882    | Brick & Mortar | 3 - Middle Income        |
| 04663 Commerce Place BC                | 3620 South Street             | Tippecanoe County, IN  | Lafayette      | IN    | 47905    | Brick & Mortar | 2 - Moderate Income      |
| 04666 University Square BC             | 500 Sagamore Parkway West     | Tippecanoe County, IN  | West Lafayette | IN    | 47906    | Brick & Mortar | 4 - Upper Income         |
| 04760 Fifth Third Center Evansville BC | 20 Northwest 3rd Street       | Vanderburgh County, IN | Evansville     | IN    | 47708    | Brick & Mortar | 0 - Income Not Available |
| Burkhardt BC                           | 6245 Vogel Road               | Vanderburgh County, IN | Evansville     | IN    | 47715    | Brick & Mortar | 2 - Moderate Income      |
| 04797 North Park BC                    | 4550 North First Avenue       | Vanderburgh County, IN | Evansville     | IN    | 47710    | Brick & Mortar | 3 - Middle Income        |
| 04819 West Side BC                     | 2320 West Illinois Street     | Vanderburgh County, IN | Evansville     | IN    | 47712    | Brick & Mortar | 3 - Middle Income        |
| 04812 University Heights BC            | 5344 Pearl Drive              | Vanderburgh County, IN | Evansville     | IN    | 47712    | Brick & Mortar | 4 - Upper Income         |
| 06358 Northfield BC                    | 12626 US 41                   | Vanderburgh County, IN | Evansville     | IN    | 47725    | Brick & Mortar | 4 - Upper Income         |
| 04784 East Side BC                     | 661 South Green River Road    | Vanderburgh County, IN | Evansville     | IN    | 47715    | Brick & Mortar | 4 - Upper Income         |
| 04646 Terre Haute Main BC              | 350 Wabash Avenue             | Vigo County, IN        | Terre Haute    | IN    | 47807    | Brick & Mortar | 0 - Income Not Available |
| 04658 Meadows BC                       | 2511 Poplar Street            | Vigo County, IN        | Terre Haute    | IN    | 47803    | Brick & Mortar | 2 - Moderate Income      |

| Name                          | Address                      | County              | City             | State | Zip Code | Service Type       | Census Tract Income 2024 |
|-------------------------------|------------------------------|---------------------|------------------|-------|----------|--------------------|--------------------------|
| 04642 Honey Creek Commons BC  | 5627 South U.S. Highway 41   | Vigo County, IN     | Terre Haute      | IN    | 47802    | Brick & Mortar     | 3 - Middle Income        |
| 04777 Bell Oaks BC            | 8422 Bell Oaks Drive         | Warrick County, IN  | Newburgh         | IN    | 47630    | Brick & Mortar     | 4 - Upper Income         |
| 00248 Airport CVG BC          | 3087B Terminal Drive         | Boone County, KY    | Hebron           | KY    | 41048    | Facility           | 0 - Income Not Available |
| 06370 Mt Zion BC              | 335 Mount Zion Road          | Boone County, KY    | Florence         | KY    | 41042    | Brick & Mortar     | 1 - Low Income           |
| 00250 Burlington Pike BC      | 8100 Burlington Pike         | Boone County, KY    | Florence         | KY    | 41042    | Brick & Mortar     | 2 - Moderate Income      |
| 00362 Hebron BC               | 3095 North Bend Road         | Boone County, KY    | Hebron           | KY    | 41048    | Brick & Mortar     | 3 - Middle Income        |
| 00607 Burlington BM           | 1751 Patrick Drive           | Boone County, KY    | Burlington       | KY    | 41005    | In-Store Bank Mart | 3 - Middle Income        |
| 00374 Union Promenade BC      | 9100 US Hwy 42               | Boone County, KY    | Union            | KY    | 41091    | Brick & Mortar     | 4 - Upper Income         |
| 02510 Richwood BC             | 340 Richwood Road            | Boone County, KY    | Walton           | KY    | 41094    | Brick & Mortar     | 4 - Upper Income         |
| 00376 Paris BC                | 3350 Lexington Road          | Bourbon County, KY  | Paris            | KY    | 40361    | Brick & Mortar     | 3 - Middle Income        |
| 00214 Ashland Main BC         | 1422 Winchester Avenue       | Boyd County, KY     | Ashland          | KY    | 41101    | Brick & Mortar     | 2 - Moderate Income      |
| 00234 Highland Heights BC     | 2700 Alexandria Way          | Campbell County, KY | Highland Heights | KY    | 41076    | Brick & Mortar     | 2 - Moderate Income      |
| 00232 Newport Shopping Ctr BC | 110 Pavilion Parkway         | Campbell County, KY | Newport          | KY    | 41071    | Brick & Mortar     | 3 - Middle Income        |
| 00396 North Alexandria BC     | 6801 Alexandria Pike         | Campbell County, KY | Alexandria       | KY    | 41001    | Brick & Mortar     | 3 - Middle Income        |
| 00235 Ft Thomas BC            | 131 North Fort Thomas Avenue | Campbell County, KY | Fort Thomas      | KY    | 41075    | Brick & Mortar     | 4 - Upper Income         |
| 00898 Owensboro Downtown BC   | 500 Frederica Street         | Daviess County, KY  | Owensboro        | KY    | 42301    | Brick & Mortar     | 0 - Income Not Available |
| 00899 Owensboro South BC      | 3205 Frederica Street        | Daviess County, KY  | Owensboro        | KY    | 42301    | Brick & Mortar     | 3 - Middle Income        |
| 00359 Lexington BC            | 250 West Main Street         | Fayette County, KY  | Lexington        | KY    | 40507    | Brick & Mortar     | 0 - Income Not Available |
| 00993 Versailles Rd BC        | 2225 Versailles Road         | Fayette County, KY  | Lexington        | KY    | 40504    | Brick & Mortar     | 1 - Low Income           |

| Name                                | Address                     | County               | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------------|-----------------------------|----------------------|--------------|-------|----------|----------------|--------------------------|
| 00380 Bryan Station BC              | 1680 Bryan Station Road     | Fayette County, KY   | Lexington    | KY    | 40505    | Brick & Mortar | 2 - Moderate Income      |
| 00384 Tates Creek BC                | 3600 Walden Drive           | Fayette County, KY   | Lexington    | KY    | 40517    | Brick & Mortar | 2 - Moderate Income      |
| Citation Pointe BC                  | 2365 Remington Dr           | Fayette County, KY   | Lexington    | KY    | 40511    | Brick & Mortar | 3 - Middle Income        |
| 00379 Richmond Rd BC                | 3100 Richmond Road          | Fayette County, KY   | Lexington    | KY    | 40509    | Brick & Mortar | 3 - Middle Income        |
| 03861 Leestown Rd BC                | 1580 Leestown Road          | Fayette County, KY   | Lexington    | KY    | 40511    | Brick & Mortar | 3 - Middle Income        |
| 00378 Beaumont Ctr BC               | 3061 Harrodsburg Road       | Fayette County, KY   | Lexington    | KY    | 40513    | Brick & Mortar | 4 - Upper Income         |
| 00381 Nicholasville Rd BC           | 2295 Nicholasville Road     | Fayette County, KY   | Lexington    | KY    | 40503    | Brick & Mortar | 4 - Upper Income         |
| 00385 Hamburg Place BC              | 2051 Pleasant Ridge Drive   | Fayette County, KY   | Lexington    | KY    | 40509    | Brick & Mortar | 4 - Upper Income         |
| 01768 Chevy Chase BC                | 550 Euclid Avenue           | Fayette County, KY   | Lexington    | KY    | 40502    | Brick & Mortar | 4 - Upper Income         |
| 00565 Frankfort West BC             | 1269 US 127 South           | Franklin County, KY  | Frankfort    | KY    | 40601    | Brick & Mortar | 4 - Upper Income         |
| 00383 Cynthiana BC                  | 1005 US Highway 27 South    | Harrison County, KY  | Cynthiana    | KY    | 41031    | Brick & Mortar | 4 - Upper Income         |
| 04764 Henderson Downtown BC         | 300 2nd Street              | Henderson County, KY | Henderson    | KY    | 42420    | Brick & Mortar | 2 - Moderate Income      |
| 04799 Madisonville KY North Side BC | 1389 Whittington Drive      | Hopkins County, KY   | Madisonville | KY    | 42431    | Brick & Mortar | 3 - Middle Income        |
| Nulu Main BC                        | 750 E Jefferson St, Ste 100 | Jefferson County, KY | Louisville   | KY    | 40202    | Brick & Mortar | 1 - Low Income           |
| 00703 Broadway KY BC                | 1501 West Broadway          | Jefferson County, KY | Louisville   | KY    | 40203    | Brick & Mortar | 2 - Moderate Income      |
| 00887 Fourth and Central BC         | 3014 South 4th Street       | Jefferson County, KY | Louisville   | KY    | 40208    | Brick & Mortar | 2 - Moderate Income      |
| 00872 Bashford Manor BC             | 3603 Buechel Bypass         | Jefferson County, KY | Louisville   | KY    | 40218    | Brick & Mortar | 2 - Moderate Income      |
| 00884 Shively BC                    | 3901 Dixie Highway          | Jefferson County, KY | Louisville   | KY    | 40216    | Brick & Mortar | 2 - Moderate Income      |
| 00889 New Cut Rd BC                 | 5393 New Cut Road           | Jefferson County, KY | Louisville   | KY    | 40214    | Brick & Mortar | 2 - Moderate Income      |
| 04554 McMahan Plaza BC              | 3344 Hikes Lane             | Jefferson County, KY | Louisville   | KY    | 40220    | Brick & Mortar | 2 - Moderate Income      |



| Name                             | Address                          | County               | City         | State | Zip Code | Service Type       | Census Tract Income 2024 |
|----------------------------------|----------------------------------|----------------------|--------------|-------|----------|--------------------|--------------------------|
| 00892 Middletown BC              | 10400 Shelbyville Road           | Jefferson County, KY | Louisville   | KY    | 40223    | Brick & Mortar     | 3 - Middle Income        |
| 02933 Old Brownsboro Crossing BC | 4801 Norton Healthcare Boulevard | Jefferson County, KY | Louisville   | KY    | 40241    | Brick & Mortar     | 3 - Middle Income        |
| 00537 Poplar Level Rd BC         | 4201 Poplar Level Road           | Jefferson County, KY | Louisville   | KY    | 40213    | Brick & Mortar     | 3 - Middle Income        |
| 00880 Okolona BC                 | 8003 Preston Highway             | Jefferson County, KY | Louisville   | KY    | 40219    | Brick & Mortar     | 3 - Middle Income        |
| 00883 Dixie Highway BC           | 5200 Dixie Highway               | Jefferson County, KY | Louisville   | KY    | 40216    | Brick & Mortar     | 3 - Middle Income        |
| 01404 Hillview BC                | 11700 Antonia Way                | Jefferson County, KY | Louisville   | KY    | 40229    | Brick & Mortar     | 3 - Middle Income        |
| 04553 Southwest Station BC       | 9711 Dixie Highway               | Jefferson County, KY | Louisville   | KY    | 40272    | Brick & Mortar     | 3 - Middle Income        |
| 04631 Jeffersontown BC           | 1841 Blankenbaker Parkway        | Jefferson County, KY | Louisville   | KY    | 40299    | Brick & Mortar     | 3 - Middle Income        |
| 00862 Cedar Springs BM           | 6900 Bardstown Road              | Jefferson County, KY | Louisville   | KY    | 40291    | In-Store Bank Mart | 3 - Middle Income        |
| 00702 Brownsboro BC              | 2207 Holiday Manor Center        | Jefferson County, KY | Louisville   | KY    | 40222    | Brick & Mortar     | 4 - Upper Income         |
| 00836 Douglas Loop BC            | 2000 Bardstown Road              | Jefferson County, KY | Louisville   | KY    | 40205    | Brick & Mortar     | 4 - Upper Income         |
| Hurstbourne BC                   | 2900 N Hurstbourne Parkway       | Jefferson County, KY | Louisville   | KY    | 40241    | Brick & Mortar     | 4 - Upper Income         |
| 06374 Lake Forest KY BC          | 13904 Shelbyville Road           | Jefferson County, KY | Louisville   | KY    | 40245    | Brick & Mortar     | 4 - Upper Income         |
| 00821 Ruckriegel BC              | 3821 Ruckriegel Parkway          | Jefferson County, KY | Louisville   | KY    | 40299    | Brick & Mortar     | 4 - Upper Income         |
| 00888 St Matthews BC             | 4090 Shelbyville Road            | Jefferson County, KY | Louisville   | KY    | 40207    | Brick & Mortar     | 4 - Upper Income         |
| 00649 Prospect BM                | 5929 Timber Ridge Drive          | Jefferson County, KY | Prospect     | KY    | 40059    | In-Store Bank Mart | 4 - Upper Income         |
| 02415 Forest Springs BM          | 12450 LaGrange Road              | Jefferson County, KY | Louisville   | KY    | 40245    | In-Store Bank Mart | 4 - Upper Income         |
| 00390 Covington BC               | 107 West 4th Street              | Kenton County, KY    | Covington    | KY    | 41011    | Brick & Mortar     | 3 - Middle Income        |
| 04840 Independence BC            | 2064 Declaration Drive           | Kenton County, KY    | Independence | KY    | 41051    | Brick & Mortar     | 3 - Middle Income        |

| Name                      | Address                   | County               | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------|---------------------------|----------------------|------------------|-------|----------|----------------|--------------------------|
| 00391 Edgewood BC         | 3003 Dixie Highway        | Kenton County, KY    | Edgewood         | KY    | 41017    | Brick & Mortar | 4 - Upper Income         |
| 00392 Crescent Springs BC | 590 Buttermilk Pike       | Kenton County, KY    | Crescent Springs | KY    | 41017    | Brick & Mortar | 4 - Upper Income         |
| 01796 Highland Pike BC    | 1975 Highland Pike        | Kenton County, KY    | Fort Wright      | KY    | 41017    | Brick & Mortar | 4 - Upper Income         |
| 04786 Eddyville BC        | 418 Newman Drive          | Lyon County, KY      | Eddyville        | KY    | 42038    | Brick & Mortar | 4 - Upper Income         |
| 00991 Richmond BC         | 800 Eastern Bypass        | Madison County, KY   | Richmond         | KY    | 40475    | Brick & Mortar | 4 - Upper Income         |
| Buckner BC                | 3830 Commerce Parkway     | Oldham County, KY    | Lagrange         | KY    | 40031    | Brick & Mortar | 3 - Middle Income        |
| 00361 South Falmouth BC   | 280 Ridgeway Avenue       | Pendleton County, KY | Falmouth         | KY    | 41040    | Brick & Mortar | 2 - Moderate Income      |
| 03858 Georgetown KY BC    | 100 Lawson Drive          | Scott County, KY     | Georgetown       | KY    | 40324    | Brick & Mortar | 4 - Upper Income         |
| 00893 Shelbyville KY BC   | 300 Taylorsville Road     | Shelby County, KY    | Shelbyville      | KY    | 40065    | Brick & Mortar | 3 - Middle Income        |
| 04771 Morganfield BC      | 250 North Morgan Street   | Union County, KY     | Morganfield      | KY    | 42437    | Brick & Mortar | 3 - Middle Income        |
| 01602 Allegan Main BC     | 1511 Lincoln Road         | Allegan County, MI   | Allegan          | MI    | 49010    | Brick & Mortar | 3 - Middle Income        |
| 01710 Otsego BC           | 1282 M 89 Highway         | Allegan County, MI   | Plainwell        | MI    | 49080    | Brick & Mortar | 3 - Middle Income        |
| 05405 Elk Rapids BC       | 120 Ames Street           | Antrim County, MI    | Elk Rapids       | MI    | 49629    | Brick & Mortar | 4 - Upper Income         |
| 02940 Bay City BC         | 3870 State Street Road    | Bay County, MI       | Bay City         | MI    | 48706    | Brick & Mortar | 2 - Moderate Income      |
| 04726 Napier BC           | 1295 East Napier Avenue   | Berrien County, MI   | Benton Harbor    | MI    | 49022    | Brick & Mortar | 1 - Low Income           |
| 01703 Broadway MI BC      | 322 Broadway              | Berrien County, MI   | Niles            | MI    | 49120    | Brick & Mortar | 2 - Moderate Income      |
| 04703 St Joseph South BC  | 2915 South State Street   | Berrien County, MI   | Saint Joseph     | MI    | 49085    | Brick & Mortar | 3 - Middle Income        |
| 04710 Coloma BC           | 6553 Paw Paw Avenue       | Berrien County, MI   | Coloma           | MI    | 49038    | Brick & Mortar | 3 - Middle Income        |
| 04732 Sawyer BC           | 12912 Three Oaks Road     | Berrien County, MI   | Sawyer           | MI    | 49125    | Brick & Mortar | 3 - Middle Income        |
| 04720 Lakeshore BC        | 1788 West John Beers Road | Berrien County, MI   | Stevensville     | MI    | 49127    | Brick & Mortar | 4 - Upper Income         |

| Name                           | Address                        | County                    | City          | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------|--------------------------------|---------------------------|---------------|-------|----------|----------------|--------------------------|
| 04727 New Buffalo BC           | 1 West Buffalo Street          | Berrien County, MI        | New Buffalo   | MI    | 49117    | Brick & Mortar | 4 - Upper Income         |
| 01606 Battle Creek Capital BC  | 630 Capital Avenue Southwest   | Calhoun County, MI        | Battle Creek  | MI    | 49015    | Brick & Mortar | 1 - Low Income           |
| 01616 Dowagiac BC              | 205 South Front Street         | Cass County, MI           | Dowagiac      | MI    | 49047    | Brick & Mortar | 3 - Middle Income        |
| 01615 Dewitt BC                | 13007 South US Highway 27      | Clinton County, MI        | Dewitt        | MI    | 48820    | Brick & Mortar | 3 - Middle Income        |
| 01724 St Johns BC              | 1204 South US 27               | Clinton County, MI        | Saint Johns   | MI    | 48879    | Brick & Mortar | 3 - Middle Income        |
| 01627 Grand Ledge BC           | 900 Charlevoix Drive           | Eaton County, MI          | Grand Ledge   | MI    | 48837    | Brick & Mortar | 3 - Middle Income        |
| 01695 West Lansing BC          | 5117 West Saginaw Highway      | Eaton County, MI          | Lansing       | MI    | 48917    | Brick & Mortar | 3 - Middle Income        |
| 05415 Petoskey BC              | 300 East Mitchell              | Emmet County, MI          | Petoskey      | MI    | 49770    | Brick & Mortar | 3 - Middle Income        |
| 02941 Beecher and Ballenger BC | 700 South Ballenger Highway    | Genesee County, MI        | Flint         | MI    | 48532    | Brick & Mortar | 3 - Middle Income        |
| 05163 Miller Rd BC             | 5232 Miller Road               | Genesee County, MI        | Flint         | MI    | 48507    | Brick & Mortar | 3 - Middle Income        |
| 05168 Grand Blanc BC           | 12900 South Saginaw            | Genesee County, MI        | Grand Blanc   | MI    | 48439    | Brick & Mortar | 3 - Middle Income        |
| 05944 Center Road BC           | 2315 South Center Road         | Genesee County, MI        | Burton        | MI    | 48519    | Brick & Mortar | 3 - Middle Income        |
| 05157 Fenton BC                | 1231 North Leroy Street        | Genesee County, MI        | Fenton        | MI    | 48430    | Brick & Mortar | 4 - Upper Income         |
| 05422 Holiday Hills BC         | 2425 Holiday Road              | Grand Traverse County, MI | Traverse City | MI    | 49686    | Brick & Mortar | 3 - Middle Income        |
| US 31 SouthTemporary BC        | 3500 Marketplace Circle        | Grand Traverse County, MI | Traverse City | MI    | 49684    | Brick & Mortar | 3 - Middle Income        |
| 05421 Grand Traverse BC        | 102 West Front Street          | Grand Traverse County, MI | Traverse City | MI    | 49684    | Brick & Mortar | 4 - Upper Income         |
| 01666 Hillsdale-Main BC        | 10 South Broad Street          | Hillsdale County, MI      | Hillsdale     | MI    | 49242    | Brick & Mortar | 3 - Middle Income        |
| 01693 S Pennsylvania BC        | 5620 South Pennsylvania Avenue | Ingham County, MI         | Lansing       | MI    | 48911    | Brick & Mortar | 2 - Moderate Income      |
| 01702 Mason MI BC              | 606 West Columbia              | Ingham County, MI         | Mason         | MI    | 48854    | Brick & Mortar | 3 - Middle Income        |

