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****Via Secure Email****

April 22, 2022

Board of Directors
Northpointe Bank
3333 Deposit Drive NE
Grand Rapids, MI 49546

RE: Community Reinvestment Act (CRA) Strategic Plan Approval

Members of the Board:

This letter is to inform you that the FDIC has approved the Strategic Plan (Plan) last submitted by Northpointe Bank (Bank) via email from Vice President, Chief Compliance Officer & Regulatory Counsel Shannon M. Howe to our office on April 21, 2022. The effective date of the Plan is January 1, 2022, and it has a term of five years. A copy of the Plan is enclosed for your records.

Section 345.27(a)(4) of the FDIC's Rules and Regulations requires the Bank to operate under the Plan for at least one year before the FDIC can evaluate your performance under the Plan. Therefore, the earliest that your institution will be evaluated under the Plan is January 1, 2023. This approval is based primarily on the Bank's lending commitments and supported through the community development investment and service goals. If there are any modifications to the Bank's business strategy during the Plan's duration that may have a material effect on the approved performance targets, please advise the Chicago Regional Office to determine whether an amendment to the Plan is appropriate. Should you subsequently decide to terminate the Plan or upon expiration of the Plan, the Bank would be evaluated under the standards listed in Section 345.21(a)(1) of the FDIC Regulations for large banks or Section 345.21(a)(3) for small banks, based on the applicable asset size classification at that time.

In addition, please be advised that Part 345 of the regulations addresses the impact of discriminatory or other illegal credit practices on an institution's CRA rating. An institution's CRA rating could be adversely impacted by the presence of discriminatory or other illegal credit practices, irrespective of the achievement of its CRA goals established in the Plan.

Thank you for your cooperation during the review process, and we look forward to the accomplishment of the goals set forth in the Plan. If you have any questions, please contact Review Examiner David Lafleur at (312) 718-8045.

Sincerely,

Teresa M. Sabanty
Deputy Regional Director

Enclosure

Northpointe Bank

CRA STRATEGIC PLAN

January 1, 2022

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I. INTRODUCTION

Northpointe Bank (“Northpointe” or the “Bank”) opened for business on May 21, 1999 under the parent company Northpointe Bancshares, Inc. The Bank’s main office is in Grand Rapids, Michigan, which is located in Kent County, Michigan. The Bank also has loan production offices (“LPOs”) in the states of Michigan, Alabama, California, Colorado, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kentucky, Massachusetts, Nevada, New Jersey, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, and Washington. These loan production offices will not have a role within this Community Reinvestment Act (“CRA” or the “Act”) Strategic Plan (the “Strategic Plan” or the “Plan”) as they are located outside of Kent County, Michigan. In addition, the Bank currently has no other affiliates or subsidiaries that will be involved with the Strategic Plan.

This is the third Strategic Plan for Northpointe, and it will cover the period of January 1, 2022 to December 31, 2026. The first CRA Strategic Plan, which was adopted and approved, covered the period of July 1, 2013 to December 31, 2016. The second CRA Strategic Plan, which was also adopted and approved, covered the period of January 1, 2017 to December 31, 2021.

Northpointe’s mission is to be the best bank in America by bringing value and innovation to the people we serve. We do this by:

- Differentiating ourselves by providing innovative products, exceptional service, and superior technology to our customers;
- Empowering our employees to exceed our customers’ expectations, delivering convenient, innovative technology, and supporting our employees and the communities we serve;
- Striving to treat others better than we expect to be treated, like a friend, neighbor, or family member;
- Building trusted, lifelong relationships with our customers, employees, and the communities we serve by acting with integrity at all times;
- Delivering added value to our customers’, employees’, and shareholders’ lives through a collaborative, high performance, diverse culture; and
- Enabling each employee to make decisions that benefit our clients and promote success for the company.

Northpointe Bank has provided more than 22 years of quality service to its customers, primarily offering mortgage loans for home purchase and refinance, and continues to provide innovative products to its customers. As most of the Bank’s customers are individuals, the Bank’s product line is focused on consumer retail banking products. Northpointe Bank provides financing for various types of mortgage loans, including FHA, VA, and conventional loans, and sells the majority of its loans into the secondary market. The Bank also offers both commercial and personal deposit accounts, from interest bearing checking accounts to certificates of deposit. Northpointe Bank is an FDIC member and an equal housing lender.

Other differentiating features of the Bank's business model include a(n):

- Extensive use of an internet delivery channel for product marketing and client service;
- Limited product set focused primarily on individual consumers; and
- Limited array of consumer credit products with a strong mortgage orientation.

As an FDIC-insured and state-chartered non-member bank, Northpointe is subject to the regulations promulgated by the FDIC, including regulations under the CRA. Congress passed the CRA in 1977. In 1995, the current interagency regulations implementing the Act became effective. For banks such as Northpointe, these regulations use a lending test that measures and evaluates the bank's lending activity within a physical geographically based assessment area. The lending test does not, however, adequately consider the situation of a single-branch bank, such as Northpointe, which serves customers throughout the country and which does not have a significant concentration of loans within its designated assessment area. As an alternative to this standard evaluation method, the regulations permit a bank to comply with the CRA by electing to implement an approved strategic plan. Accordingly, the Bank has elected to operate under this Strategic Plan in order to satisfactorily fulfill its CRA obligations.

II. BACKGROUND

History of the Bank

Northpointe Bank is a wholly owned subsidiary of Northpointe Bancshares, Inc. The Bank is headquartered and operates from its main office in Grand Rapids, Michigan. The Bank was chartered by the State of Michigan in 1999 and is regulated by the Michigan Department of Insurance and Financial Services ("DIFS") at the state level, and by the FDIC at the federal level. As noted above, and in addition to its main, full service facility, the Bank also has LPOs in the states of Michigan, Alabama, California, Colorado, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kentucky, Massachusetts, Nevada, New Jersey, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, and Washington. In 2016, the Bank acquired mortgage personnel from Renasant Bank (f/k/a Heritage Bank). These lending and operations personnel are located in the Colorado, Florida, and Georgia offices. In 2018, the Bank acquired 13 additional mortgage offices from Home Point Financial, primarily located in Ohio, New Jersey, Pennsylvania, Rhode Island, and Connecticut.

Initially, the Bank focused on originating and holding non-conforming residential mortgage loans, which did not meet the criteria for sale into the secondary market. This strategy was successful until the 2008 collapse of the residential real estate market and ensuing recession. To return to profitability while under the constraints of limited capital, the Bank made substantial changes to its business model. The Bank's recovery plan focused on growing revenues earned from originating and selling conforming residential first mortgages into the secondary market.

Today, Northpointe operates through four primary business units: Correspondent Lending, Retail Lending, Mortgage Servicing, and a Mortgage Purchase Program, as well as several support departments which are driven to support the overall initiatives of the Bank. In addition to mortgages originated at its main office and LPOs, the Bank receives referrals from residential realtors and real estate-related internet sites. After origination, the loans are typically sold to investors in the secondary market. Efforts to expand the direct origination program are currently focused on internet-based originations, as well as the various LPOs. The Bank is continually working on upgrading its website and streamlining the online application process as management feels this is a more cost-effective way to grow retail mortgage originations.

Bank Financial Information

As of July 30, 2021, the Bank's Report of Condition and Income reported total assets of \$3.7 billion, total liabilities of \$3.3 billion, and total equity capital of \$393.2 million. The Bank's assets were comprised of \$182.2 million in cash and deposits, \$6.6 million in investment securities, \$1.4 billion in mortgage loans held for sale, \$1.9 billion in loans, and \$247.9 million in fixed and other assets. The Bank's funding was provided primarily by deposits, including \$2.24 billion in consumer and business deposits with the Bank and \$1.1 billion in advances from the Federal Home Loan Bank. The Bank's tier one capital of \$386.0 million represents 11.21% of the Bank's risk-weighted assets.

As of July 30, 2021, the Bank had approximately \$2.24 billion in deposits; of which about \$300.4 million consisted primarily of large deposits held by other financial institutions outside of our assessment area, and \$1.032 billion consisted of brokered deposits. The remaining amount of approximately \$910.1 million were deposits from consumers and small businesses, of which, a significant portion of \$374.2 million (41%) were from Kent County, Michigan. The Bank has delineated Kent County, Michigan as its CRA assessment area because the Bank's only branch and the only deposit-taking ATM are both located in Kent County, which is buttressed by the portion of the Bank's consumer and small business deposits there.

Current Product and Services

The Bank does not have a large network of branches, as the Bank has one banking office in Grand Rapids, Michigan and one ATM, also located in Grand Rapids. This office is located in census tract 118.03 with an address of 3333 Deposit Drive NE, Grand Rapids, MI 49546. A map and list of census tracts for the assessment area are contained in Appendix B of this Strategic Plan. The Bank services the vast majority of its customers by alternative delivery systems including the internet, telephone, and mail.

The Bank offers a full range of deposit products, including interest-bearing checking accounts, statement savings accounts, certificates of deposit, and money market deposit accounts.

The Bank primarily offers retail residential mortgage loan products to consumers throughout West Michigan and throughout the United States for home purchase and

refinance. The Bank's products and services are widely available and publicly marketed. Given the interest rate risk, these mortgage loans are usually sold to investors in the secondary market. Northpointe Bank generally does not originate non-real estate consumer loans and is currently not actively originating new commercial loans. Northpointe Bank is approved by both Fannie Mae and Freddie Mac to sell directly to these federal agencies. In addition, the Bank is a member of the Federal Home Loan Bank of Indianapolis ("FHLB Indianapolis") and sells loans directly to this agency as well.

The Bank offers a variety of mortgage loan products, including products to assist low- and moderate-income ("LMI") individuals and families, such as standard conforming and FHA programs that allow down payments as low as 3%. In addition, the Bank offers VA and rural housing programs which allow up to 100% financing with a minimum borrower contribution. Northpointe Bank is approved by the Michigan State Housing Development Authority ("MSHDA") to provide loans with down payment assistance for first time home buyers. The Bank participates with the Michigan Homeowner Assistance Nonprofit Corporation, acting through MSHDA, to provide qualified borrowers with principal reductions pursuant to the Principal Curtailment Program. The Bank also works with the FHLB Indianapolis to provide financial assistance through their Neighborhood Impact Programs ("NIP") and the Accessibility Modifications Program ("AMP"). Employees of the Bank work with non-profit organizations and local building contractors to provide assistance to low-income and disabled homeowners to renovate properties within the assessment area.

Refer to Appendix C for detailed data on the Bank's loan portfolio as of December 31, 2020.

Kent County, Michigan

Kent County, Michigan is included within the Grand Rapids-Kentwood Metropolitan Statistical Area ("MSA"). Kent County is the fourth most populous county in Michigan with a total estimated population of about 656,955, which is made up of 241,746 households according to the 2019 census data. The United States Census bureau estimates that the population as of July 1, 2019 has increased by 9.0% since April 1, 2010.

Based on Federal Financial Institutions Examination Council (FFIEC) census data, the 2021 estimated annual median family income (AMI) for the Grand Rapids-Kentwood MSA is \$76,600.

Based on this data, family incomes for 2021 are classified as follows:

Low Income (less than 50 percent of the AMI), or \$38,300.

Moderate income (at least 50 percent and less than 80 percent of the AMI) or amounts between \$38,300 and \$61,280.

Middle income level (at least 80 percent and less than 120 percent of the AMI) or amounts between \$61,280 and \$91,920.

Upper income (over 120 percent of the AMI) or amounts over \$91,920.

Below, Exhibit 1 details the number and percentages of families in the respective income categories within Kent County based on the number of families and 2020 estimated median income levels:

Exhibit 1: Kent County Family Income Levels

Income Level	# Families	% of Families
Low	7,617	4.9%
Moderate	30,882	20.0%
Middle	65,906	42.7%
Upper	50,012	32.4%
Total	154,417	100.0%

Source: 2020 FFIEC Census Report – Summary Census Demographic Information

LMI families combined represent 24.9% of the total families within the assessment area, and nearly 85% of the county's population is above the poverty level (see Exhibit 2).

Exhibit 2 details the 128 census tracts located in Kent County, of which 11 (8.6%) are considered to be low-income, with a total population of 38,310 or 6.2% of the total county population. Moderate-income census tracts total 31 (24.2%), with a population of 137,681 or 22.1% of the total county population. Middle- and upper-income census tracts make up about 67.2% of the total census tracts.

Exhibit 2: Kent County Census Tracts

Income Level	# of Tracts	% of Tracts	Population	% of Population	% of Individuals above Poverty
Low	11	8.6%	38,310	6.2%	53.1%
Moderate	31	24.2%	137,681	22.1%	75.8%
Middle	54	42.2%	261,075	41.9%	88.2%
Upper	32	25.0%	185,524	29.8%	93.1%
Total	128	100.0%	622,590	100.0%	84.7%

LMI census tracts total 42 (32.8%) and represent 28.3% of the population of Kent County.

