



## **PUBLIC DISCLOSURE**

November 14, 2022

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

First National Bank  
Charter Number: 446

223 Main Street  
Damariscotta, ME 04543

Office of the Comptroller of the Currency

75 Federal Street  
Suite 805  
Boston, MA 02110

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

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

The following table indicates the performance level of First National Bank (FNB or the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on the Satisfactory rating in the state of Maine (ME). Lending levels reflect good responsiveness to assessment area (AA) credit needs, adequate geographic distribution of loans, and an excellent distribution of loans among individuals of different income levels and businesses of different sizes. The bank made a low level of community development (CD) loans during the evaluation period.
- The Investment Test rating is based on the High Satisfactory rating in the state of ME. The bank has a significant level of qualified CD investments and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.
- The Service Test rating is based on the High Satisfactory rating in the state of ME. Delivery systems are accessible to essentially all portions of the bank's AAs. The bank provides a relatively high level of CD services consistent with its capacity and ability, especially given challenges with the pandemic.

## Lending in Assessment Area

A substantial majority of the bank's loans are located within its AAs.

The bank originated and/or purchased 91.7 percent and 88.3 percent, by number and dollar amount respectively, of its total loans inside the AAs during the evaluation period of January 1, 2019, through December 31, 2021. This analysis is performed at a bank-wide level, rather than the AA level.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
<b>Home Mortgage</b>	2,945	91.3	280	8.7	3,225	661,202	89.9	74,425	10.1	735,627
<b>Small Business</b>	3,526	91.7	318	8.3	3,844	353,045	85.8	58,470	14.2	411,515
<b>Small Farm</b>	886	92.6	71	7.4	957	40,760	86.7	6,271	13.3	47,031
<b>Total</b>	<b>7,357</b>	<b>91.7</b>	<b>669</b>	<b>8.3</b>	<b>8,026</b>	<b>1,055,007</b>	<b>88.3</b>	<b>139,166</b>	<b>11.7</b>	<b>1,194,173</b>

## Description of Institution

FNB is a single state financial institution headquartered in Damariscotta, ME with \$2.5 billion in total assets as of December 31, 2021. The bank is a wholly owned subsidiary of The First Bancorp, Inc., a financial services holding company based in the state of ME and that trades publicly via the NASDAQ stock exchange. The holding company reports \$231,447 in assets as of June 30, 2022. The bank does offer trust and investment management services through the bank's First National Wealth Management and First National Investment Services divisions. These activities were not included in the scope of this evaluation.

The bank's rating area consists of two separate AAs in the state of ME. Within the banks two AAs, FNB operates 17 full-service branches, including the main office, primarily serving Maine's mid-coast region with automated teller machines (ATMs) at all bank locations. In addition to traditional loan and deposit service offerings, FNB also provides on-line and mobile bill pay services to its customers. The main office is located at 223 Main Street, Damariscotta, ME, in a middle-income tract, and during the evaluation period, January 1, 2019, to December 31, 2021, the bank opened one branch in Belfast, ME within Waldo County and did not close any branches. Two of the bank's 17 branch/office locations are located within moderate-income geographies while the remaining branches are dispersed among middle- and upper-income tracts. We noted the bank's AAs do not contain any low-income geographies.

As of December 31, 2021, FNB reported total assets, total deposits, and tier 1 capital of approximately \$2.5 billion, \$2.1 billion, and \$214.9 million, respectively. The loan portfolio totaled approximately \$1.6 billion or 65.4 percent of total assets.

The table below provides a summary of the loan mix as of December 31, 2021:

<b>Loan Portfolio Summary by Loan Product December 31, 2021</b>	
<b>Loan Category</b>	<b>% of Gross Loans and Leases</b>
<b>1-4 Family Residential Mortgages – Closed End</b>	33.5
<b>Non-farm Non-residential Real Estate</b>	30.9
<b>Commercial &amp; Industrial</b>	13.7
<b>Construction &amp; Development</b>	6.7
<b>Home Equity</b>	4.5
<b>Multifamily</b>	4.0
<b>Municipal Loans</b>	2.9
<b>Agricultural Loans/Farmland</b>	2.4
<b>Consumer</b>	1.4
<b>Other</b>	<1
<b>Total</b>	100.0

*Source: Federal Deposit Insurance Corporation Call Report, December 31, 2021.*

The bank has no financial or legal impediments in meeting the credit needs of the AAs. The bank was rated ‘Satisfactory’ using Large Bank (LB) procedures at the last CRA performance evaluation dated September 30, 2019.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

FNB was evaluated using LB procedures, which assess the bank’s CRA performance according to three different testing criteria, including a Lending Test, Investment Test, and a Service Test. The bank’s performance was assessed using Home Mortgage Disclosure Act (HMDA)-reportable home mortgage loans and CRA-reportable small business and small farm loans originated and purchased during the evaluation period, which spanned from January 1, 2019, through December 31, 2021. Performance also included an assessment of CD activities occurring during the same time-period.