| Name                             | Address                         | County               | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|----------------------------------|---------------------------------|----------------------|----------------|-------|----------|----------------|--------------------------|
| 01617 East Lansing BC            | 1427 West Saginaw Street        | Ingham County, MI    | East Lansing   | MI    | 48823    | Brick & Mortar | 4 - Upper Income         |
| 01708 Okemos BC                  | 4815 Okemos Road                | Ingham County, MI    | Okemos         | MI    | 48864    | Brick & Mortar | 4 - Upper Income         |
| 06293 Mt Pleasant MI BC          | 1114 North Mission              | Isabella County, MI  | Mount Pleasant | MI    | 48858    | Brick & Mortar | 3 - Middle Income        |
| 01517 Argyle/Wisner BC           | 1190 West Argyle                | Jackson County, MI   | Jackson        | MI    | 49202    | Brick & Mortar | 3 - Middle Income        |
| 01682 Gull Rd BC                 | 5653 Gull Road                  | Kalamazoo County, MI | Kalamazoo      | MI    | 49048    | Brick & Mortar | 2 - Moderate Income      |
| 01715 Westnedge at Crossroads BC | 6488 South Westnedge Avenue     | Kalamazoo County, MI | Portage        | MI    | 49002    | Brick & Mortar | 2 - Moderate Income      |
| 01687 Westwood BC                | 4705 West Main Street           | Kalamazoo County, MI | Kalamazoo      | MI    | 49006    | Brick & Mortar | 3 - Middle Income        |
| 02970 Oshtemo BC                 | 6040 Stadium Drive              | Kalamazoo County, MI | Kalamazoo      | MI    | 49009    | Brick & Mortar | 3 - Middle Income        |
| 01683 Kalamazoo Main BC          | 136 East Michigan Avenue        | Kalamazoo County, MI | Kalamazoo      | MI    | 49007    | Brick & Mortar | 4 - Upper Income         |
| 01717 Woodbridge BC              | 3500 West Centre Avenue         | Kalamazoo County, MI | Portage        | MI    | 49024    | Brick & Mortar | 4 - Upper Income         |
| 01647 Franklin-Eastern BC        | 754 Martin Luther King Jr St SE | Kent County, MI      | Grand Rapids   | MI    | 49507    | Brick & Mortar | 1 - Low Income           |
| 01614 Westgate MI BC             | 3980 Alpine Avenue Northwest    | Kent County, MI      | Comstock Park  | MI    | 49321    | Brick & Mortar | 2 - Moderate Income      |
| 01633 Alpine BC                  | 805 Leonard Street Northwest    | Kent County, MI      | Grand Rapids   | MI    | 49504    | Brick & Mortar | 2 - Moderate Income      |
| 01641 54th and Division BC       | 62 54th Street                  | Kent County, MI      | Wyoming        | MI    | 49548    | Brick & Mortar | 2 - Moderate Income      |
| 01651 Helms Ctr BC               | 3785 Plainfield NE              | Kent County, MI      | Grand Rapids   | MI    | 49525    | Brick & Mortar | 2 - Moderate Income      |
| 01735 Wyoming MI BC              | 2828 Michael Avenue Southwest   | Kent County, MI      | Wyoming        | MI    | 49509    | Brick & Mortar | 2 - Moderate Income      |
| 01636 Callander-44th BC          | 2065 44th Street Southeast      | Kent County, MI      | Grand Rapids   | MI    | 49508    | Brick & Mortar | 3 - Middle Income        |
| 01642 Eastbrook BC               | 3715 28th Street Southeast      | Kent County, MI      | Grand Rapids   | MI    | 49512    | Brick & Mortar | 3 - Middle Income        |
| 01701 Lowell BC                  | 11915 Fulton Street East        | Kent County, MI      | Lowell         | MI    | 49331    | Brick & Mortar | 3 - Middle Income        |
| 01632 Kentwood BC                | 6210 Kalamazoo Avenue Southeast | Kent County, MI      | Kentwood       | MI    | 49508    | Brick & Mortar | 3 - Middle Income        |

| Name                       | Address                             | County                | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|----------------------------|-------------------------------------|-----------------------|--------------|-------|----------|----------------|--------------------------|
| 01655 Northland Drive BC   | 5400 Northland Drive Northeast      | Kent County, MI       | Grand Rapids | MI    | 49525    | Brick & Mortar | 3 - Middle Income        |
| 04588 Byron BC             | 2384 84th Street Southwest          | Kent County, MI       | Byron Center | MI    | 49315    | Brick & Mortar | 3 - Middle Income        |
| 01458 Gezon Parkway BC     | 2301 Gezon Parkway Southwest        | Kent County, MI       | Wyoming      | MI    | 49519    | Brick & Mortar | 3 - Middle Income        |
| 01661 Alger Heights BC     | 2456 Eastern Avenue                 | Kent County, MI       | Grand Rapids | MI    | 49507    | Brick & Mortar | 3 - Middle Income        |
| 01662 Standale BC          | 4520 Lake Michigan Drive            | Kent County, MI       | Grand Rapids | MI    | 49534    | Brick & Mortar | 3 - Middle Income        |
| 01664 Wilson-44th BC       | 4460 Wilson Avenue Southwest        | Kent County, MI       | Grandville   | MI    | 49418    | Brick & Mortar | 3 - Middle Income        |
| 01600 Ada BC               | 475 Ada Drive Southeast             | Kent County, MI       | Ada          | MI    | 49301    | Brick & Mortar | 4 - Upper Income         |
| 01637 Cascade BC           | 6485 28th Street Southeast          | Kent County, MI       | Grand Rapids | MI    | 49546    | Brick & Mortar | 4 - Upper Income         |
| 01645 Forest Hills BC      | 4460 Cascade Road Southeast         | Kent County, MI       | Grand Rapids | MI    | 49546    | Brick & Mortar | 4 - Upper Income         |
| 01652 Knapp Corners BC     | 1967 East Beltline Avenue Northeast | Kent County, MI       | Grand Rapids | MI    | 49525    | Brick & Mortar | 4 - Upper Income         |
| 01611 Caledonia BC         | 9325 Cherry Valley Avenue Southeast | Kent County, MI       | Caledonia    | MI    | 49316    | Brick & Mortar | 4 - Upper Income         |
| 01634 Breton Village BC    | 2465 Burton Street SE               | Kent County, MI       | Grand Rapids | MI    | 49546    | Brick & Mortar | 4 - Upper Income         |
| 01650 Grand Rapids Main BC | 111 Lyon Street Northwest           | Kent County, MI       | Grand Rapids | MI    | 49503    | Brick & Mortar | 4 - Upper Income         |
| 01654 Michigan-Fuller BC   | 1319 Michigan Street Northeast      | Kent County, MI       | Grand Rapids | MI    | 49503    | Brick & Mortar | 4 - Upper Income         |
| 02934 Rockford West BC     | 2805 Ten Mile Road                  | Kent County, MI       | Rockford     | MI    | 49341    | Brick & Mortar | 4 - Upper Income         |
| 05417 Suttons Bay BC       | 120 North Saint Joseph Street       | Leelanau County, MI   | Suttons Bay  | MI    | 49682    | Brick & Mortar | 4 - Upper Income         |
| 05106 Brighton BC          | 265 W Main St                       | Livingston County, MI | Brighton     | MI    | 48116    | Brick & Mortar | 2 - Moderate Income      |
| 05173 Hamburg BC           | 7500 East M 36                      | Livingston County, MI | Hamburg      | MI    | 48139    | Brick & Mortar | 2 - Moderate Income      |
| 05175 Howell BC            | 3866 East Grand River Avenue        | Livingston County, MI | Howell       | MI    | 48843    | Brick & Mortar | 3 - Middle Income        |

| Name                          | Address                       | County                | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------|-------------------------------|-----------------------|------------------|-------|----------|----------------|--------------------------|
| 05108 Grand River BC          | 10011 East Grand River Avenue | Livingston County, MI | Brighton         | MI    | 48116    | Brick & Mortar | 4 - Upper Income         |
| 05183 North Ave BC            | 100 Cass Avenue               | Macomb County, MI     | Mount Clemens    | MI    | 48043    | Brick & Mortar | 2 - Moderate Income      |
| 02921 Roseville Eastpointe BC | 25950 Gratiot Avenue          | Macomb County, MI     | Roseville        | MI    | 48066    | Brick & Mortar | 2 - Moderate Income      |
| 05138 15 and Gratiot BC       | 35275 Gratiot Avenue          | Macomb County, MI     | Clinton Township | MI    | 48035    | Brick & Mortar | 2 - Moderate Income      |
| 07357 Warren BC               | 30700 Van Dyke Avenue         | Macomb County, MI     | Warren           | MI    | 48093    | Brick & Mortar | 2 - Moderate Income      |
| 05103 Armada BC               | 74195 Fulton Street           | Macomb County, MI     | Armada           | MI    | 48005    | Brick & Mortar | 3 - Middle Income        |
| 05132 Chesterfield BC         | 47000 Gratiot Avenue          | Macomb County, MI     | Chesterfield     | MI    | 48051    | Brick & Mortar | 3 - Middle Income        |
| Hall Road BC                  | 18276 Hall Rd.                | Macomb County, MI     | Clinton Township | MI    | 48038    | Brick & Mortar | 3 - Middle Income        |
| 05141 Hayes BC                | 40980 Hayes Road              | Macomb County, MI     | Clinton Township | MI    | 48038    | Brick & Mortar | 3 - Middle Income        |
| Hall and Schoenherr BC        | 13741 Hall Road               | Macomb County, MI     | Shelby Twp       | MI    | 48315    | Brick & Mortar | 3 - Middle Income        |
| 05061 18 and Ryan BC          | 41122 Ryan Road               | Macomb County, MI     | Sterling Heights | MI    | 48314    | Brick & Mortar | 3 - Middle Income        |
| 05216 Dodge Park BC           | 11555 Sixteen Mile Road       | Macomb County, MI     | Sterling Heights | MI    | 48312    | Brick & Mortar | 3 - Middle Income        |
| 05193 Romeo BC                | 67855 Van Dyke Avenue         | Macomb County, MI     | Washington       | MI    | 48095    | Brick & Mortar | 4 - Upper Income         |
| 05196 Shelby MI BC            | 13555 23 Mile Road            | Macomb County, MI     | Shelby Township  | MI    | 48315    | Brick & Mortar | 4 - Upper Income         |
| 05197 Van Dyke and 25 BC      | 54985 Van Dyke Avenue         | Macomb County, MI     | Shelby Township  | MI    | 48316    | Brick & Mortar | 4 - Upper Income         |
| 05411 Ludington BC            | 5870 West US 10               | Mason County, MI      | Ludington        | MI    | 49431    | Brick & Mortar | 3 - Middle Income        |
| 05401 Big Rapids BC           | 101 North Michigan            | Mecosta County, MI    | Big Rapids       | MI    | 49307    | Brick & Mortar | 2 - Moderate Income      |
| 06657 Midland MI BC           | 321 South Saginaw Road        | Midland County, MI    | Midland          | MI    | 48640    | Brick & Mortar | 2 - Moderate Income      |
| 00944 Monroe Downtown BC      | 453 South Monroe Street       | Monroe County, MI     | Monroe           | MI    | 48161    | Brick & Mortar | 2 - Moderate Income      |
| 00933 North Monroe BC         | 2133 North Telegraph Road     | Monroe County, MI     | Monroe           | MI    | 48162    | Brick & Mortar | 3 - Middle Income        |

| Name                           | Address                         | County              | City          | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------|---------------------------------|---------------------|---------------|-------|----------|----------------|--------------------------|
| 00947 Lambertville BC          | 3559 West Sterns Road           | Monroe County, MI   | Lambertville  | MI    | 48144    | Brick & Mortar | 4 - Upper Income         |
| 01665 Greenville BC            | 410 South Greenville West Drive | Montcalm County, MI | Greenville    | MI    | 48838    | Brick & Mortar | 2 - Moderate Income      |
| Harvey Street BC               | 5217 Harvey Street              | Muskegon County, MI | Muskegon      | MI    | 49444    | Brick & Mortar | 2 - Moderate Income      |
| 01706 Seminole Rd BC           | 710 Seminole Road               | Muskegon County, MI | Norton Shores | MI    | 49441    | Brick & Mortar | 3 - Middle Income        |
| 04601 North Muskegon BC        | 621 Dykstra Road                | Muskegon County, MI | Muskegon      | MI    | 49445    | Brick & Mortar | 3 - Middle Income        |
| 04602 Apple Avenue BC          | 1945 East Apple Avenue          | Muskegon County, MI | Muskegon      | MI    | 49442    | Brick & Mortar | 3 - Middle Income        |
| 01621 Fremont BC               | 55 West Main Street             | Newaygo County, MI  | Fremont       | MI    | 49412    | Brick & Mortar | 3 - Middle Income        |
| 04333 Wixom BC                 | 49895 Grand River Avenue        | Oakland County, MI  | Wixom         | MI    | 48393    | Brick & Mortar | 1 - Low Income           |
| 05188 Pontiac BC               | 442 West Huron                  | Oakland County, MI  | Pontiac       | MI    | 48341    | Brick & Mortar | 1 - Low Income           |
| 51312 Greenfield BC            | 23633 Greenfield                | Oakland County, MI  | Southfield    | MI    | 48075    | Brick & Mortar | 2 - Moderate Income      |
| 02922 Waterford BC             | 4370 Highland Road              | Oakland County, MI  | Waterford     | MI    | 48328    | Brick & Mortar | 2 - Moderate Income      |
| 05221 Beck Road BC             | 31125 Beck Road                 | Oakland County, MI  | Novi          | MI    | 48377    | Brick & Mortar | 2 - Moderate Income      |
| 05198 Southfield BC            | 27255 Lahser Road               | Oakland County, MI  | Southfield    | MI    | 48034    | Brick & Mortar | 3 - Middle Income        |
| 05122 Clarkston BC             | 6500 Dixie Highway              | Oakland County, MI  | Clarkston     | MI    | 48346    | Brick & Mortar | 3 - Middle Income        |
| 51304 Orion Township BC        | 4491 Interpark                  | Oakland County, MI  | Auburn Hills  | MI    | 48326    | Brick & Mortar | 3 - Middle Income        |
| 01207 Troy Bishop BC           | 3754 Rochester Road             | Oakland County, MI  | Troy          | MI    | 48083    | Brick & Mortar | 3 - Middle Income        |
| 05181 Milford MI BC            | 115 East Liberty                | Oakland County, MI  | Milford       | MI    | 48381    | Brick & Mortar | 3 - Middle Income        |
| 05354 Highland Town Ctr BC     | 411 Town Center Drive           | Oakland County, MI  | Highland      | MI    | 48356    | Brick & Mortar | 3 - Middle Income        |
| 01843 Royal Oak Main Street BC | 803 South Main Street           | Oakland County, MI  | Royal Oak     | MI    | 48067    | Brick & Mortar | 4 - Upper Income         |
| 06360 Royal Oak BC             | 29710 Woodward Avenue           | Oakland County, MI  | Royal Oak     | MI    | 48073    | Brick & Mortar | 4 - Upper Income         |

| Name                                | Address                   | County                | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------------|---------------------------|-----------------------|------------------|-------|----------|----------------|--------------------------|
| 06414 Farmington Hills BC           | 33133 West 12 Mile Road   | Oakland County, MI    | Farmington Hills | MI    | 48334    | Brick & Mortar | 4 - Upper Income         |
| 00437 Telegraph and Maple BC        | 6801 Telegraph Road       | Oakland County, MI    | Bloomfield Hills | MI    | 48301    | Brick & Mortar | 4 - Upper Income         |
| 05144 Haggerty and Pontiac Trail BC | 4747 Haggerty Road        | Oakland County, MI    | West Bloomfield  | MI    | 48323    | Brick & Mortar | 4 - Upper Income         |
| 05220 Troy BC                       | 2282 West Big Beaver Road | Oakland County, MI    | Troy             | MI    | 48084    | Brick & Mortar | 4 - Upper Income         |
| 06416 Rochester Hills North BC      | 1383 S Rochester Road     | Oakland County, MI    | Rochester Hills  | MI    | 48307    | Brick & Mortar | 4 - Upper Income         |
| 07358 West Bloomfield BC            | 31700 14 Mile Road        | Oakland County, MI    | West Bloomfield  | MI    | 48322    | Brick & Mortar | 4 - Upper Income         |
| 04600 Hart BC                       | 424 South State Street    | Oceana County, MI     | Hart             | MI    | 49420    | Brick & Mortar | 3 - Middle Income        |
| 05408 Gaylord BC                    | 123 West Main Street      | Otsego County, MI     | Gaylord          | MI    | 49735    | Brick & Mortar | 2 - Moderate Income      |
| 01620 Ferrysburg BC                 | 100 3rd Street            | Ottawa County, MI     | Ferrysburg       | MI    | 49409    | Brick & Mortar | 0 - Income Not Available |
| 01667 Southside BC                  | 757 Michigan Avenue       | Ottawa County, MI     | Holland          | MI    | 49423    | Brick & Mortar | 2 - Moderate Income      |
| 04583 Butternut Drive BC            | 403 Butternut Drive       | Ottawa County, MI     | Holland          | MI    | 49424    | Brick & Mortar | 2 - Moderate Income      |
| 01626 Robbins Rd BC                 | 839 Robbins Road          | Ottawa County, MI     | Grand Haven      | MI    | 49417    | Brick & Mortar | 3 - Middle Income        |
| 01668 Eastside BC                   | 800 East 16th Street      | Ottawa County, MI     | Holland          | MI    | 49423    | Brick & Mortar | 3 - Middle Income        |
| 01673 Riley St BC                   | 12443 Riley Street        | Ottawa County, MI     | Holland          | MI    | 49424    | Brick & Mortar | 3 - Middle Income        |
| 01676 Jenison BC                    | 530 Baldwin Street        | Ottawa County, MI     | Jenison          | MI    | 49428    | Brick & Mortar | 3 - Middle Income        |
| 04584 Zeeland West BC               | 523 West Main Avenue      | Ottawa County, MI     | Zeeland          | MI    | 49464    | Brick & Mortar | 3 - Middle Income        |
| 01674 Hudsonville BC                | 2855 Port Sheldon Street  | Ottawa County, MI     | Hudsonville      | MI    | 49426    | Brick & Mortar | 4 - Upper Income         |
| 00523 Tittabawassee Rd BC           | 3390 Tittabawassee Road   | Saginaw County, MI    | Saginaw          | MI    | 48604    | Brick & Mortar | 3 - Middle Income        |
| 05150 Corunna BC                    | 2350 East M 21            | Shiawassee County, MI | Owosso           | MI    | 48867    | Brick & Mortar | 2 - Moderate Income      |
| 05187 Owosso BC                     | 123 North Washington      | Shiawassee County, MI | Owosso           | MI    | 48867    | Brick & Mortar | 2 - Moderate Income      |