Loans within Kent County, Michigan

Northpointe Bank's business model, with its emphasis on internet banking, has historically been limited in the number of mortgages that the Bank originates within its assessment area due to its relative size and number of geographic locations compared with its competition. The Banks' competitors capture the majority of the real estate lending market within Kent County, Michigan due to their branch networks, greater brand recognition, more on-the-ground loan officers, and a wholesale lending presence. FDIC data, for example, shows there are 24 FDIC insured depository institutions with 169

offices in Kent County. Accordingly, the Bank’s overall growth is not correlated with the same rate of growth within Kent County.

Exhibits 3 and 4 provide historical lending data for Bank performance context. Exhibit 3 details the number and amount of mortgage loans originated by Northpointe Bank in Kent County from 2017-2019, as well as the Bank’s lending to LMI borrowers and in LMI census tracts.

Exhibit 3: Northpointe Bank Loans in Kent County, 2017-2019

	Total Loans Originated in Kent County		Loans Originated in Kent County to LMI Borrowers				Loans Originated in Kent County in LMI Census Tracts			
	#	\$(000s)	#	\$(000s)			#	\$(000s)		
2017	233	44,421	62	7,044			42	5,105		
2018	223	44,055	57	7,618			43	5,522		
2019	416	86,172	107	14,975			116	16,508		
Total	872	174,648	226	25.9%	29,637	17.0%	201	23.1%	27,135	15.5%

Source: Northpointe CRA Performance Evaluation, Sept. 1, 2020

For the three years ending December 31, 2019, Northpointe Bank originated on average about 17.0% of its dollar loan volume (25.9% by number of loans) to LMI families, and about 15.5% of its dollar loan volume (23.1% by number of loans) in LMI areas.

Exhibit 4 shows the Kent County lending for Northpointe as well as four “peer” banks in our assessment area, in order of percentage of LMI loans originated. Comparisons are made based on 2020 HMDA data for loans on 1-4 family and manufactured home dwellings. The table details the number and dollar value of loans originated within Kent County, as well as each institution’s level of lending in LMI census tracts. Due to the significant change in the home ownership market arising with the Covid-19 pandemic, mortgage originations increased significantly nationwide, making the 2020 figures most relevant for peer and market analysis for lending projections going forward.

Exhibit 4: Peer Bank Lending in Kent County, 2020

	Total Assets 12/31/2020 (in millions)	Total Loans Originated in Kent County		Total LMI Loans Originated Within Kent County Census Tracts			
		#	Amount	#	%	\$	%
Aggregate MSA Reporters		36,748	\$7,824,540,000	6,277	17.1%	\$1,165,475,000	14.9%
Northpointe Bank	\$3,305	651	\$149,185,000	107	16.4%	\$16,835,000	11.3%
United Bank of Michigan	\$800	545	\$115,545,000	82	15.0%	\$16,505,000	14.3%
Macatawa Bank	\$2,641	291	\$74,035,000	43	14.8%	\$6,875,000	9.3%
Independent Bank	\$4,203	1,266	\$278,850,000	164	13.0%	\$22,490,000	8.1%
Mercantile Bank	\$4,418	1,005	\$262,005,000	89	8.6%	\$24,845,000	9.5%

Source: 2020 HMDA Data, Disposition of loan applications, by location of property and type of loan

Importantly, all the peer institutions listed in the above Exhibit have multiple branches, whereas Northpointe Bank has only one branch in Grand Rapids. Still, Northpointe Bank, with its single location, reported the largest percentage of its total loans in LMI areas than any of these peer financial institutions, and also reported the second largest percentage of its loans in LMI census tracts by dollar value.

III. STRATEGIC PLAN GOAL, IMPLEMENTATION, EFFECTIVE DATE AND TERM

CRA Strategic Plan Goal

Northpointe Bank elects to utilize a strategic plan as an alternative method of assessing the Bank's CRA performance record, in accordance with 12 CFR § 345.27. The submission of a strategic plan allows the Bank to meet its CRA obligations more effectively by better leveraging the strengths of its business model. As noted above, the Plan will cover the Bank's designated assessment area of Kent County, Michigan.

Northpointe's management has set a goal of meeting or exceeding the metrics outlined in the Plan for satisfactory lending, investment, and service levels in each of the covered years of 2022-2026. It is the Bank's intention that by meeting these goals, it will also help to meet the needs of its assessment area communities. The Bank has identified the following areas of concentration for its CRA efforts:

- Affordable housing for LMI individuals;
- Economic development and revitalization; and
- Other services dedicated to serving LMI individuals and families.

Implementation

The Bank's Board of Directors Audit Committee is charged with the responsibility of administering the Bank's CRA program. The Board Audit Committee and other management committees ensure that adequate resources are dedicated to the CRA Program to implement the Plan.

The Bank has appointed a senior officer as the Bank's CRA Officer, with the responsibility to oversee community outreach and the identification of CRA related lending, investment, and service opportunities. The diverse backgrounds of other Audit Committee members help ensure that the Plan is administered effectively.

Effective Date and Term

Northpointe Bank anticipates that it will receive approval for the Strategic Plan from the FDIC and will implement the plan on or about **January 1, 2022.**

Northpointe's Board of Directors and management will oversee the Bank's progress in meeting the Plan's objectives. The Bank will request FDIC approval to modify or amend the Plan only if there is a material change in its underlying assumptions or with the Bank's

mission, objectives or operations, and such changes would make the Plan no longer appropriate or viable. In such event, Northpointe Bank will administer the modified or amended plan in accordance with the FDIC's regulatory requirements, time frames, and guidelines for approval of a CRA strategic plan.

Northpointe Bank plans to operate under this Strategic Plan **from January 1, 2022 to December 31, 2026**. A new strategic plan will be developed for the Bank when this term has expired.

IV. PUBLIC PARTICIPATION AND PROCESS

In accordance with CRA regulations, a bank seeking approval of a CRA strategic plan is to perform a number of tasks associated with the submission process. In addition to seeking review by the Audit and Management Committees, the Plan received approval by those committees prior to formally soliciting public comment. Specifically, the pertinent part of the FDIC's regulations (12 CFR § 345.27(d)) provides:

“ . . . (d) Public participation in plan development. Before submitting a plan to the FDIC for approval, a bank shall:

(1) Informally seek suggestions from members of the public in its assessment area(s) covered by the plan while developing the plan;

(2) Once the bank has developed a plan, formally solicit public comment on the plan for at least 30 days by publishing notice in at least one newspaper of general circulation in each assessment area covered by the plan; and

(3) During the period of formal public comment, make copies of the plan available for review by the public at no cost at all offices of the bank in the assessment area covered by the plan and provide copies of the plan upon request for a reasonable fee to cover copying and mailing, if applicable.

(e) Submission of plan. The bank shall submit its plan to the FDIC at least three months prior to the proposed effective date of the plan. The bank shall also submit with its plan a description of its informal efforts to seek suggestions from members of the public, any written public comment received, and, if the plan was revised in light of the comment received, the initial plan as released for public comment.”

The primary goal of the Bank's Strategic Plan is to be responsive to the credit and development needs of the communities it serves. The Bank is fully committed to complying with the requirements of the CRA and recognizes its obligation to help meet the credit and community development needs within its designated CRA assessment area.

V. ASSESSMENT AREA

FDIC regulations implementing the Act at 12 CFR § 345.41 requires that banks delineate one or more assessment areas in which the FDIC shall evaluate the institution's record of helping to meet community credit needs. A delineated assessment area is to consist

generally of one or more Metropolitan Statistical Areas (MSAs) (using the MSA boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) or one or more contiguous political subdivisions, such as counties, cities, or towns.

In addition, the assessment area is required to include the geographies in which the Bank has its main office, its branches, and its deposit-taking ATMs, as well as the surrounding geographies in which the Bank has originated or purchased a substantial portion of its loans, including home mortgage loans, small business and small farm loans, and any other loans the Bank chooses, such as those consumer loans on which the bank elects to have its performance assessed.

In accordance with 12 CFR § 345.41, Northpointe Bank has delineated a single assessment area consisting of **Kent County, Michigan**. As noted above, as of July 30, 2021, the Bank had approximately \$2.24 billion in total deposits, approximately \$910.1 million were deposits from consumers and small businesses, of which \$374.2 million were from Kent County. Kent County deposits represent 17% of the Bank's total deposits and 41% of consumer and small business deposits. The significant portion of consumer and small business deposits from Kent County, as well as the fact that the Bank's only banking office is located in the county, are the primary reasons for designating Kent County, Michigan as the Bank's only CRA assessment area.

Informal Solicitation of Public Comment on the CRA Strategic Plan

Pursuant to the CRA requirements, the Bank informally sought public input through discussions with local non-profit organizations and through the Bank's involvement with the West Michigan CRA Association. These conversations, along with other independent research, form the basis for the identification of the credit needs in the assessment area, as well as the goals set forth in the remainder of the Plan.

Determining the Credit Needs in Kent County, Michigan

Home purchases have increased during the Covid-19 pandemic, including in Kent County. According to the Grand Rapids Association of Realtors, year-to-date residential sales in Kent County through August 31, 2021 have increased 5.7% to 6,035 units sold from 5,710 units reported for the same time period last year. The year-to-date average home sale price through the end of August 2021 had also increased to \$309,530 from last year's amount of \$265,603, which is a 16.5% increase. The housing market has improved considerably in recent years, accompanied by an increase in values for the area.

According to the Bureau of Labor and Statistics, pre-pandemic, unemployment had decreased slightly from 3.0% to 2.9% from 2018 to 2019 in Kent County, and both numbers were lower than state and national average unemployment. Statewide, unemployment was 4.2% in 2018 and 4.1% in 2019, and nationally was 3.9% in 2018 and 3.7% in 2019. In 2020, however, due to the Covid-19 pandemic, unemployment in the Grand Rapids-Wyoming MSA peaked at 21% in April 2020. It decreased to 5.5% by

January 2021. As of June 2021, unemployment in the MSA was down to 4.8%, compared to 5.3% statewide and 5.9% nationally. While the housing market has been strong, the overall economic conditions are improving more slowly.

Through informal discussions with Habitat for Humanity, United Way of West Michigan, and other non-profit organizations, and through our involvement with the West Michigan CRA Association, which is itself involved in Western Michigan in the Financial Education River City Scholars Charter Academy, Community Action House Volunteer Income Tax Assistance Program, and Junior Achievement, several community needs were identified. In particular, there is a need for affordable housing for LMI families, a corresponding need for continuing financial education of families throughout the community, and a need for additional small business lending. In particular, the supply of affordable housing remains an issue within Kent County, and there is a lot of competition among banks in the area. Additionally, prior to the Covid-19 pandemic, the area had a relatively strong economy, and small business loans are critical for the area to fully recover post-Covid-19. As the Bank does not do small business lending, its focus is on assisting in affordable housing.

VI. PERFORMANCE GOALS AND MEASUREMENT STANDARDS

Under a strategic plan, CRA regulations require the Bank to specify measurable goals for helping to meet the credit needs of the assessment area covered by the Plan, including the needs of LMI geographies and LMI individuals, through lending, investment, and services, as appropriate.

The goals stated in this Strategic Plan have been established based on information obtained through informal discussions with various community organizations and the Bank's own independent research. The Bank also solicited formal public comment on the Plan and its goals, in accordance with the FDIC's CRA regulation.

The CRA regulations also provide that generally a bank shall address in its plan all three performance categories and, unless the bank has been designated as a wholesale or limited purpose bank, shall emphasize lending and lending-related activities. However, the regulation allows the bank to provide a different emphasis, including a focus on one or more performance categories, if it is responsive to the characteristics and credit needs of its assessment area(s), considering public comment and the bank's capacity, constraints, product offerings, and business strategy. Based on the Bank's practical limitations in increasing lending within Kent County as a single branch presence, commensurate with the rate of the Bank's growth, the Bank has bolstered its investment and service activity goals to ensure it is serving the needs of its assessment area communities.

For the term of this Plan, Northpointe Bank has an established measurable performance goal for real estate mortgage lending to LMI borrowers, community development investments, and community development services. The Bank is striving for an overall Satisfactory rating by achieving specific performance in each of these areas. In defining the levels of performance deemed necessary to attain a Satisfactory rating, the Bank has endeavored to carefully consider the identified community development needs of its

assessment areas within the specific framework of the Bank's own unique character and available resources.

Under the FDIC's 12 CFR § 345.12(g), "community development" is defined as:

- (1) Affordable housing (including multifamily 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; or
- (4) Activities that revitalize or stabilize—
 - i. Low- or moderate-income geographies;
 - ii. Designated disaster areas; or
 - iii. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board of Governors of the Federal Reserve System and the Federal Deposit Insurance Corporation, based on—
 - A. Rates of poverty, unemployment, and population loss; or
 - B. Population size, density, and dispersion. Activities 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.

Should this definition be revised in the future, the Bank anticipates that any additional categories of activities may also be incorporated into its strategy to meet the community development goals articulated in this Plan.

As noted above, if there are material changes in the Bank's product mix, geography, or volume projections that would have an impact on the community development goals articulated in the Plan, then the Bank will initiate the process to formally amend the Plan.

Northpointe Bank CRA Goals

The Bank has established goals for lending, investments, and services within its designated CRA assessment area of Kent County, Michigan. Each section has goals for a Satisfactory and an Outstanding CRA rating.