Management provided home mortgage information for 2019, 2020, and 2021 as required by HMDA. Management provided small business and small farm information for 2019, 2020, and 2021 as required by the CRA. Management did not submit any consumer loan data for consideration as part of this evaluation’s scope. Examiners verified CD activities submitted by management.

As indicated in Lending Inside and Outside of the Assessment Area Table above, the primary lending products originated/purchased during the evaluation period were home mortgage, small businesses, and small farm loans which accounted for 40.2 percent, 47.9 percent, and 11.9 percent, respectively, of all loan originations by number.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under the State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank's overall rating is based primarily on the state rating applied to the AA that received the full-scope review.

As previously discussed FNB's primary lending products during the evaluation period were identified to be small business, home mortgage, and small farm loans based on origination activity. Bank-wide amongst the three product types, consideration was first assigned to the bank's small business loans, then home mortgage, and lastly small farm lending as these product types accounted for 47.9 percent, 40.0 percent, and 12.0 percent, respectively, of all loan originations in the AAs during the evaluation period by number, which is similar to the percent of all loan originations identified above.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

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

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

## State Rating

### State of Maine

<b>CRA rating for the State of Maine:</b>	Satisfactory
<b>The Lending Test is rated:</b>	Satisfactory
<b>The Investment Test is rated:</b>	High Satisfactory
<b>The Service Test is rated:</b>	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits an adequate geographic distribution of loans in its AAs.
- The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution.
- The bank made a low level of CD loans in the state.
- The bank has a significant level of qualified CD investments and donations in the state.
- The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.
- Delivery systems are accessible to essentially all portions of the bank's AAs.
- The bank provides a relatively high level of CD services.

### Description of Institution's Operations in Maine

The state of ME represents FNB's primary area of operations. As discussed previously, the bank's ME-based AAs are comprised of two separate AAs, the full-scope ME non-MSA AA and the limited-scope Bangor ME MSA AA, however banking operations do not significantly differ between the two AAs. The AAs consists of wholly contiguous political subdivisions in ME and do not arbitrarily exclude any low- or moderate-income geographies nor does the AA delineation contain any unexplained or conspicuous gaps. As discussed previously, the bank's AAs include all 17 of the bank's branch/office locations, 16 within the full-scope ME non-MSA AA and one within the limited-scope Bangor ME MSA AA as of December 31, 2021. For the full-scope AA, the rating area includes a total of 61 census tracts, including four moderate-, 40 middle-, and 13 upper-income census tracts while the remaining four tracts were not assigned an income classification as of the 2015 ACS Census Update. For the limited-scope AA, the rating area includes a total of 46 census tracts, including eight moderate-, 27 middle-, and ten upper-income census tracts while the remaining tract was not assigned an income classification as of the 2015 ACS Census Update. Lastly, neither the full-scope or limited-scope AAs contain any low-income census tracts as of the 2015 ACS Census Update. For geographic and borrower distribution analyses, loans originated during the evaluation years of 2019, 2020, and 2021 were compared to the 2015 ACS data and 2021 Dun & Bradstreet (D&B) data. Peer 2021 deposit market share data is as of June 30, 2021, based on information from the Federal Deposit Insurance Corporation (FDIC).

The bank's primary business focus is to originate loans funded by core deposits, and the bank faces significant competition for deposits in both the full- and limited-scope AAs. As of June 30, 2021, peer deposit market share data, leading competitors for deposits in the ME non-MSA AA include The

Camden National Bank, FNB, Bar Harbor Bank & Trust, Bangor Savings Bank, and Machias Savings Bank. These top five banks account for approximately 85.8 percent of the area's deposits with FNB ranking second in deposit market share among 15 competitors with 24.5 percent market share. Outside of the top five banks, in this space all remaining banks individually maintained less than 3.0 percent market share. In the limited-scope Bangor ME MSA AA, peer deposit market share data as of June 30, 2021, leading competitors in deposits include Bangor Savings Bank, TD Bank, National Association, Main Savings, Machias Savings Bank, and The Camden National Bank. These top five banks account for approximately 67.0 percent of the area's deposits with FNB ranking 14<sup>th</sup> in deposit market share among 17 competitors with 1.4 percent market share. Outside of the top five bank in this space, all remaining banks individually maintained less than 7.0 percent market share.