| Name                                 | Address                     | County                | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------------|-----------------------------|-----------------------|--------------|-------|----------|----------------|--------------------------|
| 05155 Durand BC                      | 5300 South Durand Road      | Shiawassee County, MI | Durand       | MI    | 48429    | Brick & Mortar | 3 - Middle Income        |
| 05178 Marine City BC                 | 6770 South River Road       | St. Clair County, MI  | Marine City  | MI    | 48039    | Brick & Mortar | 2 - Moderate Income      |
| 05190 Wadhams BC                     | 5314 Lapeer Road            | St. Clair County, MI  | Kimball      | MI    | 48074    | Brick & Mortar | 2 - Moderate Income      |
| 05156 Fair Haven BC                  | 8920 Dixie Highway          | St. Clair County, MI  | Fair Haven   | MI    | 48023    | Brick & Mortar | 3 - Middle Income        |
| 05165 Ft Gratiot BC                  | 3846 Pine Grove             | St. Clair County, MI  | Fort Gratiot | MI    | 48059    | Brick & Mortar | 3 - Middle Income        |
| 05180 Marysville MI BC               | 3300 Gratiot Avenue         | St. Clair County, MI  | Marysville   | MI    | 48040    | Brick & Mortar | 3 - Middle Income        |
| 05212 St Clair BC                    | 200 South Riverside Avenue  | St. Clair County, MI  | Saint Clair  | MI    | 48079    | Brick & Mortar | 3 - Middle Income        |
| 01728 Three Rivers Main BC           | 216 North Main Street       | St. Joseph County, MI | Three Rivers | MI    | 49093    | Brick & Mortar | 3 - Middle Income        |
| 01722 South Haven BC                 | 601 Phoenix Street          | Van Buren County, MI  | South Haven  | MI    | 49090    | Brick & Mortar | 4 - Upper Income         |
| 00659 Ypsilanti Township BC          | 1940 Whittaker Road         | Washtenaw County, MI  | Ypsilanti    | MI    | 48197    | Brick & Mortar | 3 - Middle Income        |
| 01163 Ann Arbor West BC              | 2090 West Stadium Boulevard | Washtenaw County, MI  | Ann Arbor    | MI    | 48103    | Brick & Mortar | 4 - Upper Income         |
| 01835 Ann Arbor South East BC        | 3315 Washtenaw Avenue       | Washtenaw County, MI  | Ann Arbor    | MI    | 48104    | Brick & Mortar | 4 - Upper Income         |
| 01833 7 Mile and Telegraph BC        | 19111 Telegraph Road        | Wayne County, MI      | Detroit      | MI    | 48219    | Brick & Mortar | 1 - Low Income           |
| 05351 Detroit East Jefferson BC      | 3201 East Jefferson         | Wayne County, MI      | Detroit      | MI    | 48207    | Brick & Mortar | 1 - Low Income           |
| 01815 Detroit Eastside BC            | 14820 Gratiot Avenue        | Wayne County, MI      | Detroit      | MI    | 48205    | Brick & Mortar | 2 - Moderate Income      |
| 51315 Northwest Activities Center BC | 18100 Meyers Road           | Wayne County, MI      | Detroit      | MI    | 48235    | Brick & Mortar | 2 - Moderate Income      |
| 01196 East Dearborn BC               | 7041 Schaefer Road          | Wayne County, MI      | Dearborn     | MI    | 48126    | Brick & Mortar | 2 - Moderate Income      |
| 05158 Flat Rock BC                   | 28725 Telegraph Road        | Wayne County, MI      | Flat Rock    | MI    | 48134    | Brick & Mortar | 3 - Middle Income        |
| 05166 Gibraltar BC                   | 20399 Gibraltar Road        | Wayne County, MI      | Brownstown   | MI    | 48183    | Brick & Mortar | 3 - Middle Income        |

| Name                            | Address                    | County               | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------------|----------------------------|----------------------|----------------|-------|----------|----------------|--------------------------|
| 05191 Riverview BC              | 17825 Fort Street          | Wayne County, MI     | Riverview      | MI    | 48193    | Brick & Mortar | 3 - Middle Income        |
| 05217 Taylor BC                 | 9691 Telegraph Road        | Wayne County, MI     | Taylor         | MI    | 48180    | Brick & Mortar | 3 - Middle Income        |
| 00552 8 Mile Livernois BC       | 3927 West Eight Mile Road  | Wayne County, MI     | Detroit        | MI    | 48221    | Brick & Mortar | 4 - Upper Income         |
| 01804 Grosse Pointe The Hill BC | 66 Kercheval               | Wayne County, MI     | Grosse Pointe  | MI    | 48236    | Brick & Mortar | 4 - Upper Income         |
| 02927 Grosse Pointe Woods BC    | 20065 Mack Avenue          | Wayne County, MI     | Grosse Pointe  | MI    | 48236    | Brick & Mortar | 4 - Upper Income         |
| 01805 Canton Ford Road BC       | 43710 Ford Road            | Wayne County, MI     | Canton         | MI    | 48187    | Brick & Mortar | 4 - Upper Income         |
| 04334 8 Mile and Haggerty BC    | 20205 Haggerty Road        | Wayne County, MI     | Northville     | MI    | 48167    | Brick & Mortar | 4 - Upper Income         |
| 05115 Plymouth BC               | 42370 Ann Arbor Road       | Wayne County, MI     | Plymouth       | MI    | 48170    | Brick & Mortar | 4 - Upper Income         |
| 05177 Livonia BC                | 33246 Plymouth Road        | Wayne County, MI     | Livonia        | MI    | 48150    | Brick & Mortar | 4 - Upper Income         |
| 05219 West Chelsea BC           | 2040 West Road             | Wayne County, MI     | Trenton        | MI    | 48183    | Brick & Mortar | 4 - Upper Income         |
| 05224 West and Hall BC          | 22990 Hall Road            | Wayne County, MI     | Woodhaven      | MI    | 48183    | Brick & Mortar | 4 - Upper Income         |
| 07356 Dearborn BC               | 1620 North Telegraph       | Wayne County, MI     | Dearborn       | MI    | 48128    | Brick & Mortar | 4 - Upper Income         |
| 05403 Cadillac BC               | 123 South Mitchell         | Wexford County, MI   | Cadillac       | MI    | 49601    | Brick & Mortar | 2 - Moderate Income      |
| 47342 Sparta BC                 | 406 South Main Street      | Alleghany County, NC | Sparta         | NC    | 28675    | Brick & Mortar | 2 - Moderate Income      |
| 47341 West Jefferson BC         | 402 South Jefferson Avenue | Ashe County, NC      | West Jefferson | NC    | 28694    | Brick & Mortar | 3 - Middle Income        |
| 47343 Banner Elk BC             | 1667 Tynecastle Highway    | Avery County, NC     | Banner Elk     | NC    | 28604    | Brick & Mortar | 3 - Middle Income        |
| 47344 Black Mountain BC         | 128 Montreat Road          | Buncombe County, NC  | Black Mountain | NC    | 28711    | Brick & Mortar | 3 - Middle Income        |
| 47322 Kannapolis Main BC        | 606 South Main Street      | Cabarrus County, NC  | Kannapolis     | NC    | 28081    | Brick & Mortar | 1 - Low Income           |
| 47318 Concord Main BC           | 40 Cabarrus Avenue East    | Cabarrus County, NC  | Concord        | NC    | 28025    | Brick & Mortar | 2 - Moderate Income      |
| 47320 Highway 29 BC             | 981 Concord Parkway South  | Cabarrus County, NC  | Concord        | NC    | 28027    | Brick & Mortar | 2 - Moderate Income      |

| Name                        | Address                        | County                 | City        | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-----------------------------|--------------------------------|------------------------|-------------|-------|----------|----------------|--------------------------|
| 47323 Harrisburg BC         | 4725 Highway 49 South          | Cabarrus County, NC    | Harrisburg  | NC    | 28075    | Brick & Mortar | 4 - Upper Income         |
| 47324 Midland NC BC         | 4411 Highway 24 27 East        | Cabarrus County, NC    | Midland     | NC    | 28107    | Brick & Mortar | 4 - Upper Income         |
| 47347 Maiden BC             | 5692 NC Highway 150 East       | Catawba County, NC     | Maiden      | NC    | 28650    | Brick & Mortar | 3 - Middle Income        |
| 47337 Shelby NC BC          | 316 South Lafayette Street     | Cleveland County, NC   | Shelby      | NC    | 28150    | Brick & Mortar | 1 - Low Income           |
| South Square BC             | 4200 University Drive          | Durham County, NC      | Durham      | NC    | 27707    | Brick & Mortar | 3 - Middle Income        |
| Hope Valley BC              | 1133 West NC-54                | Durham County, NC      | Durham      | NC    | 27707    | Brick & Mortar | 3 - Middle Income        |
| 47332 Mooresville Main BC   | 329 North Main Street          | Iredell County, NC     | Mooresville | NC    | 28115    | Brick & Mortar | 2 - Moderate Income      |
| 47333 Port Village BC       | 141 Williamson Rd.             | Iredell County, NC     | Mooresville | NC    | 28117    | Brick & Mortar | 3 - Middle Income        |
| Flowers BC                  | 55 District Way                | Johnston County, NC    | Clayton     | NC    | 27527    | Brick & Mortar | 3 - Middle Income        |
| 47326 Lincolnton Main BC    | 402 East Main Street           | Lincoln County, NC     | Lincolnton  | NC    | 28092    | Brick & Mortar | 2 - Moderate Income      |
| 47328 Waterside Crossing BC | 7471 Eastcross Drive           | Lincoln County, NC     | Denver      | NC    | 28037    | Brick & Mortar | 4 - Upper Income         |
| Historic West End BC        | 2340 Beatties Ford Rd.         | Mecklenburg County, NC | Charlotte   | NC    | 28216    | Brick & Mortar | 1 - Low Income           |
| Eastway Crossing BC         | 3130 Eastway Drive             | Mecklenburg County, NC | Charlotte   | NC    | 28205    | Brick & Mortar | 1 - Low Income           |
| 47301 Sunset BC             | 5330 Sunset Road               | Mecklenburg County, NC | Charlotte   | NC    | 28269    | Brick & Mortar | 2 - Moderate Income      |
| 47308 Eastland NC BC        | 5601 Reddman Road              | Mecklenburg County, NC | Charlotte   | NC    | 28212    | Brick & Mortar | 2 - Moderate Income      |
| 47312 Matthews BC           | 1818 Matthews Township Parkway | Mecklenburg County, NC | Matthews    | NC    | 28105    | Brick & Mortar | 2 - Moderate Income      |
| 47363 Wilkinson BC          | 2752 Ashley Road               | Mecklenburg County, NC | Charlotte   | NC    | 28208    | Brick & Mortar | 2 - Moderate Income      |
| Sardis BC                   | 1608 Galleria Blvd.            | Mecklenburg County, NC | Charlotte   | NC    | 28270    | Brick & Mortar | 2 - Moderate Income      |
| Woodlawn BC                 | 355 East Woodlawn Rd.          | Mecklenburg County, NC | Charlotte   | NC    | 28217    | Brick & Mortar | 2 - Moderate Income      |
| South End BC                | 1800 Camden Rd                 | Mecklenburg County, NC | Charlotte   | NC    | 28203    | Brick & Mortar | 2 - Moderate Income      |

| Name                                  | Address                        | County                 | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------------------|--------------------------------|------------------------|--------------|-------|----------|----------------|--------------------------|
| 47302 Mallard Creek BC                | 10400 Mallard Creek Road       | Mecklenburg County, NC | Charlotte    | NC    | 28262    | Brick & Mortar | 3 - Middle Income        |
| 47306 University NC BC                | 8601 J M Keynes Drive          | Mecklenburg County, NC | Charlotte    | NC    | 28262    | Brick & Mortar | 3 - Middle Income        |
| 47431 Brooklyn Village BC             | 450 E Brooklyn Village Avenue  | Mecklenburg County, NC | Charlotte    | NC    | 28202    | Brick & Mortar | 3 - Middle Income        |
| 47316 Huntersville BC                 | 500 Gilead Road                | Mecklenburg County, NC | Huntersville | NC    | 28078    | Brick & Mortar | 3 - Middle Income        |
| 47670 Berewick BC                     | 4840 Berewick Town Center      | Mecklenburg County, NC | Charlotte    | NC    | 28278    | Brick & Mortar | 4 - Upper Income         |
| 47300 Fifth Third Center Charlotte BC | 201 North Tryon Street         | Mecklenburg County, NC | Charlotte    | NC    | 28202    | Brick & Mortar | 4 - Upper Income         |
| 47310 Mint Hill BC                    | 7116 Matthews Mint Hill Road   | Mecklenburg County, NC | Mint Hill    | NC    | 28227    | Brick & Mortar | 4 - Upper Income         |
| 47313 Cornelius BC                    | 20301 West Catawba Avenue      | Mecklenburg County, NC | Cornelius    | NC    | 28031    | Brick & Mortar | 4 - Upper Income         |
| 47314 Davidson BC                     | 124 South Main Street          | Mecklenburg County, NC | Davidson     | NC    | 28036    | Brick & Mortar | 4 - Upper Income         |
| 47317 Birkdale Village BC             | 16719 Birkdale Commons Parkway | Mecklenburg County, NC | Huntersville | NC    | 28078    | Brick & Mortar | 4 - Upper Income         |
| Magnolia Plaza BC                     | 19212 W Catawba Ave            | Mecklenburg County, NC | Cornelius    | NC    | 28031    | Brick & Mortar | 4 - Upper Income         |
| Waverly South BC                      | 6361 Ardrey Kell Rd.           | Mecklenburg County, NC | Charlotte    | NC    | 28277    | Brick & Mortar | 4 - Upper Income         |
| 47305 Cotswold BC                     | 225 South Sharon Amity Road    | Mecklenburg County, NC | Charlotte    | NC    | 28211    | Brick & Mortar | 4 - Upper Income         |
| 47307 Carmel Road BC                  | 7530 Pineville Matthews Road   | Mecklenburg County, NC | Charlotte    | NC    | 28226    | Brick & Mortar | 4 - Upper Income         |
| 47311 Park Road BC                    | 1625 East Woodlawn Road        | Mecklenburg County, NC | Charlotte    | NC    | 28209    | Brick & Mortar | 4 - Upper Income         |
| Ballantyne BC                         | 11206 Providence Road West     | Mecklenburg County, NC | Charlotte    | NC    | 28277    | Brick & Mortar | 4 - Upper Income         |
| New Bern Station BC                   | 2822 South Blvd.               | Mecklenburg County, NC | Charlotte    | NC    | 28209    | Brick & Mortar | 4 - Upper Income         |
| Blakeney BC                           | 9034 Ardrey Kell Rd.           | Mecklenburg County, NC | Charlotte    | NC    | 28277    | Brick & Mortar | 4 - Upper Income         |
| Myers Park BC                         | 915 Providence Road            | Mecklenburg County, NC | Charlotte    | NC    | 28207    | Brick & Mortar | 4 - Upper Income         |

| Name                        | Address                       | County                  | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-----------------------------|-------------------------------|-------------------------|--------------|-------|----------|----------------|--------------------------|
| Stonecrest BC               | 7926-A Rea Road               | Mecklenburg County, NC  | Charlotte    | NC    | 28277    | Brick & Mortar | 4 - Upper Income         |
| Kings Drive BC              | 717 S. Kings Drive            | Mecklenburg County, NC  | Charlotte    | NC    | 28204    | Brick & Mortar | 4 - Upper Income         |
| Dilworth BC                 | 1511 East Blvd.               | Mecklenburg County, NC  | Charlotte    | NC    | 28203    | Brick & Mortar | 4 - Upper Income         |
| Myrtle Grove BC             | 5201 S. College Rd.           | New Hanover County, NC  | Wilmington   | NC    | 28405    | Brick & Mortar | 4 - Upper Income         |
| University Place BC         | 205 S. Estes Drive            | Orange County, NC       | Chapel Hill  | NC    | 27514    | Brick & Mortar | 3 - Middle Income        |
| Fordham Boulevard BC        | 1800 Fordham Blvd             | Orange County, NC       | Chapel Hill  | NC    | 27514    | Brick & Mortar | 3 - Middle Income        |
| Franklin Street BC          | 214 W. Franklin St            | Orange County, NC       | Chapel Hill  | NC    | 27516    | Brick & Mortar | 4 - Upper Income         |
| 47346 Landis BC             | 139 South Central Avenue      | Rowan County, NC        | Landis       | NC    | 28088    | Brick & Mortar | 3 - Middle Income        |
| 47338 Forest City BC        | 300 West Main Street          | Rutherford County, NC   | Forest City  | NC    | 28043    | Brick & Mortar | 3 - Middle Income        |
| 47345 Brevard BC            | 567 North Broad Street        | Transylvania County, NC | Brevard      | NC    | 28712    | Brick & Mortar | 4 - Upper Income         |
| 47330 Roosevelt BC          | 2402 West Roosevelt Boulevard | Union County, NC        | Monroe       | NC    | 28110    | Brick & Mortar | 3 - Middle Income        |
| 47331 Indian Trail BC       | 4240 Old Monroe Road          | Union County, NC        | Indian Trail | NC    | 28079    | Brick & Mortar | 4 - Upper Income         |
| 47354 Cureton BC            | 8100 Kensington Drive         | Union County, NC        | Waxhaw       | NC    | 28173    | Brick & Mortar | 4 - Upper Income         |
| Capital Boulevard BC        | 4917 Capital Blvd.            | Wake County, NC         | Raleigh      | NC    | 27616    | Brick & Mortar | 1 - Low Income           |
| 47353 Garner BC             | 1145 US Highway 70 West       | Wake County, NC         | Garner       | NC    | 27529    | Brick & Mortar | 2 - Moderate Income      |
| Wake Forest BC              | 100 Capcom Ave                | Wake County, NC         | Wake Forest  | NC    | 27587    | Brick & Mortar | 3 - Middle Income        |
| Six Forks and Strickland BC | 8820 Six Forks Road           | Wake County, NC         | Raleigh      | NC    | 27615    | Brick & Mortar | 3 - Middle Income        |
| North Ridge BC              | 6300 Falls of Neuse Road      | Wake County, NC         | Raleigh      | NC    | 27615    | Brick & Mortar | 3 - Middle Income        |
| Midtown East BC             | 621 East Six Forks Rd.        | Wake County, NC         | Raleigh      | NC    | 27609    | Brick & Mortar | 3 - Middle Income        |
| Wendell Falls BC            | 2260 Treelight Way            | Wake County, NC         | Wendell      | NC    | 27591    | Brick & Mortar | 3 - Middle Income        |