1. Lending Goals

As stated, Northpointe Bank's business model, with its emphasis on internet banking, has historically been limited in the number of mortgages that the Bank originates within its assessment area. In addition, competitors with branch networks, greater brand recognition, more on-the-ground loan officers and a wholesale lending presence tend to capture the majority of the real estate lending market within Kent County, Michigan. However, Northpointe Bank is committed to meeting the lending needs of LMI borrowers within Kent County.

In our 2017-2021 approved CRA Strategic Plan, we had projected our loan originations in Kent County to increase about 10%, akin to our asset growth projections at that time. We fell short of our anticipated CRA performance toward the end of that strategic plan's term, in large part due to unanticipated factors involving the delinquency in monitoring and reporting by the Bank's former CRA Officer, as well as the onset of the global Covid-19 pandemic. We are comfortable that as a larger Bank with CRA performance monitoring in place, and with a path forward for navigating Covid-19 pandemic recovery, we can again resume asset growth and lending commitment levels closer to pre-pandemic levels.

Accordingly, as detailed in Exhibit 5 below, for the Plan's term of the next five years starting January 1, 2022 to December 31, 2026, we are estimating that our overall asset growth rate will be about 10% annually, with the Bank's total assets as of December 31, 2021 at \$4.7 billion. This growth projection assumes that the Bank ends 2026 with approximately \$7.6 billion in total assets. Those projections are as follows:

Exhibit 5: Projected Asset Growth

	2022	2023	2024	2025	2026
Projected EOY Assets (\$M)	\$5,201	\$5,721	\$6,294	\$6,922	\$7,615
% Change	+10%	+10%	+10%	+10%	+10%

Our former 2017-2021 approved CRA Strategic Plan projections for lending levels aligned with our asset growth. However, we believe that tying Kent County lending growth to the same levels of bank growth nationally would create feasibility concerns for our Bank. Accordingly, and based on conversations with the FDIC about bank growth and the anomalies of 2020-2021 pandemic era lending, we are instead basing our lending growth projections in this Plan to historic lending performance in Kent County. This will provide the Bank with quantitative performance goals using actual data, minimizing the difficulty of predicting the Bank's lending capacity for the term of this Plan.

Accordingly, and again based on discussions with the FDIC, our lending growth will be projected to grow in 2022 from the Bank's last year of pre-pandemic lending in Kent County (2019 number of loans, which is 416 loans), increased by a 3% growth rate. The 3% growth rate represents the increase from the Bank's last year of pre-pandemic loans (416 loans) to the average of past 5 years loans (428 loans). Thus, the 2022 loan projection is for 428 loans, and each year thereafter is based on the same 3% growth rate

Northpointe Bank CRA Strategic Plan 2022–2026

rooted in the Bank’s historic performance. Therefore, the projected total loans during the next five years for Northpointe Bank within Kent County totals more than 2,200 loans.

Finally, we are primarily focusing on projecting the aggregate number of loans in Kent County, though still including the dollar value of the loans. This is based on guidance from the FDIC with which we agree that the number of loans is a better indicator of local market demand. For dollar value, and in conjunction with FDIC guidance, we have forecasted the average dollar value of loans based on 2017-2019 average loans sizes for LMI borrowers and in LMI census tracts.

Projected total loans for Northpointe Bank within Kent County are detailed in Exhibit 6.

Exhibit 6: Historic & Projected Loans Purchased/Originated in Kent County

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	Total 2022-2026
#	233	223	416	682	585	428	440	452	465	478	2,264

In preparing the LMI lending goals for the 2022-2026 CRA Strategic Plan, Northpointe Bank is planning to exceed performance from the previous plan period. The historical Bank LMI lending in Kent County from this period is shown below.

Historic LMI Loans Purchased/Originated in Kent County

	2017	2018	2019	2020	2021	Total/Average
Total Loans to LMI Borrowers in Kent County						
#	62	57	107	170	207	603
%	26.6%	25.6%	25.7%	24.9%	35.4%	27.6%
\$(000s)	7,000	7,600	15,000	25,600	30,000	85,200
Total Loans to Low-Income Borrowers in Kent County						
#	20	13	37	45	64	179
%	8.6%	5.8%	8.9%	6.6%	10.9%	8.2%
\$(000s)	1,700	1,300	4,600	5,000	8,000	20,600
Total Loans to Moderate-Income Borrowers in Kent County						
#	42	44	70	125	143	424
%	18.0%	19.7%	16.8%	18.3%	24.4%	19.5%
\$(000s)	5,300	6,300	10,400	20,600	22,000	64,600
Total Loans in LMI Census Tracts in Kent County						
#	42	43	116	109	111	421
%	18%	19.3%	27.9%	16.0%	19.0%	20.0%
\$(000s)	5,100	5,600	16,500	16,800	17,400	61,400
Total Loans in Low-Income Census Tracts in Kent County						
#	8	14	27	23	23	95

Northpointe Bank CRA Strategic Plan 2022–2026

%	3.4%	6.3%	6.5%	3.4%	3.9%	4.7%
\$(000s)	800	1,750	3,300	2,800	2,900	11,550
Total Loans in Moderate-Income Census Tracts in Kent County						
#	34	29	89	86	88	326
%	14.6%	13.0%	21.4%	12.6%	15.0%	15.3%
\$(000s)	4,300	3,800	13,200	14,000	14,500	49,800

As detailed in Exhibit 7 below, the Bank's Kent County LMI lending commitments for the Plan term are set based on percentages of total Kent County lending. Specifically, **for a Satisfactory rating, the Bank commits to originate or purchase 28.0% of its loans to LMI borrowers, and 19.0% of its loans in LMI census tracts** in Kent County over the next five years, starting January 1, 2022.

The goals are based on the averages of recent lending in Kent County, and specifically the Bank's 2017-2021 historic LMI lending rates and HMDA aggregate reporter LMI lending rates. In accordance with discussions with the FDIC, the Bank set its goals for Satisfactory performance to be slightly under the performance of all HMDA aggregate reporters, given the Bank's competitive disadvantage in the Kent County market due to its limited presence.

	Loans to LMI Borrowers	Loans in LMI Census Tracts
2017-2021 Bank Historic Performance	27.6%	20.0%
2016-2020 HMDA Aggregate Reporters	29.4%	19.8%
Bank Satisfactory Goal	28.0%	19.0%

The goals for achieving an Outstanding CRA rating in Exhibit 7 are 20% higher than the Satisfactory goals, at 33.6% loans to LMI borrowers and 22.3% loans in LMI census tracts.

Exhibit 7: Projected CRA Goals for Kent County LMI Loans

	2022	2023	2024	2025	2026	Total
Total Loans in Kent County						
#	428	440	452	465	478	2,264
Total Loans to LMI Borrowers in Kent County for Satisfactory Rating						
#	120	123	127	130	134	634
\$(000s)	15,832	16,223	16,614	17,146	17,678	83,493
%	28.0%	28.0%	28.0%	28.0%	28.0%	28.0%
Total Loans to LMI Borrowers in Kent County for Outstanding Rating						
#	144	148	152	156	161	761

\$(000s)	18,992	19,524	19,915	20,588	21,229	100,248
%	33.6%	33.6%	33.6%	33.6%	33.6%	33.6%
Total Loans in LMI Census Tracts in Kent County for Satisfactory Rating						
#	81	84	86	88	91	430
\$(000s)	11,109	11,389	11,788	12,068	12,348	58,702
%	19.0%	19.0%	19.0%	19.0%	19.0%	19.0%
Total Loans in LMI Census Tracts in Kent County for Outstanding Rating						
#	98	100	103	106	109	516
\$(000s)	13,307	13,587	14,126	14,406	14,826	70,252
%	22.8%	22.8%	22.8%	22.8%	22.8%	22.8%

Projected Low- versus Moderate-Income Borrower Lending Activity

Based on the CRA loan goals detailed above in Exhibit 7, we have projected the lending for both categories of LMI households within Kent County. Exhibit 8 details the projected lending activity. In accordance with discussions with the FDIC, the Bank set its goals for Satisfactory performance to be slightly under the performance of all HMDA aggregate reporters, given the Bank's competitive disadvantage in the Kent County market due to its limited presence.

	Loans to Low-Income Borrowers	Loans to Moderate-Income Borrowers
2017-2021 Bank Historic Performance	8.17%	19.47%
2016-2020 HMDA Aggregate Reporters	8.20%	21.22%
Bank Satisfactory Goal	8.0%	20.0%

To achieve a **Satisfactory rating**, the Bank commits to originate or purchase **8.0% of its total Kent County loans over the next five years for low-income households**. The Bank has forecasted its loan dollar volume as \$109,000 per projected loan, based on an average of its 2017-2019 low-income borrower loan dollar values, in accordance with FDIC guidance. For an Outstanding rating, the Bank is committed to originate or purchase 9.6% of its total Kent County loans for low-income households, which is a 20% increase over the Satisfactory level.

To achieve a **Satisfactory rating**, the Bank commits to originate or purchase **20.0% of its total Kent County loans over the next five years for moderate-income households**. The Bank has forecasted its loan dollar volume as \$141,000 per projected loan, based on an average of its 2017-2019 moderate-income borrower loan dollar values,

in accordance with FDIC guidance. For an Outstanding rating, the Bank is committed to originate or purchase 24.0% of its total Kent County loans for moderate-income households, which is a 20% increase over the Satisfactory level.

Exhibit 8: Projected LMI lending by Borrower Income Level

	2022	2023	2024	2025	2026	Total
Satisfactory Rating						
Loans to Low-Income Borrowers						
#	34	35	36	37	38	180
\$(000s)	3,706	3,815	3,924	4,033	4,142	19,620
%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%
Loans to Moderate-Income Borrowers						
#	86	88	90	93	96	453
\$(000s)	12,126	12,408	12,690	13,113	13,536	63,873
%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
Outstanding Rating						
Loans to Low-Income Borrowers						
#	41	42	43	44	46	216
\$(000s)	4,469	4,578	4,687	4,796	5,014	23,544
%	9.6%	9.6%	9.6%	9.6%	9.6%	9.6%
Loans to Moderate-Income Borrowers						
#	103	106	108	112	115	544
\$(000s)	14,523	14,946	15,228	15,792	16,215	76,704
%	24.0%	24.0%	24.0%	24.0%	24.0%	24.0%

Projected LMI Lending by Census Tracts

Based on the CRA Loan goals detailed above in Exhibit 7, we have projected the lending in both categories of LMI census tracts within Kent County. Exhibit 9 details the projected lending activity. In accordance with discussions with the FDIC, the Bank set its goals for Satisfactory performance to be slightly under the performance of all HMDA aggregate reporters, given the Bank's competitive disadvantage in the Kent County market due to its limited presence.

	Loans in Low-Census Tracts	Loans in Moderate-Income Census Tracts
2017-2021 Bank Historic Performance	4.70%	15.33%
2016-2020 HMDA Aggregate Reporters	2.97%	16.82%

Bank Satisfactory Goal	2.6%	16.4%
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To achieve a **Satisfactory rating**, the Bank commits to originate or purchase **2.6% of its total Kent County loans over the next five years in low-income census tracts**. The Bank has forecasted its loan dollar volume as \$119,000 per projected loan, based on an average of its 2017-2019 low-income census tract loan dollar values, in accordance with FDIC guidance. For an Outstanding rating, the Bank is committed to originate or purchase 3.1% of its total Kent County loans in low-income census tracts, which is a 20% increase over the Satisfactory level.

To achieve a **Satisfactory rating**, the Bank commits to originate or purchase **16.4% of its total Kent County loans over the next five years in moderate-income census tracts**. The Bank has forecasted its loan dollar volume as \$140,000 per projected loan, based on an average of its 2017-2019 moderate-income census tract loan dollar values, in accordance with FDIC guidance. For an Outstanding rating, the Bank is committed to originate or purchase 19.7% of its total Kent County loans in moderate-income census tracts, which is a 20% increase over the Satisfactory level.

Exhibit 9: Projected LMI lending by Census Tract Income Level

	2022	2023	2024	2025	2026	Total
Satisfactory Rating						
Loans in Low-Income Census Tracts						
#	11	11	12	12	12	58
\$(000s)	1,309	1,309	1,428	1,428	1,428	6,902
%	2.6%	2.6%	2.6%	2.6%	2.6%	2.6%
Loans in Moderate-Income Census Tracts						
#	70	72	74	76	78	370
\$(000s)	9,800	10,080	10,360	10,640	10,920	51,800
%	16.4%	16.4%	16.4%	16.4%	16.4%	16.4%
Outstanding Rating						
Loans in Low-Income Census Tracts						
#	13	13	14	14	14	68
\$(000s)	1,547	1,547	1,666	1,666	1,666	8,092
%	3.1%	3.1%	3.1%	3.1%	3.1%	3.1%
Loans in Moderate-Income Census Tracts						
#	84	86	89	91	94	444
\$(000s)	11,760	12,040	12,460	12,740	13,160	62,160
%	19.7%	19.7%	19.7%	19.7%	19.7%	19.7%

2. Qualified Investments

Northpointe Bank commits to invest at least 0.26% annually of each prior year’s end of year (EOY) assets in qualified investments in its assessment area and broader statewide or regional area over the term of the Plan, as projected in Exhibits 10 and 11. Because the Bank has grown significantly since the last evaluation, and because opportunities within the Kent County assessment area may be limited, the Bank plans to fulfill its qualified investment commitment in both Kent County and the broader statewide or regional area.