As part of performance context when evaluating the bank's lending, we considered the disparity between the median income of families within the full-scope AA compared to the median cost of housing and overall impact to homeownership. Within the ME non-MSA AA approximately 9.7 percent of families were noted as being below the poverty level and 38.5 percent of households are low- or moderate-income. We noted 44.4 percent of households were classified as upper-income households. This information can be found in Table A below. Elevated home prices in the ME non-MSA geographies limits the availability of affordable housing, particularly for low-income groups as the housing market appreciated over the evaluation period. Specifically, based on 2021 median family income data reported for ME non-MSA geographies low-income families earning approximately no more than \$27,431 or 50 percent of the region's median family income would find it challenging to qualify for a mortgage loan given the area's \$188,187 median housing value.

As reported by Moody's Analytics, Inc. in September 2021, economic indicators show the state of ME is currently in the recovery stage of the credit cycle, as the labor market continues to recover from pandemic pressures but still lags the region and nation due to the state's aging workforce. The Bureau of Labor Statistics indicates the state unemployment rate in August 2021 of 4.8 percent has improved following the pandemic height of 9.4 percent in May 2020 but still remains higher than prior years. Despite strong demand for healthcare and tourism, labor shortages continue to impede economic growth. Over the next four years, ME will have the second largest share of retirees nationwide and the second smallest share of prime-age workers.

A community contact was unable to be made during the evaluation; however, we referenced a recent economic presentation for the state of ME made by a state economist. This presentation supported information about needs of the AA from prior community contacts. The economic presentation indicated that rising housing costs have created a need for affordable housing, particularly for low- and moderate-income families. In addition to affordable housing needs, community needs within ME include access to social services and affordable child-care for low- and moderate-income groups. Additionally, the economic presentation indicated that the state's population continues to age, exacerbating community needs for low- and moderate-income senior citizens.



**ME non-MSA AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: ME non-MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	61	0.0	6.6	65.6	21.3	6.6
Population by Geography	199,704	0.0	5.6	72.4	22.0	0.0
Housing Units by Geography	132,634	0.0	6.9	67.4	25.7	0.0
Owner-Occupied Units by Geography	66,337	0.0	5.2	71.0	23.8	0.0
Occupied Rental Units by Geography	20,936	0.0	6.8	73.4	19.9	0.0
Vacant Units by Geography	45,361	0.0	9.3	59.4	31.3	0.0
Businesses by Geography	15,733	0.0	4.7	67.6	27.8	0.0
Farms by Geography	886	0.0	4.5	72.1	23.4	0.0
Family Distribution by Income Level	54,364	18.4	17.6	21.6	42.5	0.0
Household Distribution by Income Level	87,273	22.6	15.9	17.2	44.4	0.0
Median Family Income Non-MSAs - ME		\$54,862	Median Housing Value			\$188,187
			Median Gross Rent			\$746
			Families Below Poverty Level			9.7%

*Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) The NA category consists of geographies that have not been assigned an income classification.*

**Scope of Evaluation in Maine**

FNB delineated two separate AAs in the state of ME for review under the requirements of the CRA. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. Amongst the two AAs, the ME non-MSA AA was designated as full-scope while the Bangor ME MSA AA was designated as limited-scope as the majority of the bank's lending and deposit activity during the evaluation period was based within the ME non-MSA AA. Specifically, from January 1, 2019, through December 31, 2021, approximately 88.0 percent of primary product lending within the AAs was in the ME non-MSA AA based on number of loans. Additionally, via FDIC deposit market share reporting as of June 30, 2021, approximately 96.2 percent of the bank's deposit base and 94.1 percent of the bank's branches were located within the ME non-MSA AA. The bank's full-scope ME non-MSA AA is comprised of 61 ME non-MSA census tracts, consists of wholly contiguous political subdivisions (counties), contains the majority of the bank's branch locations, and does not arbitrarily exclude any low- or moderate-income geographies. The limited-scope Bangor ME MSA AA is comprised of 46 Bangor, ME MSA census tracts, consists of whole contiguous political subdivisions (counties), contains the remaining bank branch locations, and does not arbitrarily exclude any low- or moderate-income geographies.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

### LENDING TEST

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

#### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the ME non-MSA AA is adequate.

#### Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
ME non-MSA AA+	2,561	3,035	880	12	6,488	88.0	96.2
Bangor ME MSA AA**	384	491	6	2	883	12.0	3.8

\*Table contains data for all AAs – the narrative below addresses performance in full-scope AAs only.