| Name                         | Address                         | County           | City        | State | Zip Code | Service Type   | Census Tract Income 2024 |
|------------------------------|---------------------------------|------------------|-------------|-------|----------|----------------|--------------------------|
| Rand Village BC              | 7720 Fayetteville Road          | Wake County, NC  | Raleigh     | NC    | 27603    | Brick & Mortar | 3 - Middle Income        |
| Harrison Pointe BC           | 1130 North Harrison Avenue      | Wake County, NC  | Cary        | NC    | 27513    | Brick & Mortar | 3 - Middle Income        |
| Apex Sweetwater BC           | 1121 Moncure Place              | Wake County, NC  | Apex        | NC    | 27253    | Brick & Mortar | 4 - Upper Income         |
| 47350 Creedmoor Rd BC        | 7541 Creedmoor Road             | Wake County, NC  | Raleigh     | NC    | 27613    | Brick & Mortar | 4 - Upper Income         |
| Pleasant Valley Promenade BC | 6200 Glenwood Ave.              | Wake County, NC  | Raleigh     | NC    | 27612    | Brick & Mortar | 4 - Upper Income         |
| Ridgewood BC                 | 1200 Ridge Rd.                  | Wake County, NC  | Raleigh     | NC    | 27607    | Brick & Mortar | 4 - Upper Income         |
| Crabtree Valley BC           | 4801 Glenwood Avenue            | Wake County, NC  | Raleigh     | NC    | 27612    | Brick & Mortar | 4 - Upper Income         |
| Village District BC          | 615 Oberlin Rd.                 | Wake County, NC  | Raleigh     | NC    | 27605    | Brick & Mortar | 4 - Upper Income         |
| 47415 Falls Pointe BC        | 9650 Falls of Neuse Rd.         | Wake County, NC  | Raleigh     | NC    | 27615    | Brick & Mortar | 4 - Upper Income         |
| Hayes Barton BC              | 1641 Glenwood Ave               | Wake County, NC  | Raleigh     | NC    | 27608    | Brick & Mortar | 4 - Upper Income         |
| Lake Pine BC                 | 908 US 64 Hwy W                 | Wake County, NC  | Apex        | NC    | 27502    | Brick & Mortar | 4 - Upper Income         |
| Kildaire BC                  | 1397 Kildaire Farm Rd.          | Wake County, NC  | Cary        | NC    | 27511    | Brick & Mortar | 4 - Upper Income         |
| 47352 Cary NC BC             | 7210 Tryon Road                 | Wake County, NC  | Cary        | NC    | 27518    | Brick & Mortar | 4 - Upper Income         |
| Searstone BC                 | 1725 High House Rd.             | Wake County, NC  | Cary        | NC    | 27513    | Brick & Mortar | 4 - Upper Income         |
| McCrimmon Corners BC         | 4007 Davis Drive                | Wake County, NC  | Morrisville | NC    | 27560    | Brick & Mortar | 4 - Upper Income         |
| Cary Park BC                 | 7704 Carpenter Fire Station Rd. | Wake County, NC  | Cary        | NC    | 27519    | Brick & Mortar | 4 - Upper Income         |
| Park West BC                 | 961 Morrisville Parkway         | Wake County, NC  | Morrisville | NC    | 27560    | Brick & Mortar | 4 - Upper Income         |
| 00173 West Union BC          | 500 East Main Street            | Adams County, OH | West Union  | OH    | 45693    | Brick & Mortar | 2 - Moderate Income      |
| 00281 Lima Downtown BC       | 225 North West Street           | Allen County, OH | Lima        | OH    | 45801    | Brick & Mortar | 2 - Moderate Income      |
| 00187 Lima Cable BC          | 983 North Cable Road            | Allen County, OH | Lima        | OH    | 45805    | Brick & Mortar | 3 - Middle Income        |

| Name                              | Address                            | County              | City             | State | Zip Code | Service Type       | Census Tract Income 2024 |
|-----------------------------------|------------------------------------|---------------------|------------------|-------|----------|--------------------|--------------------------|
| 00284 Wapakoneta-Bellefontaine BC | 1311 Bellefontaine Street          | Auglaize County, OH | Wapakoneta       | OH    | 45895    | Brick & Mortar     | 3 - Middle Income        |
| 00174 Georgetown OH BC            | 4899 State Route 125               | Brown County, OH    | Georgetown       | OH    | 45121    | Brick & Mortar     | 2 - Moderate Income      |
| 08336 Elliot Drive BC             | 915 Elliott Drive                  | Butler County, OH   | Middletown       | OH    | 45044    | Brick & Mortar     | 1 - Low Income           |
| 02700 Union Center BC             | 8975 Lakota Drive West             | Butler County, OH   | West Chester     | OH    | 45069    | Brick & Mortar     | 2 - Moderate Income      |
| 06313 Indian Springs BC           | 3131 Princeton Road                | Butler County, OH   | Hamilton         | OH    | 45011    | Brick & Mortar     | 2 - Moderate Income      |
| 01380 Jungle Jim BM               | 5440 Dixie Highway                 | Butler County, OH   | Fairfield        | OH    | 45014    | In-Store Bank Mart | 2 - Moderate Income      |
| 01377 Cox Rd BC                   | 7700 Cox Lane                      | Butler County, OH   | West Chester     | OH    | 45069    | Brick & Mortar     | 3 - Middle Income        |
| 05065 North West Hamilton BC      | 902 Northwest Washington Boulevard | Butler County, OH   | Hamilton         | OH    | 45013    | Brick & Mortar     | 3 - Middle Income        |
| 08350 Oxford BC                   | 455 McGuffey Avenue                | Butler County, OH   | Oxford           | OH    | 45056    | Brick & Mortar     | 3 - Middle Income        |
| 08413 Trenton BC                  | 805 West State Street              | Butler County, OH   | Trenton          | OH    | 45067    | Brick & Mortar     | 3 - Middle Income        |
| 05247 Fairfield BC                | 580 Wessel Drive                   | Butler County, OH   | Fairfield        | OH    | 45014    | Brick & Mortar     | 3 - Middle Income        |
| 08300 Fairfield Exec Ctr BC       | 6120 South Gilmore                 | Butler County, OH   | Fairfield        | OH    | 45014    | Brick & Mortar     | 3 - Middle Income        |
| 08408 Ross BC                     | 4005 Hamilton Cleves Road          | Butler County, OH   | Hamilton         | OH    | 45014    | Brick & Mortar     | 3 - Middle Income        |
| 01258 Monroe BM                   | 3033 Heritage Green Drive          | Butler County, OH   | Monroe           | OH    | 45050    | In-Store Bank Mart | 3 - Middle Income        |
| 01292 Beckett Ridge BC            | 8584 Princeton Glendale Road       | Butler County, OH   | West Chester     | OH    | 45069    | Brick & Mortar     | 4 - Upper Income         |
| 05209 Liberty Township BM         | 7300 Yankee Road                   | Butler County, OH   | Middletown       | OH    | 45044    | In-Store Bank Mart | 4 - Upper Income         |
| 08306 Tylersville Rd BM           | 7853 Tylersville Road              | Butler County, OH   | West Chester     | OH    | 45069    | In-Store Bank Mart | 4 - Upper Income         |
| 08324 Beckett Ridge BM            | 8000 Princeton Glendale Road       | Butler County, OH   | West Chester     | OH    | 45069    | In-Store Bank Mart | 4 - Upper Income         |
| Liberty BM                        | 5250 Newtown Dr.                   | Butler County, OH   | Liberty Township | OH    | 45011    | In-Store Bank Mart | 4 - Upper Income         |

| Name                               | Address                      | County              | City             | State | Zip Code | Service Type       | Census Tract Income 2024 |
|------------------------------------|------------------------------|---------------------|------------------|-------|----------|--------------------|--------------------------|
| 00288 Red Coach BC                 | 2700 North Limestone Street  | Clark County, OH    | Springfield      | OH    | 45503    | Brick & Mortar     | 3 - Middle Income        |
| 06361 Eastside Square BC           | 20 South Tuttle Road         | Clark County, OH    | Springfield      | OH    | 45505    | Brick & Mortar     | 3 - Middle Income        |
| 05146 Amelia BC                    | 1196 Ohio Pike               | Clermont County, OH | Amelia           | OH    | 45102    | Brick & Mortar     | 3 - Middle Income        |
| 08125 Eastgate BC                  | 801 Eastgate North Drive     | Clermont County, OH | Cincinnati       | OH    | 45245    | Brick & Mortar     | 3 - Middle Income        |
| 08453 Batavia OH BC                | 380 E. Main Street           | Clermont County, OH | Batavia          | OH    | 45103    | Brick & Mortar     | 3 - Middle Income        |
| 08452 South Milford BM             | 824 Main Street              | Clermont County, OH | Milford          | OH    | 45150    | In-Store Bank Mart | 3 - Middle Income        |
| 01126 Miami Township/Cincinnati BC | 6403 Branch Hill Guinea Pike | Clermont County, OH | Loveland         | OH    | 45140    | Brick & Mortar     | 4 - Upper Income         |
| Milford OH BC                      | 1095 SR 28                   | Clermont County, OH | Milford          | OH    | 45150    | Brick & Mortar     | 4 - Upper Income         |
| 00238 Wilmington BC                | 995 Rombach Avenue           | Clinton County, OH  | Wilmington       | OH    | 45177    | Brick & Mortar     | 3 - Middle Income        |
| 52301 Lakewood East BC             | 1616 West 117th Street       | Cuyahoga County, OH | Lakewood         | OH    | 44107    | Brick & Mortar     | 1 - Low Income           |
| 52320 Broadway Shoppes BC          | 6571 Broadway Avenue         | Cuyahoga County, OH | Cleveland        | OH    | 44105    | Brick & Mortar     | 1 - Low Income           |
| 00777 Euclid BC                    | 22480 Lakeshore Boulevard    | Cuyahoga County, OH | Euclid           | OH    | 44123    | Brick & Mortar     | 2 - Moderate Income      |
| 00790 Mayfield Heights BC          | 1209 SOM Center Road         | Cuyahoga County, OH | Mayfield Heights | OH    | 44124    | Brick & Mortar     | 2 - Moderate Income      |
| 01232 Maple Heights BC             | 16453 Libby Road             | Cuyahoga County, OH | Maple Heights    | OH    | 44137    | Brick & Mortar     | 2 - Moderate Income      |
| 52304 North Collinwood BC          | 972 East 185th Street        | Cuyahoga County, OH | Cleveland        | OH    | 44119    | Brick & Mortar     | 2 - Moderate Income      |
| 52315 Union Miles BC               | 4127 East 131st Street       | Cuyahoga County, OH | Cleveland        | OH    | 44105    | Brick & Mortar     | 2 - Moderate Income      |
| 00784 North Olmsted BC             | 26187 Lorain                 | Cuyahoga County, OH | North Olmsted    | OH    | 44070    | Brick & Mortar     | 2 - Moderate Income      |
| 00789 Ridge Rd BC                  | 6953 Ridge Road              | Cuyahoga County, OH | Parma            | OH    | 44129    | Brick & Mortar     | 2 - Moderate Income      |
| 52317 Reservoir Place BC           | 11005 Kinsman Road           | Cuyahoga County, OH | Cleveland        | OH    | 44104    | Brick & Mortar     | 2 - Moderate Income      |
| 03610 Lee-Harvard BM               | 16820 Harvard Avenue         | Cuyahoga County, OH | Cleveland        | OH    | 44128    | In-Store Bank Mart | 2 - Moderate Income      |



| Name                                  | Address                   | County              | City              | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------------------|---------------------------|---------------------|-------------------|-------|----------|----------------|--------------------------|
| 00764 South Euclid BC                 | 4065 Mayfield Road        | Cuyahoga County, OH | South Euclid      | OH    | 44121    | Brick & Mortar | 3 - Middle Income        |
| 00660 Brooklyn BC                     | 4653 Tiedeman Road        | Cuyahoga County, OH | Brooklyn          | OH    | 44144    | Brick & Mortar | 3 - Middle Income        |
| 00675 Fairview Park BC                | 21690 Lorain Road         | Cuyahoga County, OH | Fairview Park     | OH    | 44126    | Brick & Mortar | 3 - Middle Income        |
| 00007 Parma Heights BC                | 6809 West 130th Street    | Cuyahoga County, OH | Parma Heights     | OH    | 44130    | Brick & Mortar | 3 - Middle Income        |
| 00773 Berea BC                        | 30 West Bridge Street     | Cuyahoga County, OH | Berea             | OH    | 44017    | Brick & Mortar | 3 - Middle Income        |
| 00786 North Royalton BC               | 6465 Royalton Road        | Cuyahoga County, OH | North Royalton    | OH    | 44133    | Brick & Mortar | 3 - Middle Income        |
| 00788 Pleasant Valley BC              | 7414 Broadview Road       | Cuyahoga County, OH | Parma             | OH    | 44134    | Brick & Mortar | 3 - Middle Income        |
| 00651 Fifth Third Center Cleveland BC | 600 Superior Avenue East  | Cuyahoga County, OH | Cleveland         | OH    | 44114    | Brick & Mortar | 4 - Upper Income         |
| 00658 Woodmere BC                     | 28300 Chagrin Boulevard   | Cuyahoga County, OH | Woodmere          | OH    | 44122    | Brick & Mortar | 4 - Upper Income         |
| Greens of Lyndhurst BC                | 5680 Mayfield Rd          | Cuyahoga County, OH | Lyndhurst         | OH    | 44124    | Brick & Mortar | 4 - Upper Income         |
| 00670 Crocker Park BC                 | 30532 Detroit Road        | Cuyahoga County, OH | Westlake          | OH    | 44145    | Brick & Mortar | 4 - Upper Income         |
| 00771 Detroit- Columbia BC            | 25151 Detroit Road        | Cuyahoga County, OH | Westlake          | OH    | 44145    | Brick & Mortar | 4 - Upper Income         |
| 00505 Broadview Heights BC            | 9230 Broadview Road       | Cuyahoga County, OH | Broadview Heights | OH    | 44147    | Brick & Mortar | 4 - Upper Income         |
| 00791 Solon BC                        | 6445 SOM Center Road      | Cuyahoga County, OH | Solon             | OH    | 44139    | Brick & Mortar | 4 - Upper Income         |
| 00977 Strongsville BC                 | 16046 Pearl Road          | Cuyahoga County, OH | Strongsville      | OH    | 44136    | Brick & Mortar | 4 - Upper Income         |
| 00979 Brecksville BC                  | 8801 Brecksville Road     | Cuyahoga County, OH | Brecksville       | OH    | 44141    | Brick & Mortar | 4 - Upper Income         |
| 00286 Greenville East Main St BC      | 225 East Main Street      | Darke County, OH    | Greenville        | OH    | 45331    | Brick & Mortar | 1 - Low Income           |
| 06650 Defiance BC                     | 702 North Clinton Street  | Defiance County, OH | Defiance          | OH    | 43512    | Brick & Mortar | 3 - Middle Income        |
| 00093 Delaware BC                     | 229 South Sandusky Street | Delaware County, OH | Delaware          | OH    | 43015    | Brick & Mortar | 2 - Moderate Income      |
| 00209 Westerville North BC            | 7425 State Route 3        | Delaware County, OH | Westerville       | OH    | 43082    | Brick & Mortar | 4 - Upper Income         |

| Name                          | Address                         | County               | City                   | State | Zip Code | Service Type       | Census Tract Income 2024 |
|-------------------------------|---------------------------------|----------------------|------------------------|-------|----------|--------------------|--------------------------|
| 01747 Polaris BC              | 8353 Sancus Boulevard           | Delaware County, OH  | Columbus               | OH    | 43240    | Brick & Mortar     | 4 - Upper Income         |
| 03219 Powell Rd BC            | 3949 West Powell Road           | Delaware County, OH  | Powell                 | OH    | 43065    | Brick & Mortar     | 4 - Upper Income         |
| 06390 Lewis Ctr BC            | 8877 Owenfield Drive            | Delaware County, OH  | Powell                 | OH    | 43065    | Brick & Mortar     | 4 - Upper Income         |
| 00955 Sandusky BC             | 2211 Hayes Avenue               | Erie County, OH      | Sandusky               | OH    | 44870    | Brick & Mortar     | 2 - Moderate Income      |
| 00123 Taylor Square BC        | 2883 Taylor Road Southwest      | Fairfield County, OH | Reynoldsburg           | OH    | 43068    | Brick & Mortar     | 1 - Low Income           |
| 02926 River Valley BC         | 2152 Schorway Drive             | Fairfield County, OH | Lancaster              | OH    | 43130    | Brick & Mortar     | 3 - Middle Income        |
| 00118 Pickerington BC         | 1010 Old Diley Road             | Fairfield County, OH | Pickerington           | OH    | 43147    | Brick & Mortar     | 3 - Middle Income        |
| 00135 Fayette Ctr BC          | 1 Fayette Center                | Fayette County, OH   | Washington Court House | OH    | 43160    | Brick & Mortar     | 3 - Middle Income        |
| 00168 OSU Financial Center BC | 1960 North High Street          | Franklin County, OH  | Columbus               | OH    | 43201    | Brick & Mortar     | 1 - Low Income           |
| 00721 Linden BC               | 3407 Cleveland Avenue           | Franklin County, OH  | Columbus               | OH    | 43224    | Brick & Mortar     | 1 - Low Income           |
| 00080 Eastland OH BC          | 2810 South Hamilton Road        | Franklin County, OH  | Columbus               | OH    | 43232    | Brick & Mortar     | 1 - Low Income           |
| 00107 Lincoln Village BC      | 5055 West Broad Street          | Franklin County, OH  | Columbus               | OH    | 43228    | Brick & Mortar     | 1 - Low Income           |
| 00117 Northland BC            | 1500 Morse Road                 | Franklin County, OH  | Columbus               | OH    | 43229    | Brick & Mortar     | 2 - Moderate Income      |
| 05898 Hilliard South BC       | 2455 Hilliard Rome Road         | Franklin County, OH  | Hilliard               | OH    | 43026    | Brick & Mortar     | 2 - Moderate Income      |
| 00719 Columbus Square BC      | 2500 East Dublin Granville Road | Franklin County, OH  | Columbus               | OH    | 43231    | Brick & Mortar     | 2 - Moderate Income      |
| 00162 Reynoldsburg BC         | 6935 East Main Street           | Franklin County, OH  | Reynoldsburg           | OH    | 43068    | Brick & Mortar     | 2 - Moderate Income      |
| 00688 Whitehall BM            | 850 South Hamilton Road         | Franklin County, OH  | Whitehall              | OH    | 43213    | In-Store Bank Mart | 2 - Moderate Income      |
| 00100 Hilliard/Cemetery Rd BC | 5079 Cemetery Road              | Franklin County, OH  | Hilliard               | OH    | 43026    | Brick & Mortar     | 3 - Middle Income        |
| 00131 Bethel Rd BC            | 1340 Bethel Road                | Franklin County, OH  | Columbus               | OH    | 43220    | Brick & Mortar     | 3 - Middle Income        |