The annual Satisfactory rating goals of **0.26% of prior year EOY assets** (projected at Exhibit 5) are the same as in the prior approved strategic plan and is also in line with the performance of peer banks.

The annual Outstanding rating goals are **0.31% of prior year EOY assets**, based on an increase of 20% over the Satisfactory rating goals of 0.26% of EOY assets.

Exhibit 10: Projected CRA Qualified Investment Goals

	2021	2022	2023	2024	2025	2026	Total
Projected EOY Assets (\$000s)	4,728,459	5,201,305	5,721,435	6,293,579	6,922,937		
	Satisfactory						
Percentage of EOY Assets		0.26%	0.26%	0.26%	0.26%	0.26%	
Resulting Annual Qualified Investments (\$000s)		12,294	13,523	14,876	16,363	18,000	75,056
	Outstanding						
Percentage of EOY Assets		0.31%	0.31%	0.31%	0.31%	0.31%	
Resulting Annual Qualified Investments (\$000s)		14,658	16,124	17,736	19,510	21,461	89,490

In addition, the Bank will commit to donate \$100,000 each year to qualified organizations, or a total of \$500,000 over the next five years. This donation level is significantly higher than the last approved strategic plan and is driven by the Bank’s significant asset growth since that plan was developed in 2016, and in line with peer banking institution donation levels.

To achieve an Outstanding CRA rating, the Bank will commit to donate \$120,000 each year to qualified organizations, for a total of \$600,000 over the next five years, as detailed in Exhibit 11.

Exhibit 11: Projected Goals for Investments & Donations

	2022	2023	2024	2025	2026	Total
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Satisfactory						
Projected Investments (\$000s)	12,194	13,423	14,776	16,263	17,900	74,556
Donations (\$000s)	100	100	100	100	100	500
Total Projected Qualified Investments (\$000s)	12,294	13,523	14,876	16,363	18,000	75,056
Outstanding						
Projected Investments (\$000s)	14,538	16,004	17,616	19,390	21,341	88,890
Donations (\$000s)	120	120	120	120	120	600
Total Projected Qualified Investments (\$000s)	14,658	16,124	17,736	19,510	21,461	89,490

Furthermore, and to address the FDIC’s recent observation concerning the longevity of the Bank’s historic investment projects, the Bank commits that its qualified investments during the term of the Plan will remain on the Bank’s balance sheet for at least one year. The Bank is always looking to provide material and lasting impact to its communities and seeks to be responsive to community needs, and thus will look specifically for long-term investments.

We are looking to continue to invest the funds listed in Exhibits 10 and 11 with a majority invested in deposits at Community Development Financial Institutions (“CDFIs”) within our Michigan communities. In addition, throughout the 2022-2026 Strategic Plan term, we will continue to look for other qualified investments that will meet the needs of this Strategic Plan.

3. Services

The Bank supports the volunteer services of its employees to various community-based groups that are involved in economic development or other qualifying community revitalization efforts. Such services include, but are not limited to, serving on the boards of various non-profit and community development organizations, and sponsoring and/or participating in financial education opportunities as they arise.

The total number of current employees of the Bank is 1,150, while the number of employees located within the main office of Grand Rapids, Michigan and within the CRA assessment area is 353. It is the expectation of all Bank employees that they be involved within their communities. Employees can easily report their community service, including the organization, type of activity, and time spent in hours, which is then compiled and used to track the total number of community service hours performed. Community services are defined either as qualified or non-qualified CRA activity. CRA qualified activity is defined as that which is financial in nature and involves lending, education, or other services that benefit LMI individuals, families, or small business activity within the Bank’s defined CRA assessment area. Examples of CRA qualified services performed by employees include volunteering to providing financial education to LMI students through the Junior Achievement program in the local schools, as well as employee

involvement with a local organization, Seeds of Promise, which provides subsidies to help existing low-income families with improving their homes and creates employment, mentoring and training opportunities in Grand Rapids, Michigan. Community service is important. Although our employees are involved in “qualified” CRA activity, they are also involved in non-qualified activities in our community, which are just as important.

In our two previous CRA strategic plans, the Bank had committed to provide an average of about 1.2 to 2.8 hours of community development services per Kent County employee per year. While the Bank met its 2013-2016 plan goals of 1.2 to 1.4 hours per employee, it fell short of its 2017-2021 plan goals of providing 2.3-2.8 service hours per employee. Accordingly, the 2022-2026 Strategic Plan commits the Bank to providing hour targets in between the past goals. In total, however, this Plan will provide significantly more service hours to the community than in years past, as the Bank has grown since those times.

For a Satisfactory CRA rating, the Bank commits to provide at least 1.5 community development service hours per year for each employee within the Kent County assessment area. Each year’s specific hour goal will be determined based on the actual number of employees at the prior year end. For illustration purposes, Exhibit 12 assumes an annual Northpointe employee growth of 5%, which would culminate in just over 3,000 hours over the course of the Plan.

To achieve an Outstanding CRA rating, the Bank commits to provide at least 1.8 community development service hours per year for each employee within the Kent County assessment area. This is a 20% increase over the Satisfactory goal of 1.5 hours per employee. Again, each year’s specific hour goal will be determined based on the actual number of employees at the prior year end. For illustration purposes, Exhibit 12 assumes an annual Northpointe employee growth of 5%, which would culminate in more than 3,600 hours over the course of the Plan.

Exhibit 12: Projected Goals of Qualified Community Development Service Hours within Kent County

	2022	2023	2024	2025	2026	Total
Estimated Number of Employees at Prior Year End	371	389	409	429	451	
Average Hours per Employee for a Satisfactory Rating	1.5	1.5	1.5	1.5	1.5	
Resulting # Hours for a Satisfactory Rating	556.0	583.8	613.0	643.6	675.8	3,072.1
Average Hours per Employee for an Outstanding Rating	1.8	1.8	1.8	1.8	1.8	
Resulting # Hours for an Outstanding Rating	667.2	700.5	735.6	772.3	810.9	3,686.5

VII. ELECTION OF ALTERNATIVE CRA ASSESSMENT METHOD

Northpointe Bank's Board of Directors and management are committed to the goals set forth in this Plan. Pursuant to 12 CFR § 345.27(f)(4), if through unforeseen circumstances, Northpointe Bank is unable to meet substantially all of the goals enumerated in this Plan to achieve a Satisfactory rating, the Bank's CRA performance should be assessed under the appropriate standards for our asset size.

As noted above in section III of the Plan, and pursuant to 12 CFR § 345.27(h), if there is a material change in the Bank's circumstances during the term of the Plan (including but not limited to a merger, acquisition, branch expansion, or branch closing), the Bank will develop an amendment to the Plan in consultation with the FDIC.

VIII. APPENDIX

APPENDIX A

**APPENDIX A: NOTICE OF PROPOSED COMMUNITY REINVESTMENT ACT
STRATEGIC PLAN**

Notice Regarding Public Inspection of Proposed CRA Strategic Plan

This public notice was published in the following newspapers of general circulation within the Bank's current and proposed assessment areas:

The Grand Rapids Press: October 2, 2021

**Northpointe Bank
Community Reinvestment Act (CRA) Strategic Plan**

The CRA regulations require a bank that has developed a Strategic Plan to publish notice of the plan and solicit formal written public comment for at least a 30-day period. In conformance with this requirement, Northpointe Bank (the "Bank") hereby provides notice to the public of its plan to submit a five (5) year CRA Strategic Plan to the Federal Deposit Insurance Corporation (FDIC).

Written comments from the public concerning the Strategic Plan are encouraged. To obtain a copy of the Bank's Strategic Plan at no charge to the requesting party, individuals in Michigan may request a copy by writing to CRA Officer, 3333 Deposit Drive NE, Grand Rapids, MI 49546 or emailing craofficer@northpointe.com.

All written comments regarding the plan should be directed to the CRA Officer at the address or email listed above. Comments and suggestions will be accepted until October 31, 2021, following which time the plan will be submitted for approval to the Federal Deposit Insurance Corporation (FDIC). Northpointe Bank will review all comments and incorporate suggestions to the plan at its discretion.

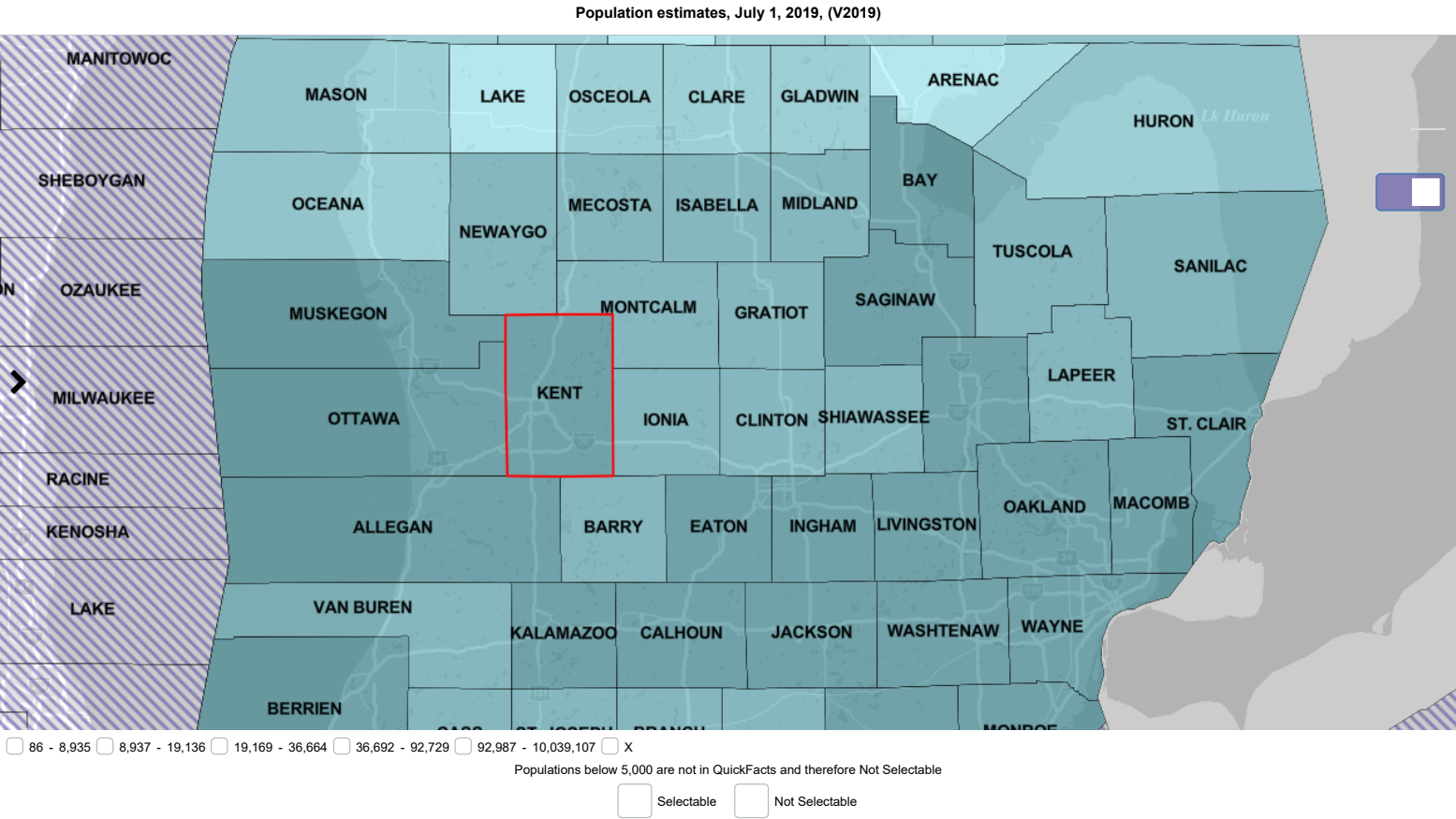
APPENDIX B

QuickFacts
Kent County, Michigan; Michigan

QuickFacts provides statistics for all states and counties, and for cities and towns with a *population of 5,000 or more*.

Map

TIGERweb



Value Notes

1. Includes data not distributed by county.

Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info icon to the left of each

row in TABLE view to learn about sampling error.