+Full Scope AA

\*\*Limited Scope AA

Dollar Volume of Loans (000's) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
ME non-MSA AA+	583,782	287,024	40,168	2,154	913,128	86.4	96.2
Bangor ME MSA AA**	77,420	66,021	592	222	144,255	13.6	3.8

\*Table contains data for all AAs – the narrative below addresses performance in full-scope AAs only.

+Full Scope AA

\*\*Limited Scope AA

The bank originated and/or purchased a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. According to peer June 30, 2021, deposit market share data, FNB reported approximately \$1.9 billion in deposits in the ME non-MSA AA which accounted for 24.5 percent of all ME non-MSA AA deposits.

Based on peer 2021 HMDA market share data, the bank ranked third among 271 lending banks for home mortgage loan originations and purchases, or the 99<sup>th</sup> percentile, with a market share of 9.8 percent which is lower than the bank's deposit market share. The top five home mortgage lenders, Bangor Savings Bank, The Camden National Bank, FNB, Rocket Mortgage, and Machias Savings Bank, had a combined market share of 43.1 percent. Market share for the top five lenders ranged from 11.6 percent to 5.1 percent.

Based on peer 2020 CRA small business loan data, the bank ranked first among 80 small business lenders, or the 99<sup>th</sup> percentile, with a market share of 23.2 percent which is near to the bank's deposit market share. The top five small business lenders, FNB, Camden National Bank, Machias Savings Bank, Bar Harbor Bank & Trust, American Express, National Bank, had a combined market share of 70.6 percent. Market share for the top five lenders ranged from 23.2 percent to 7.1 percent.

Based on 2020 CRA small farm loan data, the bank ranked second among 14 small farm lenders, or the 86<sup>th</sup> percentile, with a market share of 23.7 percent which is near to the bank's deposit market share. The top five small farm lenders, Machias Savings Bank, FNB, Camden National Bank, Bar Harbor Bank & Trust, and US Bank, NA, had a combined market share of 96.7 percent. Market share for the top five lenders ranged from 34.1 percent to less than one percent.

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

The bank exhibits an adequate geographic distribution of loans in its ME non-MSA AA.

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

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

The geographic distribution of home mortgage loans is adequate given performance context.

The AA does not include any low-income census tracts. The percentage of home mortgage loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied (OO) units and somewhat lower than aggregate lending in the AA.

The assessment of performance in moderate-income census tracts considered the limited number of OO housing units, approximately 5.2 percent or 3,450 units, of all AA OO units in these geographies and significant AA competition.

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

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

The geographic distribution of small loans to businesses is adequate given performance context.

The AA does not include any low-income census tracts. The percentage of small loans to businesses in moderate-income geographies was somewhat lower than the percentage of those businesses and aggregate lending in the AA.

The assessment of performance in moderate-income census tracts considered the limited number of businesses, approximately 740 or 4.7 percent of all AA businesses, in moderate-income geographies and AA competition.

***Small Loans to Farms***

Refer to Table S in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate given performance context.

The AA does not include any low-income census tracts. The percentage of small loans to farms in moderate-income geographies was lower than the percentage of those farms and aggregate lending in the AA.

The assessment of performance in moderate-income census tracts considered the limited number of farms, approximately 39.9 or 4.5 percent of all AA farms, in moderate-income geographies and AA competition.

***Lending Gap Analysis***

We reviewed demographic summary data and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans, and small loans to businesses and farms in the ME non-MSA AA during the evaluation period. The analysis did not identify any unexplained or conspicuous gaps, given performance context.

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

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

***Home Mortgage Loans***

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

The borrower distribution of home mortgage loans is excellent given performance context.

The percentage of home mortgage loans to low-income borrowers was lower than the percentage of low-income families and exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and exceeded aggregate lending in the AA.

The assessment of performance considered the affordability of home ownership for low-income borrowers in the AA given the comparably high median housing value. With a median family income of \$54,862, low-income borrowers earn less than \$27,431 per year and moderate-income borrowers earn no more than \$43,890 per year. The 2021 median housing value is \$188,187. If we assume a 5.0 percent interest rate and a 30 year mortgage, this results in a monthly payment of \$1,010 making it challenging for low income borrowers to purchase homes in the AA. This data does not account for a down payment, insurance costs, real estate taxes, or any additional monthly expenses. Additionally, FNB operates within a competitive market in the ME non-MSA AA for home mortgage lending for low- and moderate-income borrowers.

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

Refer to Table R in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent given performance context.

The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded both the percentage of those businesses and aggregate lending in the AA.

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

Refer to Table T in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of small loans to farms.