| Name                            | Address                  | County              | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------------|--------------------------|---------------------|------------------|-------|----------|----------------|--------------------------|
| 00142 Grandview BC              | 1349 West 5th Avenue     | Franklin County, OH | Columbus         | OH    | 43212    | Brick & Mortar | 3 - Middle Income        |
| 00132 Westerville South BC      | 132 West Schrock Road    | Franklin County, OH | Westerville      | OH    | 43081    | Brick & Mortar | 3 - Middle Income        |
| 00138 Dublin BC                 | 3800 West Granville Rd   | Franklin County, OH | Dublin           | OH    | 43017    | Brick & Mortar | 3 - Middle Income        |
| 00055 Blacklick BC              | 7980 East Broad Street   | Franklin County, OH | Reynoldsburg     | OH    | 43068    | Brick & Mortar | 3 - Middle Income        |
| 00151 Grove City Hoover Road BC | 4128 Hoover Road         | Franklin County, OH | Grove City       | OH    | 43123    | Brick & Mortar | 3 - Middle Income        |
| 02838 Georgesville Road BC      | 1669 Holt Road           | Franklin County, OH | Columbus         | OH    | 43228    | Brick & Mortar | 3 - Middle Income        |
| 00098 West Henderson BC         | 2081 Henderson Road      | Franklin County, OH | Columbus         | OH    | 43220    | Brick & Mortar | 4 - Upper Income         |
| 00105 Lane Ave BC               | 2465 Northwest Boulevard | Franklin County, OH | Columbus         | OH    | 43221    | Brick & Mortar | 4 - Upper Income         |
| 00130 Gahanna BC                | 444 Havens Corners Road  | Franklin County, OH | Gahanna          | OH    | 43230    | Brick & Mortar | 4 - Upper Income         |
| 00145 Upper Arlington BC        | 1669 Fishinger Road      | Franklin County, OH | Columbus         | OH    | 43221    | Brick & Mortar | 4 - Upper Income         |
| 00152 Clintonville BC           | 4080 North High Street   | Franklin County, OH | Columbus         | OH    | 43214    | Brick & Mortar | 4 - Upper Income         |
| 00157 New Albany BC             | 155 West Main Street     | Franklin County, OH | New Albany       | OH    | 43054    | Brick & Mortar | 4 - Upper Income         |
| Hamilton Quarter BC             | 5960 N Hamilton Rd       | Franklin County, OH | Westerville      | OH    | 43081    | Brick & Mortar | 4 - Upper Income         |
| 00068 Dublin-Avery Rd BC        | 6260 Perimeter Dr.       | Franklin County, OH | Dublin           | OH    | 43017    | Brick & Mortar | 4 - Upper Income         |
| 00141 Worthington BC            | 6895 North High Street   | Franklin County, OH | Worthington      | OH    | 43085    | Brick & Mortar | 4 - Upper Income         |
| 00148 Frantz Rd BC              | 420 Metro Place South    | Franklin County, OH | Dublin           | OH    | 43017    | Brick & Mortar | 4 - Upper Income         |
| 00045 Canal Winchester BC       | 680 West Waterloo Street | Franklin County, OH | Canal Winchester | OH    | 43110    | Brick & Mortar | 4 - Upper Income         |
| 00143 German Village BC         | 809 South High Street    | Franklin County, OH | Columbus         | OH    | 43206    | Brick & Mortar | 4 - Upper Income         |
| 00683 State St BC               | 21 East State Street     | Franklin County, OH | Columbus         | OH    | 43215    | Brick & Mortar | 4 - Upper Income         |

| Name                         | Address                              | County              | City          | State | Zip Code | Service Type       | Census Tract Income 2024 |
|------------------------------|--------------------------------------|---------------------|---------------|-------|----------|--------------------|--------------------------|
| 00725 Bexley/Main St BC      | 2570 East Main Street                | Franklin County, OH | Bexley        | OH    | 43209    | Brick & Mortar     | 4 - Upper Income         |
| 06111 Chardon BC             | 349 Center Street                    | Geauga County, OH   | Chardon       | OH    | 44024    | Brick & Mortar     | 4 - Upper Income         |
| 00775 Bainbridge BC          | 8355 East Washington Street          | Geauga County, OH   | Chagrin Falls | OH    | 44023    | Brick & Mortar     | 4 - Upper Income         |
| Xenia BC                     | 2042 West Main Street                | Greene County, OH   | Xenia         | OH    | 45385    | Brick & Mortar     | 2 - Moderate Income      |
| Beavercreek BC               | 2280 North Fairfield Road            | Greene County, OH   | Beavercreek   | OH    | 45431    | Brick & Mortar     | 4 - Upper Income         |
| 70302 South Fairborn BC      | 1095 East Dayton Yellow Springs Road | Greene County, OH   | Fairborn      | OH    | 45324    | Brick & Mortar     | 4 - Upper Income         |
| 05215 Carthage BC            | 7001 Vine Street                     | Hamilton County, OH | Cincinnati    | OH    | 45216    | Brick & Mortar     | 1 - Low Income           |
| 05117 University OH BC       | 2899 Vine Street                     | Hamilton County, OH | Cincinnati    | OH    | 45219    | Brick & Mortar     | 1 - Low Income           |
| 03102 Cleves BM              | 4001 State Route 128                 | Hamilton County, OH | Cleves        | OH    | 45002    | In-Store Bank Mart | 1 - Low Income           |
| 13312 Avondale BC            | 3539 Reading Rd                      | Hamilton County, OH | Cincinnati    | OH    | 45229    | Brick & Mortar     | 2 - Moderate Income      |
| 05112 Madisonville OH BC     | 5717 Madison Road                    | Hamilton County, OH | Cincinnati    | OH    | 45227    | Brick & Mortar     | 2 - Moderate Income      |
| 05110 Reading BC             | 223 West Benson Street               | Hamilton County, OH | Cincinnati    | OH    | 45215    | Brick & Mortar     | 2 - Moderate Income      |
| 05126 Seymour BC             | 1850 Seymour Avenue                  | Hamilton County, OH | Cincinnati    | OH    | 45237    | Brick & Mortar     | 2 - Moderate Income      |
| 05237 Tri-County BC          | 120 West Kemper Road                 | Hamilton County, OH | Cincinnati    | OH    | 45246    | Brick & Mortar     | 2 - Moderate Income      |
| 05238 North College Hill BC  | 6800 Hamilton Avenue                 | Hamilton County, OH | Cincinnati    | OH    | 45224    | Brick & Mortar     | 2 - Moderate Income      |
| 08434 Wyoming OH BC          | 1603 Springfield Pike                | Hamilton County, OH | Wyoming       | OH    | 45215    | Brick & Mortar     | 2 - Moderate Income      |
| 05203 Western Hills Plaza BC | 6101 Glenway Avenue                  | Hamilton County, OH | Cincinnati    | OH    | 45211    | Brick & Mortar     | 2 - Moderate Income      |
| 05208 Hopple Street BC       | 3000 Henshaw Avenue                  | Hamilton County, OH | Cincinnati    | OH    | 45225    | Brick & Mortar     | 2 - Moderate Income      |
| 05252 Monfort Heights BC     | 5540 Cheviot Road                    | Hamilton County, OH | Cincinnati    | OH    | 45247    | Brick & Mortar     | 2 - Moderate Income      |

| Name                                   | Address                  | County              | City       | State | Zip Code | Service Type       | Census Tract Income 2024 |
|----------------------------------------|--------------------------|---------------------|------------|-------|----------|--------------------|--------------------------|
| 08352 Cheviot BC                       | 3616 Harrison Avenue     | Hamilton County, OH | Cincinnati | OH    | 45211    | Brick & Mortar     | 2 - Moderate Income      |
| 05140 Sharonville BC                   | 11792 Lebanon Road       | Hamilton County, OH | Cincinnati | OH    | 45241    | Brick & Mortar     | 3 - Middle Income        |
| 08326 Fairfax BC                       | 5771 Wooster Pike        | Hamilton County, OH | Cincinnati | OH    | 45227    | Brick & Mortar     | 3 - Middle Income        |
| 05121 Pleasant Ridge BC                | 6057 Montgomery Road     | Hamilton County, OH | Cincinnati | OH    | 45213    | Brick & Mortar     | 3 - Middle Income        |
| 05127 Norwood BC                       | 2150 Sherman Avenue      | Hamilton County, OH | Norwood    | OH    | 45212    | Brick & Mortar     | 3 - Middle Income        |
| 05131 Kenwood BC                       | 7708 Montgomery Road     | Hamilton County, OH | Cincinnati | OH    | 45236    | Brick & Mortar     | 3 - Middle Income        |
| 08442 Downtown Blue Ash BC             | 9477 Kenwood Road        | Hamilton County, OH | Cincinnati | OH    | 45242    | Brick & Mortar     | 3 - Middle Income        |
| 10301 MOB BC                           | 5001 Kingsley Drive      | Hamilton County, OH | Cincinnati | OH    | 45227    | Brick & Mortar     | 3 - Middle Income        |
| 10302 MOC BC                           | 5050 Kingsley Drive      | Hamilton County, OH | Cincinnati | OH    | 45227    | Brick & Mortar     | 3 - Middle Income        |
| 05130 St Bernard BC                    | 4812 Vine Street         | Hamilton County, OH | Cincinnati | OH    | 45217    | Brick & Mortar     | 3 - Middle Income        |
| 08390 Compton Rd BC                    | 9020 Winton Road         | Hamilton County, OH | Cincinnati | OH    | 45231    | Brick & Mortar     | 3 - Middle Income        |
| 05006 Court and Main BC                | 900 Main Street          | Hamilton County, OH | Cincinnati | OH    | 45202    | Brick & Mortar     | 3 - Middle Income        |
| 05066 Delhi BC                         | 5262 Delhi Pike          | Hamilton County, OH | Cincinnati | OH    | 45238    | Brick & Mortar     | 3 - Middle Income        |
| 05090 Fifth Third Center Cincinnati BC | 38 Fountain Square Plaza | Hamilton County, OH | Cincinnati | OH    | 45202    | Brick & Mortar     | 3 - Middle Income        |
| 05218 Overlook BC                      | 4901 Glenway Avenue      | Hamilton County, OH | Cincinnati | OH    | 45238    | Brick & Mortar     | 3 - Middle Income        |
| 05120 Oakley Station BM                | 4613 Marburg Avenue      | Hamilton County, OH | Cincinnati | OH    | 45209    | In-Store Bank Mart | 3 - Middle Income        |
| 05236 North Gate BM                    | 3636 Springdale Road     | Hamilton County, OH | Cincinnati | OH    | 45251    | In-Store Bank Mart | 3 - Middle Income        |
| 08305 Forest Park BM                   | 1212 West Kemper Road    | Hamilton County, OH | Cincinnati | OH    | 45240    | In-Store Bank Mart | 3 - Middle Income        |
| 03101 Dent BM                          | 5910 Harrison Avenue     | Hamilton County, OH | Cincinnati | OH    | 45248    | In-Store Bank Mart | 3 - Middle Income        |
| 08317 Harrison BM                      | 10477 Harrison Avenue    | Hamilton County, OH | Harrison   | OH    | 45030    | In-Store Bank Mart | 3 - Middle Income        |

| Name                           | Address                     | County              | City       | State | Zip Code | Service Type       | Census Tract Income 2024 |
|--------------------------------|-----------------------------|---------------------|------------|-------|----------|--------------------|--------------------------|
| 05119 Mt Washington BC         | 2094 Beechmont Avenue       | Hamilton County, OH | Cincinnati | OH    | 45230    | Brick & Mortar     | 4 - Upper Income         |
| 05135 Walnut Hills BC          | 2355 Victory Parkway        | Hamilton County, OH | Cincinnati | OH    | 45206    | Brick & Mortar     | 4 - Upper Income         |
| 05162 Anderson Township BC     | 7700 Five Mile Road         | Hamilton County, OH | Cincinnati | OH    | 45230    | Brick & Mortar     | 4 - Upper Income         |
| 05113 Camargo Madeira BC       | 7101 Miami Avenue           | Hamilton County, OH | Madeira    | OH    | 45243    | Brick & Mortar     | 4 - Upper Income         |
| 05128 Hyde Park OH BC          | 2632 Erie Avenue            | Hamilton County, OH | Cincinnati | OH    | 45208    | Brick & Mortar     | 4 - Upper Income         |
| 05142 Montgomery BC            | 9990 Montgomery Road        | Hamilton County, OH | Cincinnati | OH    | 45242    | Brick & Mortar     | 4 - Upper Income         |
| 06476 Loveland BC              | 10708 Loveland Madeira Road | Hamilton County, OH | Loveland   | OH    | 45140    | Brick & Mortar     | 4 - Upper Income         |
| 05229 Evendale-Woodlawn BC     | 2998 Cunningham Drive       | Hamilton County, OH | Evendale   | OH    | 45241    | Brick & Mortar     | 4 - Upper Income         |
| 05239 Mack Bridgetown BC       | 3715 Ebenezer Road          | Hamilton County, OH | Cincinnati | OH    | 45248    | Brick & Mortar     | 4 - Upper Income         |
| 10303 Harpers Point BM         | 11390 Montgomery Road       | Hamilton County, OH | Cincinnati | OH    | 45249    | In-Store Bank Mart | 4 - Upper Income         |
| 08301 Anderson Towne Center BM | 7580 Beechmont Avenue       | Hamilton County, OH | Cincinnati | OH    | 45255    | In-Store Bank Mart | 4 - Upper Income         |
| 08307 Hunt Rd BM               | 4100 Hunt Road              | Hamilton County, OH | Cincinnati | OH    | 45236    | In-Store Bank Mart | 4 - Upper Income         |
| 00960 Findlay Downtown BC      | 337 South Main Street       | Hancock County, OH  | Findlay    | OH    | 45840    | Brick & Mortar     | 3 - Middle Income        |
| 00962 Eastview BC              | 1735 East Tiffin Avenue     | Hancock County, OH  | Findlay    | OH    | 45840    | Brick & Mortar     | 4 - Upper Income         |
| 00242 Hillsboro N High BC      | 511 North High Street       | Highland County, OH | Hillsboro  | OH    | 45133    | Brick & Mortar     | 3 - Middle Income        |
| 00654 Eastlake BC              | 33464 Vine Street           | Lake County, OH     | Eastlake   | OH    | 44095    | Brick & Mortar     | 2 - Moderate Income      |
| 00655 Mentor BC                | 6675 Center Street          | Lake County, OH     | Mentor     | OH    | 44060    | Brick & Mortar     | 3 - Middle Income        |
| 01127 Willoughby South BC      | 5831 SOM Center Road        | Lake County, OH     | Willoughby | OH    | 44094    | Brick & Mortar     | 3 - Middle Income        |
| 00656 Concord BC               | 9881 Johnnycake Ridge Road  | Lake County, OH     | Mentor     | OH    | 44060    | Brick & Mortar     | 4 - Upper Income         |

| Name                              | Address                 | County             | City             | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-----------------------------------|-------------------------|--------------------|------------------|-------|----------|----------------|--------------------------|
| 00208 Newark BC                   | 1235 North 21st Street  | Licking County, OH | Newark           | OH    | 43055    | Brick & Mortar | 2 - Moderate Income      |
| 00189 Bellefontaine South Main BC | 541 South Main Street   | Logan County, OH   | Bellefontaine    | OH    | 43311    | Brick & Mortar | 3 - Middle Income        |
| 00766 Lorain- Downtown BC         | 559 Broadway Avenue     | Lorain County, OH  | Lorain           | OH    | 44052    | Brick & Mortar | 1 - Low Income           |
| 03611 Elyria BC                   | 281 Broad Street        | Lorain County, OH  | Elyria           | OH    | 44035    | Brick & Mortar | 1 - Low Income           |
| 00024 North Ridgeville BC         | 32800 Center Ridge Road | Lorain County, OH  | North Ridgeville | OH    | 44039    | Brick & Mortar | 3 - Middle Income        |
| 00767 Amherst BC                  | 309 North Leavitt Road  | Lorain County, OH  | Amherst          | OH    | 44001    | Brick & Mortar | 3 - Middle Income        |
| 00832 Wellington BC               | 161 East Herrick Avenue | Lorain County, OH  | Wellington       | OH    | 44090    | Brick & Mortar | 3 - Middle Income        |
| 00002 Avon OH BC                  | 36192 Detroit Road      | Lorain County, OH  | Avon             | OH    | 44011    | Brick & Mortar | 4 - Upper Income         |
| 00004 Avon Lake BC                | 409 Lear Road           | Lorain County, OH  | Avon Lake        | OH    | 44012    | Brick & Mortar | 4 - Upper Income         |
| 00901 Lagrange / Central BC       | 3028 LaGrange Street    | Lucas County, OH   | Toledo           | OH    | 43608    | Brick & Mortar | 0 - Income Not Available |
| 34083 One Seagate Main Office BC  | 550 North Summit St     | Lucas County, OH   | Toledo           | OH    | 43604    | Brick & Mortar | 0 - Income Not Available |
| 00906 Point Place BC              | 4706 Summit Street      | Lucas County, OH   | Toledo           | OH    | 43611    | Brick & Mortar | 2 - Moderate Income      |
| 00911 Byrne Glendale BC           | 3428 Glendale Avenue    | Lucas County, OH   | Toledo           | OH    | 43614    | Brick & Mortar | 2 - Moderate Income      |
| 00912 Dorr Reynolds BC            | 1308 North Reynolds Rd  | Lucas County, OH   | Toledo           | OH    | 43615    | Brick & Mortar | 2 - Moderate Income      |
| Maumee Dussel BC                  | 196 Dussel Drive        | Lucas County, OH   | Maumee           | OH    | 43537    | Brick & Mortar | 2 - Moderate Income      |
| 00909 Deveaux BC                  | 4035 Douglas Road       | Lucas County, OH   | Toledo           | OH    | 43613    | Brick & Mortar | 3 - Middle Income        |
| 00914 Westgate OH BC              | 3355 Secor Road         | Lucas County, OH   | Toledo           | OH    | 43606    | Brick & Mortar | 3 - Middle Income        |
| 00922 Alexis Lewis BC             | 1028 West Alexis        | Lucas County, OH   | Toledo           | OH    | 43612    | Brick & Mortar | 3 - Middle Income        |
| 00948 Spring Meadows BC           | 6600 Airport Highway    | Lucas County, OH   | Holland          | OH    | 43528    | Brick & Mortar | 3 - Middle Income        |
| 00927 Swanton BC                  | 3 Turtle Creek Drive    | Lucas County, OH   | Swanton          | OH    | 43558    | Brick & Mortar | 3 - Middle Income        |

| Name                           | Address                       | County                | City       | State | Zip Code | Service Type   | Census Tract Income 2024 |
|--------------------------------|-------------------------------|-----------------------|------------|-------|----------|----------------|--------------------------|
| 00919 Sylvania BC              | 5833 Monroe Street            | Lucas County, OH      | Sylvania   | OH    | 43560    | Brick & Mortar | 4 - Upper Income         |
| 00949 Central King BC          | 7536 West Central Avenue      | Lucas County, OH      | Toledo     | OH    | 43617    | Brick & Mortar | 4 - Upper Income         |
| 00923 Waterville BC            | 1365 Michigan Avenue          | Lucas County, OH      | Waterville | OH    | 43566    | Brick & Mortar | 4 - Upper Income         |
| 05682 Oregon Ohio BC           | 3739 Navarre Avenue           | Lucas County, OH      | Oregon     | OH    | 43616    | Brick & Mortar | 4 - Upper Income         |
| 00206 Marion East BC           | 1607 Marion Mount Gilead Road | Marion County, OH     | Marion     | OH    | 43302    | Brick & Mortar | 3 - Middle Income        |
| 05046 Medina North Court BC    | 810 North Court Street        | Medina County, OH     | Medina     | OH    | 44256    | Brick & Mortar | 3 - Middle Income        |
| 00774 Brunswick BC             | 4023 Center Road              | Medina County, OH     | Brunswick  | OH    | 44212    | Brick & Mortar | 3 - Middle Income        |
| 00735 Wadsworth BC             | 1068 High Street              | Medina County, OH     | Wadsworth  | OH    | 44281    | Brick & Mortar | 4 - Upper Income         |
| 00261 Piqua Market BC          | 123 Market Street             | Miami County, OH      | Piqua      | OH    | 45356    | Brick & Mortar | 3 - Middle Income        |
| 00262 Piqua High BC            | 1701 West High Street         | Miami County, OH      | Piqua      | OH    | 45356    | Brick & Mortar | 3 - Middle Income        |
| 00271 Troy South BC            | 825 West Market Street        | Miami County, OH      | Troy       | OH    | 45373    | Brick & Mortar | 3 - Middle Income        |
| 00273 Tipp Dixie BC            | 1551 West Main Street         | Miami County, OH      | Tipp City  | OH    | 45371    | Brick & Mortar | 3 - Middle Income        |
| 00272 Troy Town BC             | 1851 West Main Street         | Miami County, OH      | Troy       | OH    | 45373    | Brick & Mortar | 4 - Upper Income         |
| 00530 Trotwood BC              | 1 East Main Street            | Montgomery County, OH | Trotwood   | OH    | 45426    | Brick & Mortar | 2 - Moderate Income      |
| 00222 Breitenstrater Square BC | 1032 Patterson Road           | Montgomery County, OH | Dayton     | OH    | 45420    | Brick & Mortar | 2 - Moderate Income      |
| 00245 Town and Country BC      | 4120 Far Hills Avenue         | Montgomery County, OH | Dayton     | OH    | 45429    | Brick & Mortar | 2 - Moderate Income      |
| 00531 Miami Township/Dayton BC | 5790 Springboro Pike          | Montgomery County, OH | Dayton     | OH    | 45449    | Brick & Mortar | 2 - Moderate Income      |
| 03252 Moraine BC               | 1923 Dorothy Lane             | Montgomery County, OH | Moraine    | OH    | 45439    | Brick & Mortar | 2 - Moderate Income      |
| 00051 York Commons BC          | 8028 North Dixie Drive        | Montgomery County, OH | Dayton     | OH    | 45414    | Brick & Mortar | 3 - Middle Income        |
| 00122 Salem Mall BC            | 2250 Shiloh Springs Road      | Montgomery County, OH | Trotwood   | OH    | 45426    | Brick & Mortar | 3 - Middle Income        |