The vintage year (e.g., V2019) refers to the final year of the series (2010 thru 2019). *Different vintage years of estimates are not comparable.*

Fact Notes

- (a) Includes persons reporting only one race
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data
- (b) Hispanics may be of any race, so also are included in applicable race categories

Value Flags

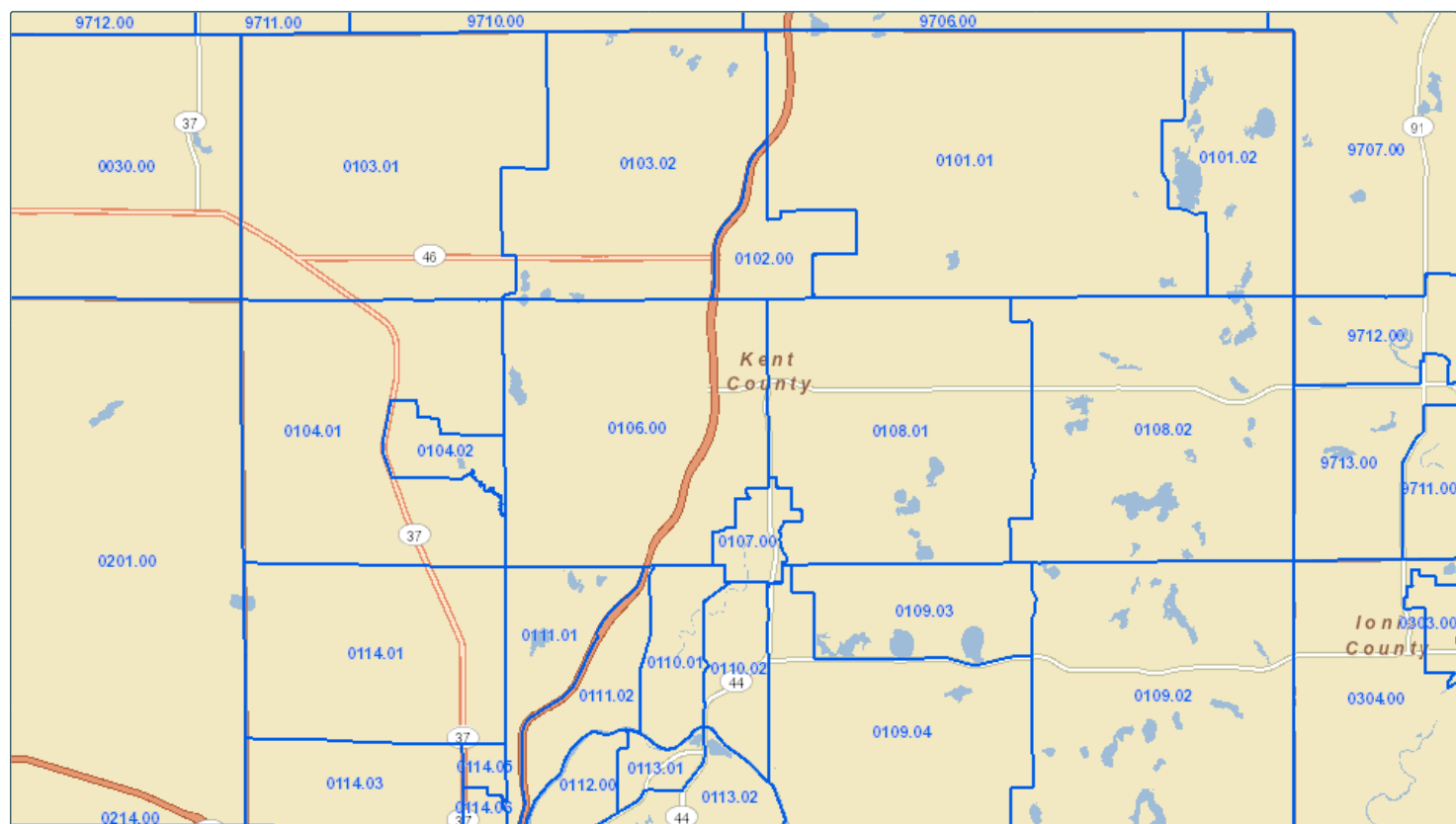
- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper interval of an open ended distribution.
- F Fewer than 25 firms
- D Suppressed to avoid disclosure of confidential information
- N Data for this geographic area cannot be displayed because the number of sample cases is too small.
- FN Footnote on this item in place of data
- X Not applicable
- S Suppressed; does not meet publication standards
- NA Not available
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

CONNECT WITH US

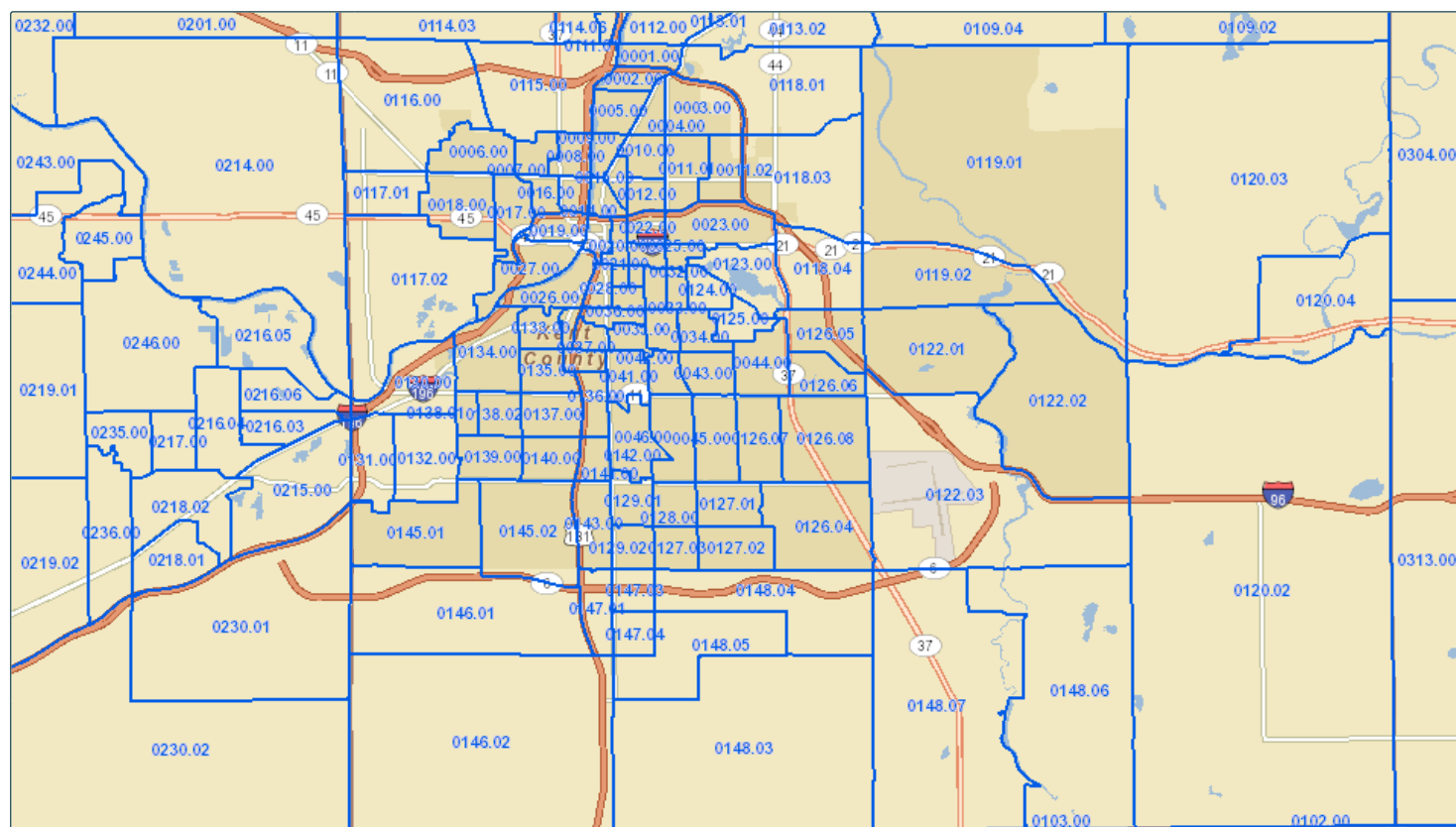


[Accessibility](#) | [Information Quality](#) | [FOIA](#) | [Data Protection and Privacy Policy](#) | [U.S. Department of Commerce](#)



● Matched Address:
MSA: || State: || County: || Tract Code:

Selected Tract
MSA: || State: || County: || Tract Code:

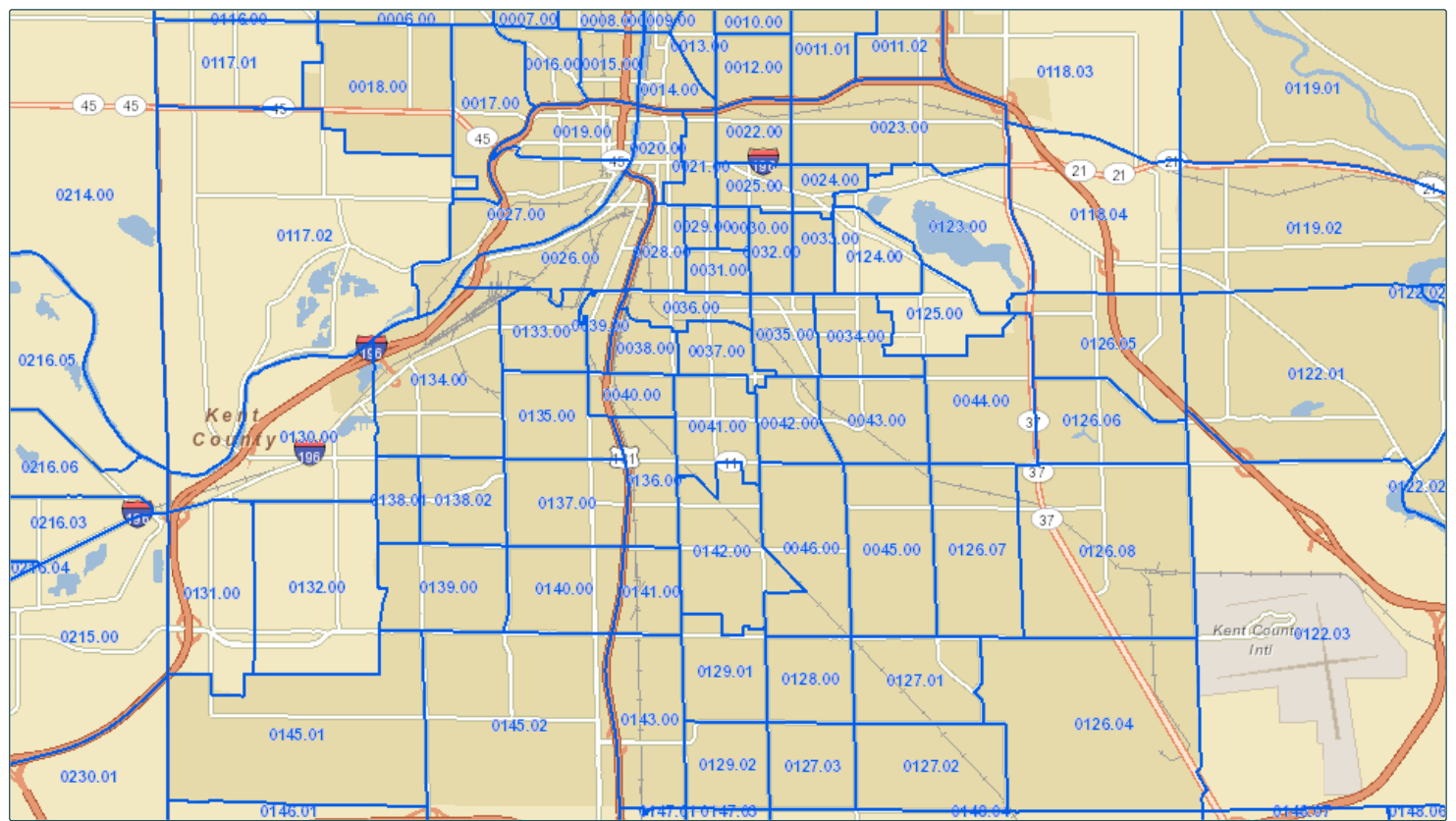


● Matched Address:
MSA: || State: || County: || Tract Code:

Selected Tract
MSA: || State: || County: || Tract Code:



FFIEC Geocoding/Mapping System -- 2021



● Matched Address:
MSA: || State: || County: || Tract Code:

● Selected Tract
MSA: || State: || County: || Tract Code:

2021 FFIEC Census Report - Summary Census Income Information

State: 26 - MICHIGAN (MI)