The borrower distribution of small loans to farms is excellent given performance context.

The percentage of small loans to farms with gross annual revenues of \$1 million or less exceeded both the percentage of those farms and aggregate lending in the AA.

### **Community Development Lending**

The bank made a low level of CD loans in the state of Maine.

The Lending Activity Tables, shown above on page 9, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans, but do not contain data pertaining to the bank's participation in the Small Business Administration's (SBA) Payment Protection Plan (PPP) program as part of the national response to economic pressures imposed by the Covid-19 pandemic. For PPP lending in the ME non-MSA AA, the bank made approximately 2,602 instances of PPP lending totaling approximately \$120.7 million during the 2020 and 2021 program years. Specifically, during 2020, the bank made 1,477 PPP loans in the ME non-MSA AA totaling approximately \$75.9 million, and during 2021, the bank made 1,125 PPP loans in the AA totaling approximately \$44.8 million.

CD lending in the state of ME is considered poor and is reflected by the bank's low level of CD lending within the ME non-MSA AA. During the evaluation period, FNB originated a total of 12 qualified CD loans to nine different community organizations within the AA. Qualified CD loans totaled \$2.2 million or approximately 1.0 percent of allocated tier 1 capital as of December 31, 2021. Allocated tier 1 capital is attributed based on each AA's deposit market share. The CD loans originated by the bank largely served as financing for local community groups that provide affordable housing and community services to low- and moderate-income geographies and populations.

CD loans submitted for consideration were not included in the primary product lending analysis. The highlights of the bank's CD loans are as follows:

- Two Small Business Association (SBA) approved CD-qualified loans to a small business operating in the ME non-MSA AA totaling \$463,000 and \$651,800. The purpose of the SBA loans were to provide financing and expansion of operations enabling the creation of jobs, including those for low-

and moderate-income populations.

- A \$323,300 CD-qualified loan to a non-profit community development network operating in the state of ME that provides services focused within the ME non-MSA AA. The CD organization specializes in offering community services, including health and elderly care, for low- and moderate-income populations in the state.
- A \$47,400 CD-qualified loan to a local non-profit organization that provides community services for low- and moderate-income youths in the ME non-MSA AA, including education and job training programs.

### **Product Innovation and Flexibility**

The bank makes limited use of innovative and flexible lending practices in order to serve credit needs in the ME non-MSA AA and greater statewide region. The bank offers a standard array of lending products and services for customers in ME with varied delivery channels available depending on customer's personal and business banking needs. Specifically, FNB continues to participate in the Maine State Housing Authority first time homebuyer lending program and is an approved lender for the varied SBA program offerings, including 7a, 504, and PPP lending.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the lending test in the Bangor ME MSA AA is consistent with the bank's overall performance under the lending test in the full-scope area; however, the bank's performance for CD lending in the limited-scope Bangor ME MSA AA was noted as stronger than the performance in the full-scope area.

For PPP lending in the Bangor ME MSA AA, the bank made approximately 207 instances of PPP lending totaling approximately \$14.0 million during the 2020 and 2021 program years. Specifically, during 2020, the bank made 132 PPP loans in the Bangor ME MSA AA totaling approximately \$10.2 million, and during 2021, the bank made 75 PPP loans in the AA totaling approximately \$3.7 million.

CD lending in the Bangor ME MSA AA is considered adequate. During the evaluation period, FNB originated a total of two qualified CD loans to a single community organization in the AA that provides community and housing services for low- and moderate-income groups. Qualified CD loans totaled approximately \$222,109 or 2.7 percent of allocated tier 1 capital as of December 31, 2021, meeting the standard for adequate performance. While the submitted number of CD loans was greater than the qualified amount, one loan did not meet the definition of CD and therefore did not receive credit.

Refer to Tables O through T in the state of Maine section of appendix D for the facts and data used to support conclusions in the limited-scope Bangor ME MSA AA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Maine is rated High Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the ME non-MSA AA is good.

The bank has a significant level of qualified CD investments and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
<b>ME non-MSA AA+</b>	6	3,441	182	1,951	188	77.1	5,392	37.3
<b>Bangor ME MSA AA**</b>	1	390	23	492	24	9.8	882	6.1
<b>Statewide</b>	7	1,913	25	6,254	32	13.1	8,167	56.6

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

Table contains data for all AAs and statewide investment activity – the narrative below addresses performance in full-scope AA and statewide only.