| Name                                | Address                          | County                | City          | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------------|----------------------------------|-----------------------|---------------|-------|----------|----------------|--------------------------|
| 00527 Englewood Financial Center BC | 310 West National Road           | Montgomery County, OH | Englewood     | OH    | 45322    | Brick & Mortar | 3 - Middle Income        |
| 00128 Huber Heights BC              | 7601 Troy Pike                   | Montgomery County, OH | Huber Heights | OH    | 45424    | Brick & Mortar | 3 - Middle Income        |
| 00116 Oakwood BC                    | 2601 Far Hills Avenue            | Montgomery County, OH | Dayton        | OH    | 45419    | Brick & Mortar | 4 - Upper Income         |
| 00129 South Centerville BC          | 925 South Main Street            | Montgomery County, OH | Centerville   | OH    | 45458    | Brick & Mortar | 4 - Upper Income         |
| 00329 Fifth Third Center Dayton BC  | 1 South Main Street              | Montgomery County, OH | Dayton        | OH    | 45402    | Brick & Mortar | 4 - Upper Income         |
| 00485 Sugarcreek BC                 | 6301 Wilmington Pike             | Montgomery County, OH | Dayton        | OH    | 45459    | Brick & Mortar | 4 - Upper Income         |
| 00536 Whipp Rd BC                   | 39 West Whipp Road               | Montgomery County, OH | Dayton        | OH    | 45459    | Brick & Mortar | 4 - Upper Income         |
| 00223 Dayton Mall BC                | 2240 Miamisburg Centerville Road | Montgomery County, OH | Dayton        | OH    | 45459    | Brick & Mortar | 4 - Upper Income         |
| 00517 Alex Rd BC                    | 120 Alexandersville Road         | Montgomery County, OH | Miamisburg    | OH    | 45342    | Brick & Mortar | 4 - Upper Income         |
| 00692 Circleville BC                | 159 East Main Street             | Pickaway County, OH   | Circleville   | OH    | 43113    | Brick & Mortar | 2 - Moderate Income      |
| 04402 Aurora BC                     | 353 West Garfield Road           | Portage County, OH    | Aurora        | OH    | 44202    | Brick & Mortar | 4 - Upper Income         |
| 00225 Eaton BC                      | 1604 North Barron Street         | Preble County, OH     | Eaton         | OH    | 45320    | Brick & Mortar | 3 - Middle Income        |
| 00240 Chillicothe Downtown BC       | 128 West Main St                 | Ross County, OH       | Chillicothe   | OH    | 45601    | Brick & Mortar | 3 - Middle Income        |
| 00973 Fremont West BC               | 1207 Oak Harbor Road             | Sandusky County, OH   | Fremont       | OH    | 43420    | Brick & Mortar | 2 - Moderate Income      |
| Portsmouth BC                       | 1115 Gay Street                  | Scioto County, OH     | Portsmouth    | OH    | 45662    | Brick & Mortar | 1 - Low Income           |
| 00212 Lucasville BC                 | 10551 US 23                      | Scioto County, OH     | Lucasville    | OH    | 45648    | Brick & Mortar | 2 - Moderate Income      |
| 00952 Tiffin BC                     | 513 Market Street                | Seneca County, OH     | Tiffin        | OH    | 44883    | Brick & Mortar | 2 - Moderate Income      |
| 00966 Perry St Fostoria BC          | 220 South Perry Street           | Seneca County, OH     | Fostoria      | OH    | 44830    | Brick & Mortar | 3 - Middle Income        |
| 00182 Sidney West BC                | 2300 W. Michigan Street          | Shelby County, OH     | Sidney        | OH    | 45365    | Brick & Mortar | 4 - Upper Income         |

| Name                      | Address                       | County            | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|---------------------------|-------------------------------|-------------------|----------------|-------|----------|----------------|--------------------------|
| 01156 Perry Township BC   | 4653 Tuscarawas Street West   | Stark County, OH  | Canton         | OH    | 44708    | Brick & Mortar | 3 - Middle Income        |
| 02887 North Canton BC     | 1637 North Main Street        | Stark County, OH  | North Canton   | OH    | 44720    | Brick & Mortar | 4 - Upper Income         |
| 05258 Jackson Township BC | 5067 Portage Street Northwest | Stark County, OH  | North Canton   | OH    | 44720    | Brick & Mortar | 4 - Upper Income         |
| 00678 Downtown Akron BC   | 121 South Main Street         | Summit County, OH | Akron          | OH    | 44308    | Brick & Mortar | 0 - Income Not Available |
| 00642 Barberton BC        | 532 Wooster Road West         | Summit County, OH | Barberton      | OH    | 44203    | Brick & Mortar | 1 - Low Income           |
| 52311 Highland Square BC  | 656 West Market Street        | Summit County, OH | Akron          | OH    | 44303    | Brick & Mortar | 1 - Low Income           |
| 00633 Cuyahoga Falls BC   | 2335 Second Street            | Summit County, OH | Cuyahoga Falls | OH    | 44221    | Brick & Mortar | 3 - Middle Income        |
| 00635 Tallmadge BC        | 40 North Avenue               | Summit County, OH | Tallmadge      | OH    | 44278    | Brick & Mortar | 3 - Middle Income        |
| 00639 Graham Rd BC        | 911 Graham Road               | Summit County, OH | Cuyahoga Falls | OH    | 44221    | Brick & Mortar | 3 - Middle Income        |
| 00640 Ellet BC            | 576 Canton Road               | Summit County, OH | Akron          | OH    | 44312    | Brick & Mortar | 3 - Middle Income        |
| 00643 Oregon Trail BC     | 4070 Fishcreek Road           | Summit County, OH | Stow           | OH    | 44224    | Brick & Mortar | 3 - Middle Income        |
| 00647 Fairlawn BC         | 3640 West Market Street       | Summit County, OH | Fairlawn       | OH    | 44333    | Brick & Mortar | 3 - Middle Income        |
| 00636 Arlington BC        | 3150 South Arlington Road     | Summit County, OH | Akron          | OH    | 44312    | Brick & Mortar | 4 - Upper Income         |
| 00638 Hudson BC           | 122 West Streetsboro Street   | Summit County, OH | Hudson         | OH    | 44236    | Brick & Mortar | 4 - Upper Income         |
| 00669 Twinsburg BC        | 8901 Darrow                   | Summit County, OH | Twinsburg      | OH    | 44087    | Brick & Mortar | 4 - Upper Income         |
| 04480 Macedonia BC        | 943 Aurora Drive              | Summit County, OH | Macedonia      | OH    | 44056    | Brick & Mortar | 4 - Upper Income         |
| 00691 Marysville OH BC    | 120 West 5th Street           | Union County, OH  | Marysville     | OH    | 43040    | Brick & Mortar | 3 - Middle Income        |
| 00424 Lebanon BC          | 122 North Broadway            | Warren County, OH | Lebanon        | OH    | 45036    | Brick & Mortar | 3 - Middle Income        |
| 00228 Franklin OH BC      | 1325 East Second Street       | Warren County, OH | Franklin       | OH    | 45005    | Brick & Mortar | 3 - Middle Income        |
| 00438 Springboro BC       | 790 Gardner Road              | Warren County, OH | Springboro     | OH    | 45066    | Brick & Mortar | 3 - Middle Income        |

| Name                            | Address                      | County                | City             | State | Zip Code | Service Type       | Census Tract Income 2024 |
|---------------------------------|------------------------------|-----------------------|------------------|-------|----------|--------------------|--------------------------|
| 08429 Landen BM                 | 2900 West US 22              | Warren County, OH     | Maineville       | OH    | 45039    | In-Store Bank Mart | 3 - Middle Income        |
| 00421 Mason OH BC               | 225 West Main Street         | Warren County, OH     | Mason            | OH    | 45040    | Brick & Mortar     | 4 - Upper Income         |
| 00422 Landen/20 Mile Stand BC   | 9095 Lighthouse Way          | Warren County, OH     | Loveland         | OH    | 45140    | Brick & Mortar     | 4 - Upper Income         |
| Western Row BC                  | 7150 N. Mason Montgomery Rd. | Warren County, OH     | Mason            | OH    | 45040    | Brick & Mortar     | 4 - Upper Income         |
| 05084 Symmes Township BC        | 5208 Fields Ertel Road       | Warren County, OH     | Cincinnati       | OH    | 45249    | Brick & Mortar     | 4 - Upper Income         |
| 08448 Lebanon BM                | 1425 Columbus Avenue         | Warren County, OH     | Lebanon          | OH    | 45036    | In-Store Bank Mart | 4 - Upper Income         |
| 00943 Bowling Green Downtown BC | 275 South Main Street        | Wood County, OH       | Bowling Green    | OH    | 43402    | Brick & Mortar     | 2 - Moderate Income      |
| 00916 Northwood BC              | 2673 Woodville Road          | Wood County, OH       | Northwood        | OH    | 43619    | Brick & Mortar     | 4 - Upper Income         |
| 00942 Perrysburg BC             | 26521 North Dixie Highway    | Wood County, OH       | Perrysburg       | OH    | 43551    | Brick & Mortar     | 4 - Upper Income         |
| 03437 Crossroads OH BC          | 10105 Fremont Pike           | Wood County, OH       | Perrysburg       | OH    | 43551    | Brick & Mortar     | 4 - Upper Income         |
| Beaufort Station BC             | 351A Robert Smalls Parkway   | Beaufort County, SC   | Beaufort         | SC    | 29906    | Brick & Mortar     | 3 - Middle Income        |
| Summerville BC                  | 1306 N Main St               | Berkeley County, SC   | Summerville      | SC    | 29483    | Brick & Mortar     | 3 - Middle Income        |
| James Island BC                 | 1301 Folly Road              | Charleston County, SC | Charleston       | SC    | 29412    | Brick & Mortar     | 2 - Moderate Income      |
| 47390 West Ashley BC            | 844 Savannah Hwy             | Charleston County, SC | Charleston       | SC    | 29407    | Brick & Mortar     | 3 - Middle Income        |
| Coleman Boulevard BC            | 710 Coleman Blvd.            | Charleston County, SC | Mount Pleasant   | SC    | 29464    | Brick & Mortar     | 4 - Upper Income         |
| Cedar Grove BC                  | 8807 Dorchester Rd.          | Dorchester County, SC | North Charleston | SC    | 29420    | Brick & Mortar     | 4 - Upper Income         |
| West End BC                     | 656 S. Main St.              | Greenville County, SC | Greenville       | SC    | 29601    | Brick & Mortar     | 0 - Income Not Available |
| Wade Hampton BC                 | 2801-B Wade Hampton Blvd     | Greenville County, SC | Taylors          | SC    | 29687    | Brick & Mortar     | 2 - Moderate Income      |
| Pelham BC                       | 3556 Pelham Road             | Greenville County, SC | Greenville       | SC    | 29615    | Brick & Mortar     | 4 - Upper Income         |
| Augusta BC                      | 1600 Augusta Road            | Greenville County, SC | Greenville       | SC    | 29605    | Brick & Mortar     | 4 - Upper Income         |

| Name                                | Address                     | County                 | City         | State | Zip Code | Service Type   | Census Tract Income 2024 |
|-------------------------------------|-----------------------------|------------------------|--------------|-------|----------|----------------|--------------------------|
| Northpointe BC                      | 225 E Stone Street          | Greenville County, SC  | Greenville   | SC    | 29609    | Brick & Mortar | 4 - Upper Income         |
| Woodruff BC                         | 1510 Woodruff Road          | Greenville County, SC  | Greenville   | SC    | 29607    | Brick & Mortar | 4 - Upper Income         |
| Five Forks BC                       | 2608 Woodruff Road          | Greenville County, SC  | Simpsonville | SC    | 29681    | Brick & Mortar | 4 - Upper Income         |
| Carolina Promenade BC               | 7730 Charlotte Hwy          | Lancaster County, SC   | Indian Land  | SC    | 29707    | Brick & Mortar | 4 - Upper Income         |
| East Spartanburg BC                 | 1585 E.Main St.             | Spartanburg County, NC | Spartanburg  | SC    | 29307    | Brick & Mortar | 4 - Upper Income         |
| Fort Mill BC                        | 2139 Hwy 160 W              | York County, SC        | Fort Mill    | SC    | 29708    | Brick & Mortar | 4 - Upper Income         |
| 36302 Metrocenter BC                | 2054 Rosa L Parks Boulevard | Davidson County, TN    | Nashville    | TN    | 37228    | Brick & Mortar | 0 - Income Not Available |
| 03689 North Lake TN BC              | 5550 Old Hickory Boulevard  | Davidson County, TN    | Hermitage    | TN    | 37076    | Brick & Mortar | 2 - Moderate Income      |
| 05876 Willowbrook BC                | 47 East Thompson Lane       | Davidson County, TN    | Nashville    | TN    | 37211    | Brick & Mortar | 2 - Moderate Income      |
| 05880 Donelson BC                   | 525 Donelson Pike           | Davidson County, TN    | Nashville    | TN    | 37214    | Brick & Mortar | 2 - Moderate Income      |
| 01158 Charlotte Park BC             | 5625 Charlotte Pike         | Davidson County, TN    | Nashville    | TN    | 37209    | Brick & Mortar | 2 - Moderate Income      |
| 05696 Rivergate BC                  | 2347 Gallatin Pike          | Davidson County, TN    | Madison      | TN    | 37115    | Brick & Mortar | 2 - Moderate Income      |
| 36306 Madison BC                    | 306 North Gallatin Pike     | Davidson County, TN    | Madison      | TN    | 37115    | Brick & Mortar | 2 - Moderate Income      |
| 05694 Bell Road East BC             | 1311 Bell Road              | Davidson County, TN    | Antioch      | TN    | 37013    | Brick & Mortar | 2 - Moderate Income      |
| 05860 Nashboro Village BC           | 2326 Murfreesboro Pike      | Davidson County, TN    | Nashville    | TN    | 37217    | Brick & Mortar | 3 - Middle Income        |
| Hermitage BC                        | 4715 Andrew Jackson Parkway | Davidson County, TN    | Hermitage    | TN    | 37076    | Brick & Mortar | 3 - Middle Income        |
| 01171 Hickory Village BC            | 5820 Nolensville Pike       | Davidson County, TN    | Nashville    | TN    | 37211    | Brick & Mortar | 3 - Middle Income        |
| 04510 Mill Creek BC                 | 6674 Nolensville Pike       | Davidson County, TN    | Brentwood    | TN    | 37027    | Brick & Mortar | 4 - Upper Income         |
| 02850 Belle Meade BC                | 4329 Harding Pike           | Davidson County, TN    | Nashville    | TN    | 37205    | Brick & Mortar | 4 - Upper Income         |
| 03776 Nashville Financial Center BC | 424 Church Street           | Davidson County, TN    | Nashville    | TN    | 37219    | Brick & Mortar | 4 - Upper Income         |

| Name                       | Address                         | County                | City           | State | Zip Code | Service Type   | Census Tract Income 2024 |
|----------------------------|---------------------------------|-----------------------|----------------|-------|----------|----------------|--------------------------|
| 03777 Green Hills BC       | 2216 Abbott Martin Road         | Davidson County, TN   | Nashville      | TN    | 37215    | Brick & Mortar | 4 - Upper Income         |
| 05875 Music Row BC         | 2000 Wedgewood Avenue           | Davidson County, TN   | Nashville      | TN    | 37212    | Brick & Mortar | 4 - Upper Income         |
| Midtown BC                 | 1715 West End Ave.              | Davidson County, TN   | Nashville      | TN    | 37203    | Brick & Mortar | 4 - Upper Income         |
| Berry Hill BC              | 2319 8th Avenue South           | Davidson County, TN   | Nashville      | TN    | 37204    | Brick & Mortar | 4 - Upper Income         |
| South Gulch BC             | 604 12th Ave. South             | Davidson County, TN   | Nashville      | TN    | 37203    | Brick & Mortar | 4 - Upper Income         |
| 04496 Nippers Corner BC    | 495 Old Hickory                 | Davidson County, TN   | Brentwood      | TN    | 37027    | Brick & Mortar | 4 - Upper Income         |
| 04499 Harpeth Valley BC    | 8042 Highway 100                | Davidson County, TN   | Nashville      | TN    | 37221    | Brick & Mortar | 4 - Upper Income         |
| West Meade BC              | 5314 Harding Pike               | Davidson County, TN   | Nashville      | TN    | 37205    | Brick & Mortar | 4 - Upper Income         |
| 36307 Walker Springs BC    | 8331 East Walker Springs Lane   | Knox County, TN       | Knoxville      | TN    | 37923    | Brick & Mortar | 4 - Upper Income         |
| 36317 Bearden BC           | 5612 Kingston Pike              | Knox County, TN       | Knoxville      | TN    | 37919    | Brick & Mortar | 4 - Upper Income         |
| Turkey Creek BC            | 10916 Parkside Dr               | Knox County, TN       | Knoxville      | TN    | 37934    | Brick & Mortar | 4 - Upper Income         |
| Port Royal BC              | 4881 Port Royal Rd              | Maury County, TN      | Spring Hill    | TN    | 37174    | Brick & Mortar | 3 - Middle Income        |
| White House BC             | 514 Hwy 76                      | Robertson County, TN  | White House    | TN    | 37188    | Brick & Mortar | 3 - Middle Income        |
| 01293 University Center BC | 2927 South Rutherford Boulevard | Rutherford County, TN | Murfreesboro   | TN    | 37130    | Brick & Mortar | 1 - Low Income           |
| 05818 Indian Hills BC      | 2950 South Church Street        | Rutherford County, TN | Murfreesboro   | TN    | 37127    | Brick & Mortar | 3 - Middle Income        |
| 05822 Old Fort Parkway BC  | 2437 Old Fort Parkway           | Rutherford County, TN | Murfreesboro   | TN    | 37128    | Brick & Mortar | 3 - Middle Income        |
| 05877 Smyrna BC            | 475 Sam Ridley Parkway          | Rutherford County, TN | Smyrna         | TN    | 37167    | Brick & Mortar | 3 - Middle Income        |
| Murfreesboro BC            | 1861 Memorial Boulevard         | Rutherford County, TN | Murfreesboro   | TN    | 37129    | Brick & Mortar | 3 - Middle Income        |
| 05695 Gallatin BC          | 1131 Nashville Pike             | Sumner County, TN     | Gallatin       | TN    | 37066    | Brick & Mortar | 3 - Middle Income        |
| 05699 Glenbrook BC         | 1044 Glenbrook Way              | Sumner County, TN     | Hendersonville | TN    | 37075    | Brick & Mortar | 3 - Middle Income        |