County: 081 - KENT COUNTY

Tract: All Tracts



State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
26	081	0001.00	Moderate	\$64,496	\$76,600	11.64	79.94	\$51,563	\$61,234	\$44,031
26	081	0002.00	Middle	\$64,496	\$76,600	4.32	101.62	\$65,547	\$77,841	\$54,318
26	081	0003.00	Middle	\$64,496	\$76,600	6.19	107.70	\$69,464	\$82,498	\$52,191
26	081	0004.00	Middle	\$64,496	\$76,600	11.13	95.53	\$61,616	\$73,176	\$51,389
26	081	0005.00	Middle	\$64,496	\$76,600	10.71	92.16	\$59,440	\$70,595	\$54,434
26	081	0006.00	Middle	\$64,496	\$76,600	6.11	106.93	\$68,967	\$81,908	\$50,972
26	081	0007.00	Middle	\$64,496	\$76,600	12.48	82.87	\$53,450	\$63,478	\$45,919
26	081	0008.00	Low	\$64,496	\$76,600	40.10	43.83	\$28,275	\$33,574	\$27,723
26	081	0009.00	Moderate	\$64,496	\$76,600	38.08	52.65	\$33,958	\$40,330	\$32,535
26	081	0010.00	Middle	\$64,496	\$76,600	25.17	80.27	\$51,774	\$61,487	\$40,258
26	081	0011.01	Moderate	\$64,496	\$76,600	18.50	65.58	\$42,298	\$50,234	\$38,667
26	081	0011.02	Moderate	\$64,496	\$76,600	26.91	61.70	\$39,795	\$47,262	\$33,481
26	081	0012.00	Moderate	\$64,496	\$76,600	19.84	73.45	\$47,375	\$56,263	\$39,811
26	081	0013.00	Low	\$64,496	\$76,600	44.80	33.21	\$21,422	\$25,439	\$25,293
26	081	0014.00	Moderate	\$64,496	\$76,600	39.23	70.54	\$45,500	\$54,034	\$39,643
26	081	0015.00	Low	\$64,496	\$76,600	46.47	37.56	\$24,231	\$28,771	\$24,712
26	081	0016.00	Moderate	\$64,496	\$76,600	27.46	51.35	\$33,125	\$39,334	\$30,750
26	081	0017.00	Middle	\$64,496	\$76,600	12.64	108.03	\$69,679	\$82,751	\$52,934
26	081	0018.00	Middle	\$64,496	\$76,600	13.62	104.71	\$67,538	\$80,208	\$48,278
26	081	0019.00	Moderate	\$64,496	\$76,600	25.40	75.67	\$48,808	\$57,963	\$39,844
26	081	0020.00	Upper	\$64,496	\$76,600	44.09	164.21	\$105,909	\$125,785	\$17,981
26	081	0021.00	Middle	\$64,496	\$76,600	34.35	103.18	\$66,553	\$79,036	\$23,675
26	081	0022.00	Moderate	\$64,496	\$76,600	25.27	78.34	\$50,532	\$60,008	\$45,059
26	081	0023.00	Middle	\$64,496	\$76,600	14.03	113.86	\$73,438	\$87,217	\$58,600
26	081	0024.00	Upper	\$64,496	\$76,600	27.69	141.66	\$91,369	\$108,512	\$62,150
26	081	0025.00	Middle	\$64,496	\$76,600	30.17	86.41	\$55,735	\$66,190	\$42,128
26	081	0026.00	Low	\$64,496	\$76,600	56.79	34.35	\$22,159	\$26,312	\$23,659
26	081	0027.00	Moderate	\$64,496	\$76,600	35.89	66.47	\$42,875	\$50,916	\$32,763
26	081	0028.00	Low	\$64,496	\$76,600	55.58	32.03	\$20,660	\$24,535	\$16,786
26	081	0029.00	Middle	\$64,496	\$76,600	27.06	94.83	\$61,167	\$72,640	\$47,202
26	081	0030.00	Moderate	\$64,496	\$76,600	26.44	66.33	\$42,784	\$50,809	\$41,450
26	081	0031.00	Low	\$64,496	\$76,600	31.41	45.82	\$29,557	\$35,098	\$25,795
26	081	0032.00	Low	\$64,496	\$76,600	53.75	40.23	\$25,950	\$30,816	\$22,366
26	081	0033.00	Middle	\$64,496	\$76,600	18.21	103.90	\$67,014	\$79,587	\$55,179
26	081	0034.00	Middle	\$64,496	\$76,600	8.85	106.59	\$68,750	\$81,648	\$60,000
26	081	0035.00	Moderate	\$64,496	\$76,600	30.43	56.46	\$36,417	\$43,248	\$33,191
26	081	0036.00	Low	\$64,496	\$76,600	48.17	34.44	\$22,216	\$26,381	\$21,364
26	081	0037.00	Moderate	\$64,496	\$76,600	39.02	59.35	\$38,284	\$45,462	\$30,559
26	081	0038.00	Low	\$64,496	\$76,600	54.04	40.68	\$26,238	\$31,161	\$28,590
26	081	0039.00	Low	\$64,496	\$76,600	48.31	42.29	\$27,279	\$32,394	\$30,585
26	081	0040.00	Low	\$64,496	\$76,600	35.86	49.87	\$32,168	\$38,200	\$32,289

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
26	081	0041.00	Middle	\$64,496	\$76,600	19.45	97.63	\$62,969	\$74,785	\$50,460
26	081	0042.00	Middle	\$64,496	\$76,600	12.91	102.04	\$65,817	\$78,163	\$53,221
26	081	0043.00	Upper	\$64,496	\$76,600	11.68	127.10	\$81,976	\$97,359	\$55,625
26	081	0044.00	Upper	\$64,496	\$76,600	9.93	136.92	\$88,310	\$104,881	\$68,735
26	081	0045.00	Middle	\$64,496	\$76,600	18.54	86.35	\$55,698	\$66,144	\$48,173
26	081	0046.00	Middle	\$64,496	\$76,600	14.81	84.93	\$54,777	\$65,056	\$41,686
26	081	0101.01	Middle	\$64,496	\$76,600	10.85	105.45	\$68,013	\$80,775	\$60,565
26	081	0101.02	Middle	\$64,496	\$76,600	11.78	101.90	\$65,726	\$78,055	\$55,625
26	081	0102.00	Moderate	\$64,496	\$76,600	24.05	76.58	\$49,395	\$58,660	\$41,692
26	081	0103.01	Middle	\$64,496	\$76,600	14.76	82.38	\$53,138	\$63,103	\$47,233
26	081	0103.02	Middle	\$64,496	\$76,600	8.63	101.07	\$65,188	\$77,420	\$59,429
26	081	0104.01	Middle	\$64,496	\$76,600	17.21	93.25	\$60,148	\$71,430	\$51,531
26	081	0104.02	Moderate	\$64,496	\$76,600	12.92	78.46	\$50,607	\$60,100	\$40,807
26	081	0106.00	Upper	\$64,496	\$76,600	10.77	127.03	\$81,935	\$97,305	\$76,782
26	081	0107.00	Upper	\$64,496	\$76,600	11.96	122.24	\$78,844	\$93,636	\$50,104
26	081	0108.01	Upper	\$64,496	\$76,600	5.29	125.14	\$80,714	\$95,857	\$77,940
26	081	0108.02	Middle	\$64,496	\$76,600	7.42	104.52	\$67,417	\$80,062	\$67,854
26	081	0109.02	Upper	\$64,496	\$76,600	5.92	124.35	\$80,202	\$95,252	\$67,500
26	081	0109.03	Upper	\$64,496	\$76,600	1.70	163.95	\$105,743	\$125,586	\$93,699
26	081	0109.04	Upper	\$64,496	\$76,600	9.02	139.02	\$89,667	\$106,489	\$81,004
26	081	0110.01	Upper	\$64,496	\$76,600	2.58	129.62	\$83,602	\$99,289	\$79,444
26	081	0110.02	Middle	\$64,496	\$76,600	5.34	113.24	\$73,036	\$86,742	\$58,854
26	081	0111.01	Middle	\$64,496	\$76,600	5.64	102.47	\$66,094	\$78,492	\$54,803
26	081	0111.02	Upper	\$64,496	\$76,600	3.88	131.08	\$84,543	\$100,407	\$73,194
26	081	0112.00	Middle	\$64,496	\$76,600	11.88	106.34	\$68,590	\$81,456	\$43,821
26	081	0113.01	Middle	\$64,496	\$76,600	10.67	108.89	\$70,234	\$83,410	\$61,968
26	081	0113.02	Middle	\$64,496	\$76,600	9.76	102.71	\$66,250	\$78,676	\$52,557
26	081	0114.01	Middle	\$64,496	\$76,600	6.60	114.21	\$73,661	\$87,485	\$58,333
26	081	0114.03	Middle	\$64,496	\$76,600	10.82	98.73	\$63,682	\$75,627	\$54,375
26	081	0114.05	Middle	\$64,496	\$76,600	9.00	101.70	\$65,594	\$77,902	\$55,337
26	081	0114.06	Moderate	\$64,496	\$76,600	37.98	50.11	\$32,320	\$38,384	\$33,697
26	081	0115.00	Moderate	\$64,496	\$76,600	16.62	76.59	\$49,399	\$58,668	\$44,762
26	081	0116.00	Middle	\$64,496	\$76,600	9.82	115.72	\$74,638	\$88,642	\$65,696
26	081	0117.01	Middle	\$64,496	\$76,600	11.23	107.65	\$69,432	\$82,460	\$60,338
26	081	0117.02	Middle	\$64,496	\$76,600	17.20	103.65	\$66,852	\$79,396	\$41,913
26	081	0118.01	Upper	\$64,496	\$76,600	6.01	142.72	\$92,050	\$109,324	\$80,452
26	081	0118.03	Upper	\$64,496	\$76,600	8.16	190.32	\$122,750	\$145,785	\$86,935
26	081	0118.04	Upper	\$64,496	\$76,600	4.04	149.66	\$96,528	\$114,640	\$77,552
26	081	0119.01	Upper	\$64,496	\$76,600	2.07	199.21	\$128,486	\$152,595	\$125,270
26	081	0119.02	Upper	\$64,496	\$76,600	2.56	191.01	\$123,194	\$146,314	\$118,772
26	081	0120.02	Upper	\$64,496	\$76,600	9.85	129.27	\$83,380	\$99,021	\$70,718
26	081	0120.03	Upper	\$64,496	\$76,600	12.43	124.96	\$80,597	\$95,719	\$68,576
26	081	0120.04	Middle	\$64,496	\$76,600	8.97	95.83	\$61,809	\$73,406	\$59,155
26	081	0122.01	Upper	\$64,496	\$76,600	1.56	184.58	\$119,049	\$141,388	\$103,542
26	081	0122.02	Upper	\$64,496	\$76,600	0.85	196.77	\$126,912	\$150,726	\$120,111

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
26	081	0122.03	Upper	\$64,496	\$76,600	4.54	169.96	\$109,618	\$130,189	\$91,743
26	081	0123.00	Upper	\$64,496	\$76,600	3.33	195.01	\$125,774	\$149,378	\$108,466
26	081	0124.00	Upper	\$64,496	\$76,600	4.15	179.22	\$115,595	\$137,283	\$111,287
26	081	0125.00	Upper	\$64,496	\$76,600	1.48	187.99	\$121,250	\$144,000	\$114,145
26	081	0126.04	Upper	\$64,496	\$76,600	7.72	136.14	\$87,805	\$104,283	\$76,381
26	081	0126.05	Upper	\$64,496	\$76,600	14.76	159.89	\$103,125	\$122,476	\$86,964
26	081	0126.06	Moderate	\$64,496	\$76,600	25.95	51.25	\$33,057	\$39,258	\$32,654
26	081	0126.07	Moderate	\$64,496	\$76,600	18.63	61.69	\$39,792	\$47,255	\$30,632
26	081	0126.08	Middle	\$64,496	\$76,600	9.68	94.76	\$61,118	\$72,586	\$46,053
26	081	0127.01	Moderate	\$64,496	\$76,600	18.60	76.23	\$49,167	\$58,392	\$38,563
26	081	0127.02	Middle	\$64,496	\$76,600	4.45	118.97	\$76,736	\$91,131	\$70,705
26	081	0127.03	Middle	\$64,496	\$76,600	14.55	85.95	\$55,439	\$65,838	\$56,111
26	081	0128.00	Middle	\$64,496	\$76,600	7.38	98.62	\$63,611	\$75,543	\$57,159
26	081	0129.01	Moderate	\$64,496	\$76,600	34.65	50.87	\$32,813	\$38,966	\$33,720
26	081	0129.02	Middle	\$64,496	\$76,600	14.63	83.52	\$53,869	\$63,976	\$42,130
26	081	0130.00	Middle	\$64,496	\$76,600	10.25	92.14	\$59,432	\$70,579	\$47,500
26	081	0131.00	Middle	\$64,496	\$76,600	9.97	101.44	\$65,429	\$77,703	\$45,974
26	081	0132.00	Upper	\$64,496	\$76,600	5.38	140.03	\$90,317	\$107,263	\$60,380
26	081	0133.00	Moderate	\$64,496	\$76,600	26.66	59.43	\$38,333	\$45,523	\$39,349
26	081	0134.00	Middle	\$64,496	\$76,600	12.08	91.22	\$58,834	\$69,875	\$54,926
26	081	0135.00	Moderate	\$64,496	\$76,600	25.37	57.46	\$37,060	\$44,014	\$32,232
26	081	0136.00	Moderate	\$64,496	\$76,600	19.41	67.20	\$43,346	\$51,475	\$42,868
26	081	0137.00	Moderate	\$64,496	\$76,600	15.36	66.79	\$43,083	\$51,161	\$41,717
26	081	0138.01	Moderate	\$64,496	\$76,600	15.26	67.15	\$43,314	\$51,437	\$38,966
26	081	0138.02	Moderate	\$64,496	\$76,600	21.59	59.74	\$38,533	\$45,761	\$35,130
26	081	0139.00	Middle	\$64,496	\$76,600	13.42	90.27	\$58,226	\$69,147	\$47,574
26	081	0140.00	Middle	\$64,496	\$76,600	12.55	83.86	\$54,091	\$64,237	\$43,505
26	081	0141.00	Middle	\$64,496	\$76,600	8.74	83.76	\$54,028	\$64,160	\$44,709
26	081	0142.00	Moderate	\$64,496	\$76,600	15.08	77.52	\$50,000	\$59,380	\$44,599
26	081	0143.00	Moderate	\$64,496	\$76,600	17.24	77.82	\$50,195	\$59,610	\$44,953
26	081	0145.01	Middle	\$64,496	\$76,600	8.67	118.75	\$76,595	\$90,963	\$62,180
26	081	0145.02	Upper	\$64,496	\$76,600	8.02	121.82	\$78,575	\$93,314	\$67,854
26	081	0146.01	Middle	\$64,496	\$76,600	1.11	117.90	\$76,043	\$90,311	\$66,607
26	081	0146.02	Middle	\$64,496	\$76,600	7.07	118.45	\$76,399	\$90,733	\$66,555
26	081	0147.01	Moderate	\$64,496	\$76,600	28.07	62.75	\$40,474	\$48,067	\$36,042
26	081	0147.03	Moderate	\$64,496	\$76,600	20.67	57.95	\$37,380	\$44,390	\$35,657
26	081	0147.04	Middle	\$64,496	\$76,600	16.04	104.47	\$67,381	\$80,024	\$63,266
26	081	0148.03	Middle	\$64,496	\$76,600	1.53	119.36	\$76,985	\$91,430	\$71,897
26	081	0148.04	Middle	\$64,496	\$76,600	16.77	90.99	\$58,689	\$69,698	\$48,524
26	081	0148.05	Upper	\$64,496	\$76,600	3.29	129.99	\$83,839	\$99,572	\$82,405
26	081	0148.06	Upper	\$64,496	\$76,600	5.84	141.48	\$91,250	\$108,374	\$85,452
26	081	0148.07	Upper	\$64,496	\$76,600	5.28	135.03	\$87,095	\$103,433	\$80,105