+Full Scope AA

\*\*Limited Scope AA

FNB's investments and donations demonstrate good responsiveness to credit and community development needs of the ME non-MSA AA. Within the full-scope AA specifically, qualified investments totaled approximately \$5.1 million or 2.5 percent of allocated tier 1 capital as of December 31, 2021. The bank made two new investments in pools of mortgage-backed securities during the evaluation period totaling \$1.6 million to benefit low- and moderate-income geographies and groups within the full-scope AA. As of this evaluation, the bank also had six prior period investments earmarked to the ME non-MSA AA totaling approximately \$3.4 million. When considering the overall responsiveness, we gave credit to the bank's performance in the broader statewide area and the limited scope Bangor ME MSA AA, which is discussed in more detail below. For qualified donations, FNB made 180 CD-eligible donations amongst a variety of community organizations operating within the full-scope ME non-MSA AA, totaling approximately \$318,175 or 0.15 percent of tier 1 capital for the evaluation period. Donations were made to qualified CD organizations that largely promote community services targeted towards low- and moderate-income populations and support affordable housing and economic development initiatives in ME. While the bank's actual level of charitable giving in its surrounding communities was higher, these 180 instances of giving within the full-scope AA were verified as meeting the definition of CD.

The highlights of the bank's CD investments in the ME non-MSA AA are as follows:

- A \$1.0 million prior period investment in a community organization that supports housing needs for low- and moderate-income seniors in Eastport and Camden ME.
- A \$926,064 current period investment in a pool of mortgage-backed securities that are targeted towards CRA eligible affordable housing project in Lincoln, Knox, and Hancock Counties, ME.
- A \$693,186 prior period investment in a CD-qualified housing fund that promotes affordable housing projects in the northern New England region. This specific investment is targeted towards housing development in Hancock County, ME.
- A \$211,001 prior period investment in an affordable housing investment fund that operates

predominantly in both the ME and New Hampshire regions promoting housing and community development, with this specific fund earmarked to projects in Knox County, ME.

The highlights of the bank's CD donations in the ME non-MSA AA are as follows:

- A \$5,100 donation to a nonprofit community organization operating in the Ellsworth, ME region that provides community services improving the quality of life and reducing the impact of poverty among low- and moderate income populations.
- A \$5,200 donation to a nonprofit community service organization that serves the communities of Southwest Harbor, ME providing health and educational programs for low- and moderate-income youths.
- A \$5,000 donation to a community organization that operates in Lincoln County, ME as a food bank center with distribution throughout the county, providing food services to low- and moderate-income populations in the community.

### **Outside the AAs – Broader Statewide Area**

Statewide, the bank demonstrates good responsiveness to identified credit and community development needs by participating in CRA-qualified investment funds and pooled mortgage-backed securities that provides benefits in a large, regional scope which includes the bank's delineated AAs. Within ME, qualified investments totaled approximately \$8.1 million or 3.8 percent of bank-wide tier 1 capital as of December 31, 2021. The bank made seven new investments during the evaluation period totaling \$6.2 million to benefit low- and moderate-income geographies and groups in the state. As of this evaluation, the bank also had seven prior period investments earmarked to benefit the state of ME totaling approximately \$1.9 million. Additionally, statewide, FNB made 18 CD-eligible donations amongst several community groups that offer services in a larger geographical footprint that includes the bank's delineated AAs, totaling approximately \$65,300 for the evaluation period.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Investment Test in the Bangor ME MSA AA is stronger than the bank's overall performance under the Investment Test in the full-scope AA.

FNB demonstrates excellent responsiveness to credit and CD needs of the limited-scope Bangor ME MSA AA. Within the limited-scope AA specifically, qualified investments totaled \$859,417 or 10.4 percent of allocated tier 1 capital as of December 31, 2021. The bank made two new investments in historic tax credits supporting the redevelopment of low- and moderate-income geographies in the limited-scope AA totaling \$469,050. As of this evaluation, the bank also had one prior period investment earmarked to the Bangor ME MSA AA totaling \$390,367. Additionally, FNB made 21 CD-eligible donations totaling \$22,860 amongst several community groups that offer services in the limited-scope Bangor ME MSA AA.

### **SERVICE TEST**

The bank's performance under the Service Test in Maine is rated High Satisfactory.



## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the ME non-MSA AA is good.