| Name                              | Address                     | County                | City           | State | Zip Code | Service Type           | Census Tract Income 2024 |
|-----------------------------------|-----------------------------|-----------------------|----------------|-------|----------|------------------------|--------------------------|
| 05697 Callender Lane BC           | 380 East Main Street        | Sumner County, TN     | Hendersonville | TN    | 37075    | Brick & Mortar         | 4 - Upper Income         |
| 03780 Fairview BC                 | 2191 Fairview Boulevard     | Williamson County, TN | Fairview       | TN    | 37062    | Brick & Mortar         | 3 - Middle Income        |
| 03781 Cool Springs BC             | 1713 Mallory Lane           | Williamson County, TN | Brentwood      | TN    | 37027    | Brick & Mortar         | 3 - Middle Income        |
| Carothers Crossing West BC        | 5045 Carothers Parkway      | Williamson County, TN | Franklin       | TN    | 37067    | Brick & Mortar         | 4 - Upper Income         |
| 03774 Williamson Square BC        | 1105 Murfreesboro Road      | Williamson County, TN | Franklin       | TN    | 37064    | Brick & Mortar         | 4 - Upper Income         |
| 03775 Fieldstone Farms BC         | 2040 Fieldstone Parkway     | Williamson County, TN | Franklin       | TN    | 37069    | Brick & Mortar         | 4 - Upper Income         |
| 03778 Brentwood BC                | 5000 Maryland Way           | Williamson County, TN | Brentwood      | TN    | 37027    | Brick & Mortar         | 4 - Upper Income         |
| 03782 Spring Hill BC              | 3008 Belshire Village Drive | Williamson County, TN | Spring Hill    | TN    | 37174    | Brick & Mortar         | 4 - Upper Income         |
| 02801 Huntington East BC          | 101 River Road              | Cabell County, WV     | Barboursville  | WV    | 25504    | Brick & Mortar         | 3 - Middle Income        |
| 55302 Hal Greer BC                | 1566 Hal Greer Boulevard    | Cabell County, WV     | Huntington     | WV    | 25701    | Brick & Mortar         | 4 - Upper Income         |
| 01852 Kanawha City BC             | 4515 MacCorkle Avenue SE    | Kanawha County, WV    | Charleston     | WV    | 25304    | Brick & Mortar         | 3 - Middle Income        |
| 06169 Charleston Downtown BC      | 700 Virginia Street East    | Kanawha County, WV    | Charleston     | WV    | 25301    | Brick & Mortar         | 4 - Upper Income         |
| 03005 Teays Valley BC             | 3049 Mount Vernon Road      | Putnam County, WV     | Hurricane      | WV    | 25526    | Brick & Mortar         | 4 - Upper Income         |
| Fannin Street BC                  | 1001 Fannin                 | Harris County, TX     | Houston        | TX    | 77002    | Limited Purpose Branch | 4 - Upper Income         |
| Aurora Downtown Remote Drive Thru | 205 East Downer Place       | Kane County, IL       | Aurora         | IL    | 60505    | Remote Drive Thru      | 2 - Moderate Income      |
| Oak Park Remote Drive Thru        | 724 Harrison Street         | Cook County, IL       | Oak Park       | IL    | 60304    | Remote Drive Thru      | 4 - Upper Income         |
| South Chicago Remote Drive Thru   | 3017 E. 92nd St.            | Cook County, IL       | Chicago        | IL    | 60617    | Remote Drive Thru      | 2 - Moderate Income      |
| Skokie South Remote Drive Thru    | 4401 Oakton Street          | Cook County, IL       | Skokie         | IL    | 60076    | Remote Drive Thru      | 3 - Middle Income        |
| Petoskey Remote Drive Thru        | 500 Madison Street          | Emmet County, MI      | Petoskey       | MI    | 49770    | Remote Drive Thru      | 3 - Middle Income        |

| Name                             | Address                   | County              | City        | State | Zip Code | Service Type      | Census Tract Income 2024 |
|----------------------------------|---------------------------|---------------------|-------------|-------|----------|-------------------|--------------------------|
| Big Rapids Remote Drive Thru     | 228 South Michigan Avenue | Mecosta County, MI  | Big Rapids  | MI    | 49307    | Remote Drive Thru | 3 - Middle Income        |
| Cadillac Remote Drive Thru       | 115 East Cass Street      | Wexford County, MI  | Cadillac    | MI    | 49601    | Remote Drive Thru | 2 - Moderate Income      |
| Suttons Bay Remote Drive Thru    | 55 West Fourth Street     | Leelanau County, MI | Suttons Bay | MI    | 49682    | Remote Drive Thru | 3 - Middle Income        |
| Findlay Remote Drive Thru        | 300 East Sandusky Street  | Hancock County, OH  | Findlay     | OH    | 45840    | Remote Drive Thru | 3 - Middle Income        |
| Portsmouth Remote Drive Thru     | 826 7th Street            | Scioto County, OH   | Portsmouth  | OH    | 45662    | Remote Drive Thru | 1 - Low Income           |
| Lincoln Square Remote Drive Thru | 2420 West Lawrence        | Cook County, IL     | Chicago     | IL    | 60625    | Remote Drive Thru | 3 - Middle Income        |

**Approved by Unopened Fifth Third Bank Branches**

| Name                     | Address               | County                | City            | State | ZIP Code | Service Type   | Census Tract Income 2024 | Estimated Open Date | OCC approval date |
|--------------------------|-----------------------|-----------------------|-----------------|-------|----------|----------------|--------------------------|---------------------|-------------------|
| Viera BC                 | 2015 Viera Blvd       | Brevard County, FL    | Rockledge       | FL    | 32955    | Brick & Mortar | 4 - Upper Income         | 10/21/2025          | 6/30/2025         |
| Hays Farm BC             | 9030 Memorial Pkwy SW | Madison County, AL    | Huntsville      | AL    | 35802    | Brick & Mortar | 2 - Moderate Income      | 10/21/2025          | 7/21/2025         |
| Punta Gorda BC           | 120 W McKenzie St     | Charlotte County, FL  | Punta Gorda     | FL    | 33950    | Brick & Mortar | 3 - Middle Income        | 11/4/2025           | 6/30/2025         |
| Limestone Marketplace BC | 2101 Limestone Ridge  | Hall County, GA       | Gainesville     | GA    | 30501    | Brick & Mortar | 3 - Middle Income        | 11/6/2025           | 6/30/2025         |
| Okeechobee Boulevard BC  | 4871 Okeechobee Blvd  | Palm Beach County, FL | West Palm Beach | FL    | 33417    | Brick & Mortar | 1 - Low Income           | 11/10/2025          | 6/30/2025         |
| Champions Crossing BC    | 711 Champions Drive   | Polk County, FL       | Davenport       | FL    | 33897    | Brick & Mortar | 3 - Middle Income        | 11/12/2025          | 6/30/2025         |
| Town Commons BC          | 8819 Hypoluxo Rd      | Palm Beach County, FL | Lake Worth      | FL    | 33467    | Brick & Mortar | 4 - Upper Income         | 11/12/2025          | 7/21/2025         |
| Haile Plantation BC      | 2605 SW 91st Street   | Alachua County, FL    | Gainesville     | FL    | 32608    | Brick & Mortar | 3 - Middle Income        | 11/17/2025          | 6/30/2025         |
| Coquina Plaza BC         | 15891 Sheridan Street | Broward County, FL    | Davie           | FL    | 33331    | Brick & Mortar | 4 - Upper Income         | 11/18/2025          | 6/30/2025         |

| Name                  | Address                    | County                 | City          | State | ZIP Code | Service Type   | Census Tract Income 2024 | Estimated Open Date | OCC approval date |
|-----------------------|----------------------------|------------------------|---------------|-------|----------|----------------|--------------------------|---------------------|-------------------|
| Pulaski BC            | 5231 S Pulaski Rd          | Cook County, IL        | Chicago       | IL    | 60632    | Brick & Mortar | 2 - Moderate Income      | 11/24/2025          | 6/30/2025         |
| Walnut Creek BC       | 2478 Jonesboro Rd          | Henry County, GA       | Hampton       | GA    | 30228    | Brick & Mortar | 3 - Middle Income        | 11/24/2025          | 7/21/2025         |
| Pineda Commons BC     | 5175 N Wickham Rd          | Brevard County, FL     | Melbourne     | FL    | 32940    | Brick & Mortar | 4 - Upper Income         | 11/25/2025          | 4/30/2025         |
| Murfreesboro North BC | 3405 Memorial Blvd         | Rutherford County, TN  | Murfreesboro  | TN    | 37129    | Brick & Mortar | 4 - Upper Income         | 11/25/2025          | 5/20/2025         |
| Bonaire BC            | 506 GA-247                 | Houston County, GA     | Bonaire       | GA    | 31005    | Brick & Mortar | 4 - Upper Income         | 11/25/2025          | 7/21/2025         |
| Jerome Village BC     | 12133 Sycamore Trace       | Union County, OH       | Plain City    | OH    | 43064    | Brick & Mortar | 4 - Upper Income         | 12/2/2025           | 7/21/2025         |
| Nashville Road BC     | 2450 Nashville Rd          | Warren County, KY      | Bowling Green | KY    | 42101    | Brick & Mortar | 2 - Moderate Income      | 12/2/2025           | 8/25/2025         |
| Weaverville BC        | 150 Weaver Blvd            | Buncombe County, NC    | Weaverville   | NC    | 28787    | Brick & Mortar | 3 - Middle Income        | 12/3/2025           | 8/7/2025          |
| Newnan Crossing BC    | 1472 Newnan Crossing Blvd. | Coweta County, GA      | Newnan        | GA    | 30265    | Brick & Mortar | 3 - Middle Income        | 12/8/2025           | 7/21/2025         |
| Verdana BC            | 20001 Verdana Village Blvd | Lee County, FL         | Estero        | FL    | 33928    | Brick & Mortar | 3 - Middle Income        | 12/8/2025           | 7/21/2025         |
| Steele Creek BC       | 12811 S Tryon St           | Mecklenburg County, NC | Charlotte     | NC    | 28273    | Brick & Mortar | 3 - Middle Income        | 12/8/2025           | 7/21/2025         |
| Jensen Beach BC       | 4110 NW Federal Hwy        | Martin County, FL      | Jensen Beach  | FL    | 34957    | Brick & Mortar | 3 - Middle Income        | 12/16/2025          | 10/22/2024        |
| Plantation BC         | 10191 Cleary Blvd          | Broward County, FL     | Plantation    | FL    | 33324    | Brick & Mortar | 3 - Middle Income        | 12/16/2025          | 5/20/2025         |
| Pine Grove BC         | 7143 Wall Triana Highway   | Madison County, AL     | Madison       | AL    | 35757    | Brick & Mortar | 4 - Upper Income         | 12/16/2025          | 8/7/2025          |
| Golden Bear BC        | 1225 Rutland Dr            | Wilson County, TN      | Mount Juliet  | TN    | 37122    | Brick & Mortar | 4 - Upper Income         | 12/16/2025          | 8/25/2025         |
| Cane Bay BC           | 130 North Creek Drive      | Berkeley County, SC    | Summerville   | SC    | 29486    | Brick & Mortar | 3 - Middle Income        | 12/16/2025          | 9/16/2025         |
| One Nexton BC         | 1260 Nexton Parkway        | Berkeley County, SC    | Summerville   | SC    | 29486    | Brick & Mortar | 3 - Middle Income        | 12/16/2025          | 9/16/2025         |



| Name                     | Address                    | County                 | City              | State | ZIP Code | Service Type   | Census Tract Income 2024 | Estimated Open Date | OCC approval date |
|--------------------------|----------------------------|------------------------|-------------------|-------|----------|----------------|--------------------------|---------------------|-------------------|
| Mount Dora BC            | 19160 US Highway 441       | Lake County, FL        | Mt Dora           | FL    | 32757    | Brick & Mortar | 2 - Moderate Income      | 12/17/2025          | 8/25/2025         |
| Jonesville BC            | 14133 W Newberry Rd        | Alachua County, FL     | Newberry          | FL    | 32669    | Brick & Mortar | 4 - Upper Income         | 12/18/2025          | 8/25/2025         |
| Chapman BC               | 7609 Mountain Grove Dr     | Knox County, TN        | Knoxville         | TN    | 37920    | Brick & Mortar | 4 - Upper Income         | 12/19/2025          | 5/12/2025         |
| Becker Road BC           | 590 SE Becker Rd           | St. Lucie County, FL   | Port St. Lucie    | FL    | 34984    | Brick & Mortar | 4 - Upper Income         | 2/3/2026            | 8/7/2025          |
| Hampton Cove BC          | 111 Taylor Lane            | Madison County, AL     | Owens Cross Roads | AL    | 35763    | Brick & Mortar | 4 - Upper Income         | 2/10/2026           | 9/16/2025         |
| Belmont Town Center BC   | 975 S Point Rd             | Gaston County, NC      | Belmont           | NC    | 28012    | Brick & Mortar | 4 - Upper Income         | 2/24/2026           | 10/4/2025         |
| Westlawn BC              | 5213 Veterans Pkwy         | Rutherford County, TN  | Murfreesboro      | TN    | 37128    | Brick & Mortar | 4 - Upper Income         | 2/24/2026           | 9/16/2025         |
| Pooler BC                | 502 Pooler Pkwy            | Chatham County, GA     | Pooler            | GA    | 31322    | Brick & Mortar | 4 - Upper Income         | 3/3/2026            | 10/4/2025         |
| Saint Andrews BC         | 21060 St Andrews Blvd      | Palm Beach County, FL  | Boca Raton        | FL    | 33433    | Brick & Mortar | 4 - Upper Income         | 3/31/2026           | 9/16/2025         |
| Arboretum BC             | 3029 Pineville-Matthews Rd | Mecklenburg County, NC | Charlotte         | NC    | 28226    | Brick & Mortar | 4 - Upper Income         | 4/28/2026           | 4/24/2025         |
| Walker Farms BC          | 2300 Trenton Rd            | Montgomery County, TN  | Clarksville       | TN    | 37040    | Brick & Mortar | 2 - Moderate Income      | 5/26/2026           | 10/4/2025         |
| Holly Springs BC         | 7004 GB Alford Highway     | Wake County, NC        | Holly Springs     | NC    | 27540    | Brick & Mortar | 3 - Middle Income        | 5/26/2026           | 8/25/2025         |
| Salem Road Station BC    | 4271 Salem Road            | Newton County, GA      | Covington         | GA    | 30016    | Brick & Mortar | 2 - Moderate Income      | 6/9/2026            | 9/16/2025         |
| Covington Town Center BC | 12701 Town Center Drive    | Newton County, GA      | Covington         | GA    | 30014    | Brick & Mortar | 3 - Middle Income        | 6/16/2026           | 10/4/2025         |
| Franklin Township BC     | 8050 E Southport Rd        | Marion County, IN      | Indianapolis      | IN    | 46259    | Brick & Mortar | 4 - Upper Income         | 6/23/2026           | 10/4/2025         |

### Other Fifth Third Bank Office Locations<sup>2</sup>

| Name                                          | Address                                          | City              | State | Zip     | Activities                      |
|-----------------------------------------------|--------------------------------------------------|-------------------|-------|---------|---------------------------------|
| Birmingham - Commercial Temp BRO              | 2100 Southbridge Pkwy                            | Birmingham        | AL    | 35209   | Production Office               |
| Huntsville BRO                                | 7027 Old Madison Pike, NW                        | Huntsville        | AL    | 35806   | Production Office               |
| Equipment Finance Rocklin                     | 915 Highland Pointe Dr., Suite 250               | Roseville         | CA    | 95678   | Production Office               |
| Fresno Middle Markets BRO                     | 7621 North Del Mar Ave., Office Suite D          | Fresno            | CA    | 93711   | Production Office               |
| Denver BRO                                    | 1040 S Gaylord St                                | Denver            | CO    | 80209   | Production Office               |
| Denver Wealth BRO                             | 5500 Greenwood Plaza                             | Greenwood Village | CO    | 80111   | Production Office               |
| Washington DC - Rize BRO                      | 1025 Connecticut Avenue NW, Office 1028 and 1029 | Washington        | DC    | 20036   | Production Office               |
| Wilmington DE BRO                             | 3411 Silverside Rd                               | Wilmington        | DE    | 19810   | Trust/Fiduciary Services Office |
| Gainesville BRO - Retail Training             | 602 S Main St                                    | Gainesville       | FL    | 32601   | Production Office               |
| Macon BRO                                     | 1305 Hardeman Ave                                | Macon             | GA    | 31201   | Production Office               |
| South Atlanta BRO                             | 100 Hartsfield Centre Parkway                    | Atlanta           | GA    | 30354   | Production Office               |
| Bowling Green BRO                             | 2413 Nashville Road                              | Bowling Green     | KY    | 42101   | Production Office               |
| London Relo BRO                               | 1 Mayfair Place                                  | London            |       | W1J 8AJ | European Rep Office             |
| Rockville Virtual Office                      | One Research Court, Suite 450                    | Rockville         | MD    | 20850   | Production Office               |
| Provide - Minneapolis BRO                     | 729 N Washington Ave                             | Minneapolis       | MN    | 55401   | Production Office               |
| Commercial Kansas City BRO                    | 420 Nichols Rd., Floor 2                         | Kansas City       | MO    | 64112   | Production Office               |
| FTWA St. Louis - BRO                          | 2 Cityplace Dr                                   | Creve Coeur       | MO    | 63141   | Production Office               |
| Wilmington MLO                                | 1904 Eastwood Rd., Suite 306                     | Wilmington        | NC    | 28403   | Production Office               |
| Winston Salem Wealth BRO                      | 615 St George Square Ct., Ofc 301, 365, 366, 367 | Winston Salem     | NC    | 27103   | Production Office               |
| Provide - New York                            | 157 Columbus Avenue                              | New York          | NY    | 10023   | Production Office               |
| Provide - Portland East                       | 329 NE Couch St                                  | Portland          | OR    | 97232   | Production Office               |
| Columbia BRO                                  | 1122 Lady St                                     | Columbia          | SC    | 29201   | Production Office               |
| Fifth Third Healthcare Investment Banking BRO | 3800 North Lamar Blvd                            | Austin            | TX    | 78756   | Production Office               |
| Washington - Virtual Office                   | 11900 NE 1st St., Suite 300                      | Bellevue          | WA    | 98005   | Production Office               |
| Commercial Middle Market Greensboro           | 701 Green Valley Road, Suite 202                 | Greensboro        | NC    | 27408   | Production Office               |

<sup>2</sup> Excludes unoccupied locations pending lease expiration or sale, non-branch offices located within same building as an existing branch (branches already listed in Current Fifth Third Branches above), and unoccupied future locations under construction.