APPENDIX C

Schedule RC-C Part I - Loans and Leases(Form Type - 041)

Do not deduct the allowance for loan and lease losses or the allocated transfer risk reserve from amounts reported in this schedule. Report (1) loans and leases held for sale at the lower of cost or fair value, (2) loans and leases held for investment, net of unearned income, and (3) loans and leases accounted for at fair value under a fair value option. Exclude assets held for trading and commercial paper.

Dollar amounts in thousands		(Column A) To Be Completed by Banks with \$300 Million or More in Total Assets	(Column B) To Be Completed by All Banks	
1. Loans secured by real estate:				1.
a. Construction, land development, and other land loans:				1.a.
1. 1-4 family residential construction loans.....		RCONF158	72,485	1.a.1.
2. Other construction loans and all land development and other land loans.....		RCONF159	90,298	1.a.2.
b. Secured by farmland (including farm residential and other improvements).....		RCON1420	203	1.b.
c. Secured by 1-4 family residential properties:				1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....		RCON1797	84,266	1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:				1.c.2.
a. Secured by first liens.....		RCON5367	1,730,916	1.c.2.a.
b. Secured by junior liens.....		RCON5368	111,490	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties.....		RCON1460	421	1.d.
e. Secured by nonfarm nonresidential properties:				1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....		RCONF160	4,181	1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....		RCONF161	128	1.e.2.
2. Loans to depository institutions and acceptances of other banks.....		RCON1288	NR	2.
a. To commercial banks in the U.S.....	RCONB531	0		2.a.
b. To other depository institutions in the U.S.....	RCONB534	0		2.b.
c. To banks in foreign countries.....	RCONB535	0		2.c.
3. Loans to finance agricultural production and other loans to farmers.....		RCON1590	0	3.
4. Commercial and industrial loans.....		RCON1766	7,249	4.
a. To U.S. addressees (domicile).....	RCON1763	7,249		4.a.
b. To non-U.S. addressees (domicile).....	RCON1764	0		4.b.
5. Not applicable				5.
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):				6.
a. Credit cards.....		RCONB538	0	6.a.
b. Other revolving credit plans.....		RCONB539	549	6.b.
c. Automobile loans.....		RCONK137	0	6.c.
d. Other consumer loans (includes single payment and installment loans other than automobile loans and all student loans).....		RCONK207	0	6.d.
7. Not applicable				7.
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.....		RCON2107	0	8.
9. Loans to nondepository financial institutions and other loans:				9.
a. Loans to nondepository financial institutions.....		RCONJ454	606,176	9.a.
b. Other loans.....		RCONJ464	7,136	9.b.
1. Loans for purchasing or carrying securities (secured and unsecured).....	RCON1545	0		9.b.1.
2. All other loans (exclude consumer loans).....	RCONJ451	7,136		9.b.2.
10. Lease financing receivables (net of unearned income).....		RCON2165	0	10.
a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases).....	RCONF162	0		10.a.
b. All other leases.....	RCONF163	0		10.b.
11. LESS: Any unearned income on loans reflected in items 1-9 above.....		RCON2123	0	11.
12. Total loans and leases held for investment and held for sale (sum of items 1 through 10 minus item 11) (must equal Schedule RC, sum of items 4.a and 4.b).....		RCON2122	2,715,498	12.

Dollar amounts in thousands

1. Loans restructured in troubled debt restructurings that are in compliance with their modified terms (included in Schedule RC-C, part 1, and not reported as past due or nonaccrual in Schedule RC-N, Memorandum item 1):			M.1.
a. Construction, land development, and other land loans:			M.1.a.
1. 1-4 family residential construction loans.....	RCONK158	0	M.1.a.1.
2. Other construction loans and all land development and other land loans.....	RCONK159	1,102	M.1.a.2.
b. Loans secured by 1-4 family residential properties.....	RCONF576	5,174	M.1.b.
c. Secured by multifamily (5 or more) residential properties.....	RCONK160	0	M.1.c.
d. Secured by nonfarm nonresidential properties:			M.1.d.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK161	967	M.1.d.1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONK162	0	M.1.d.2.
e. Commercial and industrial loans.....	RCONK256	0	M.1.e.
<i>Memorandum items 1.e.(1) and (2) are to be completed by banks with \$300 million or more in total assets (sum of Memorandum items 1.e.(1) and (2) must equal Memorandum item 1.e):</i>			
1. To U.S. addressees (domicile).....	RCONK163	0	M.1.e.1.
2. To non-U.S. addressees (domicile).....	RCONK164	0	M.1.e.2.
f. All other loans (include loans to individuals for household, family, and other personal expenditures).....	RCONK165	131	M.1.f.
1. Loans secured by farmland.....	RCONK166	0	M.1.f.1.
2. Not applicable			M.1.f.2.
3. Not applicable			M.1.f.3.
4. Loans to individuals for household, family, and other personal expenditures:			M.1.f.4.
a. Credit cards.....	RCONK098	0	M.1.f.4.a.
b. Automobile loans.....	RCONK203	0	M.1.f.4.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCONK204	0	M.1.f.4.c.
<i>Memorandum item 1.f.(5) is to be completed by:</i> <i>* Banks with \$300 million or more in total assets</i> <i>* Banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans</i>			
5. Loans to finance agricultural production and other loans to farmers included in Schedule RC-C, part I, Memorandum item 1.f, above ¹	RCONK168	0	M.1.f.5.
g. Total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a.(1) through 1.f).....	RCONHK25	7,374	M.1.g.
2. Maturity and repricing data for loans and leases (excluding those in nonaccrual status):			M.2.
a. Closed-end loans secured by first liens on 1-4 family residential properties (reported in Schedule RC-C, part I, item 1.c.(2)(a), column B, above) with a remaining maturity or next repricing date of:			M.2.a.
1. Three months or less.....	RCONA564	1,311,918	M.2.a.1.
2. Over three months through 12 months.....	RCONA565	28,318	M.2.a.2.
3. Over one year through three years.....	RCONA566	36,556	M.2.a.3.
4. Over three years through five years.....	RCONA567	120,575	M.2.a.4.
5. Over five years through 15 years.....	RCONA568	156,873	M.2.a.5.
6. Over 15 years.....	RCONA569	69,229	M.2.a.6.
b. All loans and leases (reported in Schedule RC-C, part I, items 1 through 10, column B, above) EXCLUDING closed-end loans secured by first liens on 1-4 family residential properties (reported in Schedule RC-C, part I, item 1.c.(2)(a), column B, above) with a remaining maturity or next repricing date of:			M.2.b.
1. Three months or less.....	RCONA570	678,550	M.2.b.1.
2. Over three months through 12 months.....	RCONA571	67,990	M.2.b.2.
3. Over one year through three years.....	RCONA572	30,889	M.2.b.3.
4. Over three years through five years.....	RCONA573	33,097	M.2.b.4.
5. Over five years through 15 years.....	RCONA574	26,016	M.2.b.5.
6. Over 15 years.....	RCONA575	146,463	M.2.b.6.
c. Loans and leases (reported in Schedule RC-C, part I, items 1 through 10, column B, above) with a REMAINING MATURITY of one year or less (excluding those in nonaccrual status).....	RCONA247	9,410	M.2.c.
3. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-C, part I, items 4 and 9, column B ⁶	RCON2746	0	M.3.
4. Adjustable rate closed-end loans secured by first liens on 1-4 family residential properties (included in Schedule RC-C, part I, item 1.c.(2)(a), column B).....	RCON5370	332,641	M.4.

1. The \$300 million asset size test and the 5 percent of total loans test are based on the total assets and total loans reported on the June 30, 2018, Report of Condition.

6. Exclude loans secured by real estate that are included in Schedule RC-C, Part I, items 1.a through 1.e, column B.

Dollar amounts in thousands

<i>To be completed by banks with \$300 million or more in total assets:</i>		
5. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RC-C, Part I, items 1.a through 1.e, column B) ²	RCONB837	0 M.5.
<i>Memorandum item 6 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.</i>		
6. Outstanding credit card fees and finance charges included in Schedule RC-C, part I, item 6.a.....	RCONC391	NR M.6.
<i>Memorandum items 7.a, 7.b, and 8.a are to be completed by all banks semiannually in the June and December reports only.</i>		
7. Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3) (exclude loans held for sale): ³		M.7.
a. Outstanding balance.....	RCONC779	0 M.7.a.
b. Amount included in Schedule RC-C, part I, items 1 through 9.....	RCONC780	0 M.7.b.
8. Closed-end loans with negative amortization features secured by 1-4 family residential properties:		M.8.
a. Total amount of closed-end loans with negative amortization features secured by 1-4 family residential properties (included in Schedule RC-C, part I, items 1.c.(2)(a) and 1.c.(2)(b)).....	RCONF230	0 M.8.a.
<i>Memorandum items 8.b and 8.c are to be completed semiannually in the June and December reports only by banks that had closed-end loans with negative amortization features secured by 1-4 family residential properties (as reported in Schedule RC-C, Part I, Memorandum item 8.a) as of December 31, 2019, that exceeded the lesser of \$100 million or 5 percent of total loans and leases held for investment and held for sale (as reported in Schedule RC-C, Part I, item 12, column B).</i>		
b. Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1-4 family residential properties.....	RCONF231	NR M.8.b.
c. Total amount of negative amortization on closed-end loans secured by 1-4 family residential properties included in the amount reported in Memorandum item 8.a above.....	RCONF232	NR M.8.c.
9. Loans secured by 1-4 family residential properties in process of foreclosure (included in Schedule RC-C, part I, items 1.c.(1), 1.c.(2)(a), and 1.c.(2)(b)).....	RCONF577	0 M.9.
10. Not applicable		M.10.

2. The \$300 million asset size test is based on the total assets reported on the June 30, 2018, Report of Condition.
3. Memorandum item 7 is to be completed only by institutions that have not yet adopted ASU 2016-13.