### Retail Banking Services

Delivery systems are accessible to essentially all portions of the bank's ME non-MSA AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
ME non-MSA AA	96.2	16	94.1	0.0	6.3	62.5	31.3	0.0	5.6	72.4	22.0
Bangor ME MSA AA	3.8	1	5.9	0.0	100.0	0.0	0.0	0.0	16.4	56.3	24.3

*Due to rounding, totals may not equal 100.0 and 3.0 percent of the Bangor ME MSA AA population was located within geographies that were not assigned an income classification as of the 2015 ACS census. x\*Table contains data for all AAs – the narrative below addresses performance in full-scope AAs only.*

As of the end of our evaluation period, FNB maintains 16 branches within the ME non-MSA AA with one or 6.3 percent located in a moderate-income geography. The bank's distribution of their branch delivery system among moderate-income census tracts exceeds the percentage of the population located within moderate-income geographies. Additionally, two of the remaining 15 branches are located in middle-income census tracts in close proximity to moderate-income ME non-MSA AA geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Moderate	Middle	Upper
ME non-MSA AA	1	--	--	--	+1	--
Bangor ME MSA AA	--	--	--	--	--	--

*During the evaluation period of 1/1/2019 – 12/31/2021 the bank opened one new branch location in the ME non-MSA AA – no branches were closed within either rating area during the evaluation period. \*Table contains data for all AAs – the narrative below addresses performance in full-scope AAs only*

To the extent that changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. As previously discussed, since the last evaluation FNB opened a single new branch in the ME non-MSA AA in a middle-income census tract located at 1b Belmont Avenue, Belfast, ME during August 2020.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and individuals. Additionally, lobby hours and services provided in low- and moderate-income geographies are not dissimilar from those provided in middle- and upper-income geographies. Lobby hours are largely similar between all branches in the ME non-MSA AA, with branches generally opening by 8:30 AM and closing by 4:00 PM Monday through Thursday, and by 5:00 PM on Friday. The 3 Summit Road, Northeast Harbor, ME, branch location opens by 9:30 AM and closes by 3:30 PM Monday through Friday; no office locations offer lobby hours on Saturday or Sunday. Drive-up hours where available are largely uniform with the bank's lobby hours, opening by 8:00 AM and closing by 4:30 PM Monday through Wednesday, and by 5:00 PM Thursday and Friday. Additionally, all branch locations offer Saturday drive-up hours from 8:00 AM to noon except for the 63 Union Street, Rockland, ME location which is closed on Saturdays and the 3 Summit Road, Northeast Harbor, ME and 44 Elm Street, Camden, ME locations, which do not offer drive-up services. Drive-up services are not offered on Sundays at any branch locations.

### **Community Development Services**

The bank provides a relatively high level of CD services consistent with its capacity and ability.

During the evaluation period, 17 bank personnel provided approximately 678 service hours across 10 different qualified CD organizations that benefit both the ME non-MSA and Bangor ME MSA AAs. All service hours were provided to organizations that provide for community services or affordable housing needs for low- and/or moderate-income geographies or groups. While the number of submitted service hours was greater than the qualified amount, some services did not meet the definition of CD and/or were located outside of the delineated AA. Consideration was also given to the fact that two years of the evaluation period was during the pandemic where many businesses halted operations and ceased in person services.

The highlights of the bank's CD services are as follows:

- Eight employees provided technical services totaling 20 hours to a local community group that offers food and housing services to low- and moderate-income populations in the ME non-MSA and Bangor ME MSA AAs.
- A senior member of bank management provided 20 hours of service by serving on the board of a local community group that offers community services, including provision of food and shelter, for low- and moderate-income families in the ME non-MSA AA.
- Two bank employees provided 61 hours of technical expertise to a national affordable housing community organization that services low- and moderate-income households in the ME non-MSA and Bangor ME MSA AAs.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Bangor ME MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area.

During the evaluation period, one member of bank staff provided approximately 43 service hours to a qualified CD organization that benefits solely the Bangor ME MSA AA providing affordable housing needs for low- and/or moderate-income geographies or groups.

## Appendix A: Scope of Examination

The following table identifies the time-period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time-Period Reviewed:</b>	(01/01/2019 to 12/31/2021)	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and small farm loans Community Development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None reviewed.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Maine</b>		
ME non-MSA AA	Full-scope	<ul style="list-style-type: none"> <li>• ME non-MSA geographies <ul style="list-style-type: none"> <li>○ full Hancock, Knox, Lincoln, Waldo, and Washington Counties</li> </ul> </li> </ul>
Bangor ME MSA AA	Limited-scope	<ul style="list-style-type: none"> <li>• Bangor, ME MSA <ul style="list-style-type: none"> <li>○ full Penobscot County</li> </ul> </li> </ul>

## Appendix B: Summary of State Ratings

<b>RATINGS – FIRST NATIONAL BANK</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank State Rating</b>
<b>FIRST NATIONAL BANK</b>	Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
<b>State:</b>				
<b>Maine</b>	Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower

distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

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

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

county or counties as measured through commuting.