| Name                                           | Address                              | City          | State | Zip   | Activities        |
|------------------------------------------------|--------------------------------------|---------------|-------|-------|-------------------|
| Greenville Commercial & Wealth LPO             | 1 Augusta St., 3rd Floor             | Greenville    | SC    | 29601 | Production Office |
| Commercial Capital Markets Memphis             | 6410 Poplar Ave., Suite 151          | Memphis       | TN    | 38119 | Production Office |
| Richmond LPO                                   | 901 E. Byrd Street, Suite 1140       | Richmond      | VA    | 23219 | Production Office |
| Brighton                                       | 300 West North Street                | Brighton      | MI    | 48116 | Production Office |
| US 31 South                                    | 3535 South Airport Road West         | Traverse City | MI    | 49684 | Production Office |
| Fort Wayne Mortgage LPO                        | 10002 Auburn Park Dr.                | Fort Wayne    | IN    | 46825 | Production Office |
| CSC II                                         | 1830 East Paris Avenue SE            | Grand Rapids  | MI    | 49546 | Data Center       |
| Norwood Data Center                            | 4620 Wesley Ave                      | Cincinnati    | OH    | 45212 | Data Center       |
| Birmingham Temp Office                         | 2140 11th Ave South, Suite 215       | Birmingham    | AL    | 35205 | Production Office |
| Commercial Middle Market Newport Beach         | 500 Newport Center Drive, Suite 800  | Newport Beach | CA    | 92660 | Production Office |
| Park Plaza                                     | 4 Park Plaza, Suite 600              | Irvine        | CA    | 92614 | Production Office |
| Inland Empire Middle Market Office             | 3633 Inland Empire Blvd., Suite 920  | Ontario       | CA    | 91764 | Production Office |
| Dividend – San Francisco                       | One California Street, Suite 1500    | San Francisco | CA    | 94111 | Production Office |
| Dividend - San Diego                           | 3661 Valley Centre Drive, Suite 2500 | San Diego     | CA    | 92130 | Production Office |
| Commercial - Corporate Banking Los Angeles     | 1901 Avenue of the Stars, Suite 1450 | Los Angeles   | CA    | 90067 | Production Office |
| Bakersfield                                    | 11109 River Run Blvd., Suite 100     | Bakersfield   | CA    | 93311 | Production Office |
| Government Affairs                             | 801 Pennsylvania Ave. NW, Suite 212  | Washington    | DC    | 20004 | Operations Office |
| Fifth Third Center Naples                      | 999 Vanderbilt Beach Road            | Naples        | FL    | 34108 | Production Office |
| Kennedy                                        | 4427 West Kennedy Boulevard          | Tampa         | FL    | 33609 | Production Office |
| Commercial Middle Market Jacksonville Downtown | 225 Water Street                     | Jacksonville  | FL    | 32202 | Production Office |
| Commercial Miami                               | 8200 NW 41st St., Suite 310          | Doral         | FL    | 33166 | Production Office |
| Tampa Wealth Office                            | 4010 West Boy Scout Blvd, Ste 280    | Tampa         | FL    | 33607 | Production Office |
| Fifth Third Wealth Advisors - Naples Office    | 5801 Pelican Bay Blvd., Suite 404    | Naples        | FL    | 34108 | Production Office |
| Buckhead Terminus 200                          | 3333 Piedmont Road NE, Suite 1410    | Atlanta       | GA    | 30305 | Production Office |
| Savannah Middle Market Office                  | 114 Barnard St., Suite A             | Savannah      | GA    | 31401 | Production Office |

| Name                                          | Address                                      | City         | State | Zip   | Activities        |
|-----------------------------------------------|----------------------------------------------|--------------|-------|-------|-------------------|
| Freeport Wealth                               | 328 W. Stephenson St.                        | Freeport     | IL    | 61032 | Production Office |
| Westmont Operations Center                    | 910 Pasquinelli Dr                           | Westmont     | IL    | 60559 | Production Office |
| Northbrook Wealth Admin                       | 400 Skokie Boulevard, Suite 700              | Northbrook   | IL    | 60062 | Production Office |
| Springfield Wealth                            | 2041 West Iles, Suite A                      | Springfield  | IL    | 62704 | Production Office |
| Schilling Circle                              | 230 Schilling Cir                            | Hunt Valley  | MD    | 21031 | Production Office |
| Lake Lansing                                  | 2501 Coolidge Road                           | East Lansing | MI    | 48823 | Production Office |
| CSC I                                         | 1850 East Paris Avenue SE                    | Grand Rapids | MI    | 49546 | Operations Center |
| Detroit Main Office                           | 1 Woodward Avenue                            | Detroit      | MI    | 48226 | Production Office |
| Birmingham Wealth Management Office           | 300 Park St.                                 | Birmingham   | MI    | 48009 | Production Office |
| Clayton Centene                               | 7676 Forsyth Blvd., Suite 1820               | St. Louis    | MO    | 63105 | Production Office |
| Franklin Street – Raleigh Road                | 1450 Raleigh Road                            | Chapel Hill  | NC    | 27517 | Production Office |
| North Hills Midtown Plaza                     | 305 Church at North Hills Street, Suite 1000 | Raleigh      | NC    | 27609 | Production Office |
| Charlotte Wealth                              | 101 North Tryon St                           | Charlotte    | NC    | 28202 | Production Office |
| Dividend - Las Vegas                          | 10100 W. Charleston Blvd., Suite 200         | Las Vegas    | NV    | 89135 | Production Office |
| Rockefeller Plaza                             | 50 Rockefeller Plaza, Suite 1101             | New York     | NY    | 10020 | Production Office |
| NY Wealth                                     | 580 White Plains Rd., Suite 210              | Tarrytown    | NY    | 10591 | Production Office |
| Tylersville Square - Retail                   | 7810 Tylersville Square Drive                | West Chester | OH    | 45069 | Production Office |
| Securities Delaware (OC)                      | 15 West Central Avenue                       | Delaware     | OH    | 43015 | Securities Office |
| Lane Avenue Wealth and Asset Management       | 1819 West Lane                               | Columbus     | OH    | 43221 | Production Office |
| 5/3 Community Development Corporation         | 5747 Perimeter Drive, Suite 253              | Dublin       | OH    | 43017 | Production Office |
| Montgomery Private Bank                       | 9280 Montgomery Rd, Suite 300                | Cincinnati   | OH    | 45242 | Production Office |
| Madisonville Office Building                  | 5001 Kingsley Drive                          | Cincinnati   | OH    | 45227 | Operations Center |
| The George A. Schaefer, Jr. Operations Center | 5050 Kingsley Drive                          | Cincinnati   | OH    | 45227 | Operations Center |
| Provide - Columbus                            | 500 South Front Street, Ste. 1150            | Columbus     | OH    | 43215 | Production Office |
| Tylersville Square - Commercial               | 7820 Tylersville Square Drive                | West Chester | OH    | 45069 | Production Office |
| Gulf Tower – Liberty                          | 1001 Liberty Ave., Suite 700                 | Pittsburgh   | PA    | 15222 | Production Office |
| Pittsburgh Wealth                             | 1603 Carmody Ct                              | Sewickley    | PA    | 15143 | Production Office |
| Commercial Charleston Admin                   | 1080 Morrison Dr, Suite 101                  | Charleston   | SC    | 29403 | Production Office |

| Name              | Address                                | City       | State | Zip   | Activities        |
|-------------------|----------------------------------------|------------|-------|-------|-------------------|
| Commercial Dallas | 5400 LBJ Freeway, Suite 825            | Dallas     | TX    | 75240 | Production Office |
| Dividend – Austin | 4001 Parmer Lane, Suite 225            | Austin     | TX    | 78727 | Production Office |
| East Wisconsin    | 250 East Wisconsin Ave.,<br>Suite 1550 | Milwaukee  | WI    | 53202 | Production Office |
| UC iHub           | 2900 Reading Rd., Suite 250            | Cincinnati | OH    | 45206 | Production Office |

**Public Exhibit 12**

**Description of Comerica Subsidiaries**

**Subsidiaries of Comerica Incorporated, Comerica Bank, Comerica Bank & Trust and Their Activities**

**Part A: Subsidiaries of Comerica Incorporated**

| Name                                        | Main Office Address                                                                                     | Name of Immediate Parent      | Percentage Owned | Business Activity/Purpose of Subsidiary                                                                    | Legal Authority <sup>1</sup>                        | Explanatory Notes |
|---------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------|------------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|-------------------|
| Comerica Bank                               | 1717 Main Street Dallas, TX 75201                                                                       | Comerica Incorporated         | 100%             | Texas State-Chartered Member Bank                                                                          | Bank Holding Company Act                            |                   |
| Comerica Holdings Incorporated              | 1717 Main Street Dallas, TX 75201                                                                       | Comerica Incorporated         | 100%             | Bank Holding Company                                                                                       | N/A. Will be merged into Fifth Third Financial.     |                   |
| Comerica Bank & Trust, National Association | 101 North Main Street, Ann Arbor, MI 48104                                                              | Comerica Holding Incorporated | 100%             | Limited Purpose National Trust Bank                                                                        | N/A. Will be merged into Fifth Third Bank.          |                   |
| Comerica Assurance Ltd.                     | Conyers Corporate Services (Bermuda) Limited, Clarendon House, 2 Church Street, Hamilton HM 11, Bermuda | Comerica Incorporated         | 100%             | Bermuda Captive Insurance Company                                                                          | 12 USC 1843(c)(1); 12 CFR 225.22(b); 12 CFR 225.141 |                   |
| Comerica Capital Advisors Incorporated      | 1521 Concord Pike Suite 201, Wilmington, DE 19803                                                       | Comerica Incorporated         | 100%             | Exclusively provides services to Comerica and its subsidiaries, including administering Comerica’s warrant | 12 USC 1843(c)(1); 12 CFR 225.22(b); 12 CFR 225.141 |                   |

<sup>1</sup> For Fifth Third, indirectly, and Fifth Third Financial, directly, to hold the entity.

| Name                           | Main Office Address                                    | Name of Immediate Parent               | Percentage Owned | Business Activity/Purpose of Subsidiary                                                                                                                         | Legal Authority <sup>1</sup>                                                  | Explanatory Notes |
|--------------------------------|--------------------------------------------------------|----------------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|-------------------|
|                                |                                                        |                                        |                  | holdings and Comerica's merchant banking investments.                                                                                                           |                                                                               |                   |
| Comerica Ventures Incorporated | 1717 Main Street Dallas, TX 75201                      | Comerica Capital Advisors Incorporated | 100%             | Exclusively provides services to Comerica and its subsidiaries, including administration of, recording-keeping and reporting related to Comerica's investments. | 12 USC 1843(c)(1); 12 CFR 225.22(b); 12 CFR 225.141                           |                   |
| USB RETC FUND 2020-23 LLC      | 1807 Washington Avenue, Suite 300, St. Louis, MO 63103 | Comerica Capital Advisors Incorporated | 100%             | Solar Investment Holding Company                                                                                                                                | 12 USC 1843(k)(merchant banking authority) or 12 USC 1843(c)(6) <sup>2</sup>  |                   |
| B&G Tax Equity Partnership LLC | Trolley Square, Suite 20C, Wilmington, DE 19806        | USB RETC FUND 2020-23 LLC              | 98.01%           | Solar Investment Holding Company                                                                                                                                | 12 USC 1843(k) (merchant banking authority) or 12 USC 1843(c)(6) <sup>3</sup> |                   |
| Briel Farm Solar LLC           | Trolley Square, Suite 20C, Wilmington, DE 19806        | B&G Tax Equity Partnership LLC         | 100%             | Solar Power Facility                                                                                                                                            | 12 USC 1843(k)(merchant banking authority) or 12 USC 1843(c)(6) <sup>4</sup>  |                   |

<sup>2</sup> See Confidential Exhibit 17 for additional information.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*



| Name               | Main Office Address                             | Name of Immediate Parent       | Percentage Owned | Business Activity/Purpose of Subsidiary | Legal Authority <sup>1</sup>                                                 | Explanatory Notes |
|--------------------|-------------------------------------------------|--------------------------------|------------------|-----------------------------------------|------------------------------------------------------------------------------|-------------------|
| Gardy’s Mill Solar | Trolley Square, Suite 20C, Wilmington, DE 19806 | B&G Tax Equity Partnership LLC | 100%             | Solar Power Facility                    | 12 USC 1843(k)(merchant banking authority) or 12 USC 1843(c)(6) <sup>5</sup> |                   |

\*\*\*\*\*

---

<sup>5</sup> *Id.*

**Part B: Subsidiaries of Comerica Bank**

| Name                         | Main Office Address               | Name of Immediate Parent | Percentage Owned | Business Activity/Purpose of Subsidiary | Legal Authority <sup>6</sup>                                                                                                                                                                                                                                                                                                 | Explanatory Notes |
|------------------------------|-----------------------------------|--------------------------|------------------|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Comerica Leasing Corporation | 28175 Haggerty Rd, Novi, MI 48377 | Comerica Bank            | 100%             | Equipment Leasing                       | 12 U.S.C. § 1843(c)(5); 12 C.F.R. 225.22(e)(1); 12 C.F.R. § 23.7; OCC Interpretive Letter No. 567, reprinted in [1991-1992 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 83,337 (October 29, 1991); OCC Interpretive Letter No. 556, reprinted in [1991-1992 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 83,306 (August 6, |                   |

<sup>6</sup> Authority for Fifth Third and Fifth Third Financial, indirectly, and for Fifth Third Bank, directly, to own the equity.

|                                    |                                                                                |               |      |                                                                                   |                                                                       |  |
|------------------------------------|--------------------------------------------------------------------------------|---------------|------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------|--|
|                                    |                                                                                |               |      |                                                                                   | 1991).                                                                |  |
| Comerica Investment Services, Inc. | 28175 Haggerty Rd, Novi, MI 48377                                              | Comerica Bank | 100% | Holding Company for Indirect Subsidiaries of Comerica Bank                        | 12 U.S.C. § 1843(c)(5);12 CFR 5.34(f)(5)(i)                           |  |
| Comerica Management Company        | 28175 Haggerty Rd, Novi, MI 48377                                              | Comerica Bank | 100% | Leases employees to Comerica's operating entities                                 | 12 C.F.R. 225.22(e)(1); 12 CFR 5.34(f)(5)(ii)                         |  |
| Comerica Properties Corporation    | 28175 Haggerty Rd, Novi, MI 48377                                              | Comerica Bank | 100% | Formed to serve as a real estate management company for Comerica's own properties | 12 U.S.C. § 1843(c)(5); 12 CFR 5.34(f)(5)(ii)                         |  |
| Silver Funding Corp.               | c/o Capitol Services, Inc., 615 S. DuPont Hwy, Dover, DE 19901, County of Kent | Comerica Bank | 100% | Special purpose entity used for historical securitization transaction             | 12 U.S.C. § 1843(c)(5); 12 C.F.R. 225.22(e)(1); 12 CFR 5.34(f)(5)(iv) |  |
| VRB Corp.                          | 28175 Haggerty Rd, Novi, MI 48377                                              | Comerica Bank | 100% | ORE property                                                                      | 12 U.S.C. § 1843(c)(5); 12 U.S.C. 29; 12 CFR Part 34 Subpart E        |  |
| Comerica Financial Incorporated    | 28175 Haggerty Rd, Novi, MI 48377                                              | Comerica Bank | 100% | Created to hold certain loans                                                     | 12 C.F.R. 225.22(e)(1); 12 CFR 5.34(f)(5)(i)                          |  |
| SCFS Reverse                       | 1209 Orange Street,                                                            | Comerica Bank | 100% | Holding Company for                                                               | 12 U.S.C. § 1843(c)(5);                                               |  |

|                                         |                                                                                                                                                                   |               |      |                                                                                                                                                  |                                                                                                                                             |  |
|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|------|--------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|--|
| Exchange, LLC                           | Wilmington, DE 19081, County of New Castle                                                                                                                        |               |      | Reverse Exchange Limited Liability Companies                                                                                                     | 12 U.S.C. § 24(Seventh); 12 C.F.R. § 5.34(e); see also OCC Conditional Approval #706 (Nov. 2005); OCC Conditional Approval #869 (Aug. 2008) |  |
| Cass & Co.                              | CIBC Caribbean Bank & Trust Company (Cayman) Limited P.O. Box 694GT, CIBC First Caribbean House, 25 Main Street George Town, Grand Cayman KY1-1107 Cayman Islands | Comerica Bank | 100% | Used as a trust or custodial nominee to facilitate the trading of securities owned by offshore Comerica clients with trust or custodial accounts | 12 C.F.R. 225.22(e)(1); 12 CFR 5.34(f)(5)(ii)                                                                                               |  |
| VRB Marketplace of Rochester Hills, LLC | 1521 Concord Pike Suite 201, Wilmington, DE 19803                                                                                                                 | VRB Corp.     | 100% | ORE property                                                                                                                                     | 12 U.S.C. § 1843(c)(5); 12 U.S.C. 29; 12 CFR Part 34 Subpart E                                                                              |  |
| VRB Comfort, LLC                        | 1521 Concord Pike Suite 201, Wilmington, DE 19803                                                                                                                 | VRB Corp.     | 100% | ORE property                                                                                                                                     | 12 U.S.C. § 1843(c)(5); 12 U.S.C. 29; 12 CFR Part 34 Subpart E                                                                              |  |

|                                   |                                                   |                                    |      |                                                                                                                                                                                                                     |                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------|---------------------------------------------------|------------------------------------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| VRB Red Oak, LLC                  | 1521 Concord Pike Suite 201, Wilmington, DE 19803 | VRB Corp.                          | 100% | ORE property                                                                                                                                                                                                        | 12 U.S.C. § 1843(c)(5);<br>12 U.S.C. 29;<br>12 CFR Part 34 Subpart E |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| VRB Ocala Ranch LLC               | 1521 Concord Pike Suite 201, Wilmington, DE 19803 | VRB Corp.                          | 100% | ORE property                                                                                                                                                                                                        | 12 U.S.C. § 1843(c)(5);<br>12 U.S.C. 29;<br>12 CFR Part 34 Subpart E |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Comerica Securities, Inc.         | 28175 Haggerty Rd, Novi, MI 48377                 | Comerica Investment Services, Inc. | 100% | Registered Broker/Dealer                                                                                                                                                                                            | 12 USC 24a;12 CFR 5.39                                               | Registered with the Securities and Exchange Commission.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Comerica Insurance Group, Inc.    | 28175 Haggerty Rd, Novi, MI 48377                 | Comerica Investment Services, Inc. | 100% | Holding Company for Insurance Subsidiaries                                                                                                                                                                          | 12 C.F.R. 225.22(e)(1);<br>12 CFR 5.34(f)(5)(i)                      | Entity conducts no new insurance activity. Currently receiving a small (less than \$100,000 year to date) revenue stream from legacy accounts not transferred to Ameriprise.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Comerica Insurance Services, Inc. | 28175 Haggerty Rd, Novi, MI 48377                 | Comerica Insurance Group, Inc.     | 100% | Supports certain legacy outside business activities pertaining to fixed life insurance. Additionally, Comerica Insurance Services, Inc. supports legacy group accident, death and dismemberment insurance contracts | 12 C.F.R. 5.39(e)                                                    | <p>Qualified to do business in Florida, Kentucky, Massachusetts, Maryland, North Carolina, Nevada, Texas and Virginia.</p> <p>Active Agency Licenses: Florida, Maryland, Michigan, Missouri, Nebraska, Tennessee, Texas.</p> <p>Pending Agency Licenses: Arizona, California, Colorado.</p> <p>Active Designated Responsible License Person (“<u>DRLP</u>”): Arkansas, Arizona, California, Colorado, Connecticut, Delaware, Georgia, Hawaii, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Maine, Missouri, Mississippi, Montana, North Carolina, North Dakota, New Hampshire, New Jersey, New Mexico, Nevada, New York, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Virginia, Vermont, Wisconsin, West Virginia, Wyoming.</p> <p>Pending DLRP: Washington.</p> |
| Comerica Insurance                | 4265 San Felipe, #1100 Houston,                   | Comerica Insurance                 | 100% | Supports certain legacy outside                                                                                                                                                                                     | 12 C.F.R. 5.39(e)                                                    | Pending Agency Licenses: Texas                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                                            |                                                  |                                |      |                                                                                        |                   |                                                                               |
|--------------------------------------------|--------------------------------------------------|--------------------------------|------|----------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------|
| Services of Texas Incorporated             | TX 77027                                         | Group, Inc.                    |      | business activities pertaining to fixed life insurance                                 |                   |                                                                               |
| Interstate Select Insurance Services, Inc. | 7801 Folsom Boulevard #202, Sacramento, CA 95826 | Comerica Insurance Group, Inc. | 100% | Supports certain legacy outside business activities pertaining to fixed life insurance | 12 C.F.R. 5.39(e) | Qualified to do business in Texas and Utah.<br><br>No active agency licenses. |