Dollar amounts in thousands

11. Not applicable M.11.

Dollar amounts in thousands		(Column A) Fair value of acquired loans and leases at acquisition date	(Column B) Gross contractual amounts receivable at acquisition date	(Column C) Best estimate at acquisition date of contractual cash flows not expected to be collected
Memorandum items 12.a, 12.b, 12.c, and 12.d are to be completed semiannually in the June and December reports only.				
12. Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year. ¹				
a. Loans secured by real estate.....	RCONG091	0	RCONG092	0
b. Commercial and industrial loans.....	RCONG094	0	RCONG095	0
c. Loans to individuals for household, family, and other personal expenditures.....	RCONG097	0	RCONG098	0
d. All other loans and all leases.....	RCONG100	0	RCONG101	0

Dollar amounts in thousands

<i>Memoranda item 13 is to be completed by banks that had construction, land development, and other land loans (as reported in Schedule RC-C, Part I, item 1.a, column B) that exceeded 100 percent of total capital (as reported in Schedule RC-R, Part I, item 35.a) as of December 31, 2019.</i>						M.13.
13. Construction, land development, and other land loans in domestic offices with interest reserves:						
a. Amount of loans that provide for the use of interest reserves (included in Schedule RC-C, part I, item 1.a, column B)	RCONG376	0				M.13.a.
b. Amount of interest capitalized from interest reserves on construction, land development, and other land loans that is included in interest and fee income on loans during the quarter (included in Schedule RI, item 1.a.(1)(a)(2)).	RIADG377	0				M.13.b.
<i>Memorandum item 14 is to be completed by all banks.</i>						
14. Pledged loans and leases.....	RCONG378	1,336,496				M.14.
<i>Memorandum item 15 is to be completed for the December report only.</i>						
15. Reverse mortgages:						M.15.
a. Reverse mortgages outstanding that are held for investment (included in Schedule RC-C, item 1.c, above):						M.15.a.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ466	0				M.15.a.1.
2. Proprietary reverse mortgages.....	RCONJ467	0				M.15.a.2.
b. Estimated number of reverse mortgage loan referrals to other lenders during the year from whom compensation has been received for services performed in connection with the origination of the reverse mortgages:						M.15.b.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ468	0				M.15.b.1.
2. Proprietary reverse mortgages.....	RCONJ469	0				M.15.b.2.
c. Principal amount of reverse mortgage originations that have been sold during the year:						M.15.c.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ470	0				M.15.c.1.
2. Proprietary reverse mortgages.....	RCONJ471	0				M.15.c.2.
16. Not applicable						M.16.
<i>Amounts reported in Memorandum items 17.a and 17.b will not be made available to the public on an individual institution basis.</i>						
17. Eligible loan modifications under Section 4013, Temporary Relief from Troubled Debt Restructurings, of the 2020 Coronavirus Aid, Relief, and Economic Security Act:						M.17.
a. Number of Section 4013 loans outstanding.....	RCONLG24	CONF				M.17.a.
b. Outstanding balance of Section 4013 loans.....	RCONLG25	CONF				M.17.b.

1. Institutions that have adopted ASU 2016-13 should report only loans held for investment not considered purchased credit-deteriorated in Memorandum item 12.

Schedule RC-C Part II - Loans to Small Businesses and Small Farms(Form Type - 041)

Report the number and amount currently outstanding as of the report date of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:
(1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was most recently approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date. (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender. (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

Dollar amounts in thousands

1. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, part I, items 1.e.(1) and 1.e.(2), and all or substantially all of the dollar volume of your bank's "Commercial and industrial loans" reported in Schedule RC-C, part I, item 4, have original amounts of \$100,000 or less.....	RCON6999	No	1.
If YES, complete items 2.a and 2.b below, skip items 3 and 4, and go to item 5. If NO and your bank has loans outstanding in either loan category, skip items 2.a and 2.b, complete items 3 and 4 below, and go to item 5. If NO and your bank has no loans outstanding in both loan categories, skip items 2 through 4, and go to item 5			2.
2. Report the total number of loans currently outstanding for each of the following Schedule RC-C, part I, loan categories: a. "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, part I, items 1.e.(1) and 1.e.(2).....	RCON5562	NR	2.a.
b. "Commercial and industrial loans" reported in Schedule RC-C, part I, item 4 ¹	RCON5563	NR	2.b.

Dollar amounts in thousands

	(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
3. Number and amount currently outstanding of "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, part I, items 1.e.(1) and 1.e.(2):					3.
a. With original amounts of \$100,000 or less.....	RCON5564	11	RCON5565	463	3.a.
b. With original amounts of more than \$100,000 through \$250,000.....	RCON5566	16	RCON5567	1,720	3.b.
c. With original amounts of more than \$250,000 through \$1,000,000.....	RCON5568	10	RCON5569	2,018	3.c.
4. Number and amount currently outstanding of "Commercial and industrial loans" reported in Schedule RC-C, part I, item 4:					4.
a. With original amounts of \$100,000 or less.....	RCON5570	1	RCON5571	54	4.a.
b. With original amounts of more than \$100,000 through \$250,000.....	RCON5572	1	RCON5573	196	4.b.
c. With original amounts of more than \$250,000 through \$1,000,000.....	RCON5574	0	RCON5575	0	4.c.

Dollar amounts in thousands

5. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, part I, item 1.b, and all or substantially all of the dollar volume of your bank's "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, part I, item 3, have original amounts of \$100,000 or less.....	RCON6860	No	5.
If YES, complete items 6.a and 6.b below, and do not complete items 7 and 8. If NO and your bank has loans outstanding in either loan category, skip items 6.a and 6.b and complete items 7 and 8 below. If NO and your bank has no loans outstanding in both loan categories, do not complete items 6 through 8.			6.
6. Report the total number of loans currently outstanding for each of the following Schedule RC-C, part I, loan categories: a. "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, part I, item 1.b.....	RCON5576	NR	6.a.
b. "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, part I, item 3.....	RCON5577	NR	6.b.

Dollar amounts in thousands

	(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
7. Number and amount currently outstanding of "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, part I, item 1.b:					7.
a. With original amounts of \$100,000 or less.....	RCON5578	1	RCON5579	72	7.a.
b. With original amounts of more than \$100,000 through \$250,000.....	RCON5580	1	RCON5581	131	7.b.
c. With original amounts of more than \$250,000 through \$500,000.....	RCON5582	0	RCON5583	0	7.c.
8. Number and amount currently outstanding of "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, part I, item 3:					8.
a. With original amounts of \$100,000 or less.....	RCON5584	0	RCON5585	0	8.a.
b. With original amounts of more than \$100,000 through \$250,000.....	RCON5586	0	RCON5587	0	8.b.
c. With original amounts of more than \$250,000 through \$500,000.....	RCON5588	0	RCON5589	0	8.c.

APPENDIX D

2021 FFIEC Census Report - Selected Summary Census Housing, Income & Population Information
State: 26 - MICHIGAN (MI)
County: 081 - KENT COUNTY
Tract: All Tracts

County Code	Tract Code	Tract Income Level	Tract Median Family Income %	2021 FFIEC Est. MSA/MD Median Family Income	2021 Est. Tract Median Family Income	Tract Population	% Below Poverty Line	Population Below Poverty Line (calculated)	Number of Families	# of Housholds	Total Housing Units	Owner-Occupied Units	1- to 4- Family Units	Vacant Units	Owner-Occupied 1- to 4- Family Units	Renter Occupied Units
81	8.00	Low	43.8	76,600	33,574	3,238	40.1	1,298	735	1,092	1,251	464	1,232	159	464	628
81	13.00	Low	33.2	76,600	25,439	3,602	44.8	1,614	682	1,257	1,465	377	1,361	208	377	880
81	15.00	Low	37.6	76,600	28,771	3,487	46.5	1,620	662	1,293	1,532	381	1,223	239	258	912
81	26.00	Low	34.4	76,600	26,312	3,602	56.8	2,046	759	921	1,128	319	1,052	207	319	602
81	28.00	Low	32.0	76,600	24,535	1,684	55.6	936	338	590	728	131	510	138	131	459
81	31.00	Low	45.8	76,600	35,098	3,191	31.4	1,002	727	1,053	1,326	502	1,274	273	502	551
81	32.00	Low	40.2	76,600	30,816	4,835	53.8	2,599	1,000	1,520	1,854	655	1,854	334	655	865
81	36.00	Low	34.4	76,600	26,381	2,743	48.2	1,321	468	726	829	329	744	103	326	397
81	38.00	Low	40.7	76,600	31,161	4,475	54.0	2,418	815	1,093	1,257	468	1,257	164	468	625
81	39.00	Low	42.3	76,600	32,394	3,568	48.3	1,724	690	848	954	404	929	106	404	444
81	40.00	Low	49.9	76,600	38,200	3,885	35.9	1,393	741	974	1,083	489	1,026	109	489	485
Totals:						38,310	46.8	17,972	7,617	11,367	13,407	4,519	12,462	2,040	4,393	6,848
Percent of County Totals:						6.2%			4.9%	4.9%	5.4%	2.8%	6.0%	13.4%	2.8%	9.4%
Pop. Below Poverty Line as % of County Pop.:						2.9%										
81	1.00	Moderate	79.9	76,600	61,234	2,315	11.6	269	575	995	1,037	604	737	42	604	391
81	9.00	Moderate	52.7	76,600	40,330	3,059	38.1	1,165	636	1,151	1,271	677	1,266	120	677	474
81	11.01	Moderate	65.6	76,600	50,234	5,427	18.5	1,004	1,157	2,142	2,160	1,008	1,604	18	969	1,134
81	11.02	Moderate	61.7	76,600	47,262	4,203	26.9	1,131	1,085	1,985	2,090	830	1,530	105	820	1,155
81	12.00	Moderate	73.5	76,600	56,263	3,490	19.8	692	687	1,411	1,544	869	1,329	133	869	542
81	14.00	Moderate	70.5	76,600	54,034	2,228	39.2	874	338	1,056	1,242	311	763	186	218	745
81	16.00	Moderate	51.4	76,600	39,334	5,361	27.5	1,472	1,049	2,021	2,431	989	2,245	410	989	1,032
81	19.00	Moderate	75.7	76,600	57,963	4,771	25.4	1,212	865	1,867	2,275	838	1,979	408	701	1,029
81	22.00	Moderate	78.3	76,600	60,008	4,665	25.3	1,179	742	2,091	2,260	787	2,090	169	713	1,304
81	27.00	Moderate	66.5	76,600	50,916	3,510	35.9	1,260	617	1,234	1,477	614	1,456	243	606	620
81	30.00	Moderate	66.3	76,600	50,809	1,723	26.4	456	323	643	736	266	689	93	266	377
81	35.00	Moderate	56.5	76,600	43,248	5,743	30.4	1,748	1,210	2,126	2,282	1,074	2,057	156	1,074	1,052
81	37.00	Moderate	59.4	76,600	45,462	4,600	39.0	1,795	1,023	1,315	1,558	775	1,479	243	775	540
81	102.00	Moderate	76.6	76,600	58,660	4,337	24.1	1,043	1,030	1,494	1,604	1,046	1,441	110	1,046	448
81	104.02	Moderate	78.5	76,600	60,100	4,071	12.9	526	1,047	1,638	1,720	993	1,290	82	984	645
81	114.06	Moderate	50.1	76,600	38,384	5,785	38.0	2,197	1,392	2,334	2,494	401	574	160	401	1,933
81	115.00	Moderate	76.6	76,600	58,668	7,369	16.6	1,225	1,644	3,146	3,277	1,350	1,771	131	1,350	1,796
81	126.06	Moderate	51.3	76,600	39,258	5,581	26.0	1,448	1,347	2,315	2,523	395	1,092	208	356	1,920
81	126.07	Moderate	61.7	76,600	47,255	5,967	18.6	1,112	1,256	2,835	3,098	811	803	263	566	2,024
81	127.01	Moderate	76.2	76,600	58,392	7,059	18.6	1,313	1,776	2,685	2,725	1,098	1,792	40	1,098	1,587
81	129.01	Moderate	50.9	76,600	38,966	4,459	34.7	1,545	1,229	1,854	1,883	1,330	1,701	29	1,282	524
81	133.00	Moderate	59.4	76,600	45,523	4,662	26.7	1,243	1,074	1,468	1,653	964	1,623	185	964	504
81	135.00	Moderate	57.5	76,600	44,014	4,577	25.4	1,161	897	1,778	1,827	929	1,395	49	888	849
81	136.00	Moderate	67.2	76,600	51,475	2,030	19.4	394	493	710	944	457	742	234	457	253
81	137.00	Moderate	66.8	76,600	51,161	6,874	15.4	1,056	1,702	2,655	2,770	1,971	2,310	115	1,971	684
81	138.01	Moderate	67.2	76,600	51,437	1,547	15.3	236	380	766	766	440	552	0	378	326
81	138.02	Moderate	59.7	76,600	45,761	7,200	21.6	1,554	1,678	2,952	3,060	859	1,335	108	836	2,093
81	142.00	Moderate	77.5	76,600	59,380	4,104	15.1	619	954	1,344	1,449	879	1,427	105	879	465
81	143.00	Moderate	77.8	76,600	59,610	3,243	17.2	559	799	1,113	1,188	879	1,084	75	879	234
81	147.01	Moderate	62.8	76,600	48,067	3,408	28.1	957	804	1,268	1,341	1,001	1,233	73	977	267
81	147.03	Moderate	58.0	76,600	44,390	4,313	20.7	891	1,073	1,745	1,973	929	1,464	228	929	816
Totals:						137,681	24.5	33,336	30,882	54,137	58,658	26,374	42,853	4,521	25,522	27,763
Percent of County Totals:						22.1%			20.0%	23.2%	23.6%	16.5%	20.6%	29.6%	16.3%	38.1%
Pop. Below Poverty Line as % of County Pop.:						5.4%										
TOTALS	All Tracts					622,590			154,417	232,961	248,224	160,040	207,590	15,263	157,014	72,921