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “Bank” include activities of any affiliates that the Bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless



of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -**  
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
ME non-MSA AA	2,688	595,111	88.2	9,394	0.0	0.0	0.0	5.2	2.6	4.0	71.0	57.8	68.2	23.8	39.5	27.8	0.0	0.0	0.0	
Bangor ME MSA AA	358	69,294	11.8	6,173	0.0	0.0	0.0	13.4	13.1	10.0	61.0	47.2	58.5	25.3	39.1	31.2	0.3	0.6	0.2	
<b>Total</b>	<b>3,046</b>	<b>664,405</b>	<b>100.0</b>	<b>15,567</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.4</b>	<b>3.9</b>	<b>6.4</b>	<b>67.1</b>	<b>56.6</b>	<b>64.4</b>	<b>24.4</b>	<b>39.5</b>	<b>29.2</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 U.S Census; 01/01/2019 - 12/31/2021 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
ME non-MSA AA	2,688	595,111	88.2	9,394	18.4	4.2	3.7	17.6	15.0	13.8	21.6	21.1	20.2	42.5	55.8	50.3	0.0	4.0	12.0	
Bangor ME MSA AA	358	69,294	11.8	6,173	21.1	2.5	4.1	17.7	10.6	15.1	20.5	12.8	20.8	40.7	44.1	39.5	0.0	29.9	20.4	
<b>Total</b>	<b>3,046</b>	<b>664,405</b>	<b>100.0</b>	<b>15,567</b>	<b>19.5</b>	<b>4.0</b>	<b>3.9</b>	<b>17.6</b>	<b>14.4</b>	<b>14.3</b>	<b>21.1</b>	<b>20.1</b>	<b>20.5</b>	<b>41.7</b>	<b>54.4</b>	<b>46.0</b>	<b>0.0</b>	<b>7.0</b>	<b>15.3</b>	

Source: 2015 U.S Census; 01/01/2019 - 12/31/2021 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
ME non-MSA AA	3,035	287,024	86.1	7,524	0.0	0.0	0.0	4.7	2.5	3.8	67.6	54.9	64.3	27.8	42.6	31.9	0.0	0.0	0.0
Bangor ME MSA AA	491	66,021	13.9	3,448	0.0	0.0	0.0	19.8	17.9	13.2	50.0	55.4	56.1	29.1	26.7	30.5	1.0	0.0	0.2
<b>Total</b>	<b>3,526</b>	<b>353,045</b>	<b>100.0</b>	<b>10,972</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.4</b>	<b>4.7</b>	<b>6.8</b>	<b>61.0</b>	<b>55.0</b>	<b>61.7</b>	<b>28.3</b>	<b>40.4</b>	<b>31.4</b>	<b>0.4</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0.

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
ME non-MSA AA	3,035	287,024	86.1	7,524	84.2	86.9	43.8	4.9	13.1	10.8	0.0
Bangor ME MSA AA	491	66,021	13.9	3,448	78.6	80.9	34.5	6.6	19.1	14.8	0.0
<b>Total</b>	<b>3,526</b>	<b>353,045</b>	<b>100.0</b>	<b>10,972</b>	<b>82.1</b>	<b>86.0</b>	<b>40.9</b>	<b>5.5</b>	<b>14.0</b>	<b>12.3</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
ME non-MSA AA	880	40,168	99.3	1,906	0.0	0.0	0.0	4.5	2.0	5.6	72.1	69.4	74.8	23.4	28.5	19.6	0.0	0.0	0.0
Bangor ME MSA AA	6	592	0.8	80	0.0	0.0	0.0	10.4	0.0	2.5	64.6	50.0	77.5	24.9	50.0	20.0	0.0	0.0	0.0
<b>Total</b>	<b>886</b>	<b>40,760</b>	<b>100.0</b>	<b>1,986</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>6.2</b>	<b>2.0</b>	<b>5.5</b>	<b>70.0</b>	<b>69.3</b>	<b>74.9</b>	<b>23.8</b>	<b>28.7</b>	<b>19.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
ME non-MSA AA	880	40,168	99.3	1,906	97.4	97.8	43.3	2.1	2.2	0.5	0.0	
Bangor ME MSA AA	6	592	0.7	80	93.6	50.0	40.0	4.9	50.0	1.4	0.0	
<b>Total</b>	<b>886</b>	<b>40,760</b>	<b>100.0</b>	<b>1,986</b>	<b>96.3</b>	<b>97.5</b>	<b>43.2</b>	<b>2.9</b>	<b>2.5</b>	<b>0.7</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%.