

PUBLIC DISCLOSURE

December 8, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Maine Community Bank
Certificate Number: 17741

1 India Street
Portland, Maine 04101

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
New York Regional Office

350 Fifth Avenue, Suite 1200
New York, New York 10118

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of home mortgage and small business loans are in the institution's assessment areas.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels and businesses of different sizes.
- The institution did not receive any CRA related complaints since the prior evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

DESCRIPTION OF INSTITUTION

Maine Community Bank (MCB) is a state-chartered mutual savings bank headquartered in Portland, Maine (ME). MCB is a wholly owned subsidiary of Maine Community Bancorp, a mutual holding company. MCB received a “Satisfactory” rating at its prior FDIC Performance Evaluation, dated January 31, 2022, based on Interagency Intermediate Institution (ISI) examination procedures.

Since the previous examination, MCB has expanded its operations into several new municipalities with the Gorham Savings Bank (GSB), Gorham, ME acquisition. On January 1, 2025, MCB acquired Portland-based GSB, a \$1.6 billion institution (as of December 31, 2024).

Due to the timing of the MCB and GSB merger, examiners evaluated the bank’s Community Reinvestment Act (CRA) performance using ISI examination procedures and based on the bank’s assessment area prior to the merger, which included portions of Cumberland and York counties and all of Androscoggin County.

Operations

MCB is a residential and commercial lender that also offers consumer loans. Residential offerings include home mortgage; home equity loans and lines of credit; and government guaranteed mortgage loans through the Federal Home Loan Bank (FHLB) and Maine State Housing Authority (MSHA). Commercial loans include mortgages; lines of credit; term loans; construction loans; third-party credit cards; and government guaranteed loans through the FHLB, Small Business Administration (SBA), and Finance Authority of Maine. Consumer products include land loans, secured and unsecured installment loans, vehicle loans, and recreational vehicle loans. MCB provides various consumer and commercial deposit products and services, including checking, savings, money market accounts, health savings accounts, and certificates of deposit.

MCB currently operates 21 full-service branches, primarily serving southeast ME. MCB has branches in Auburn, Biddeford (2), Brunswick, East Waterboro, Falmouth (2), Gorham, Kennebunk, Lewiston, Portland (2), Scarborough (2), South Portland, Standish, Waterboro, Westbrook, Windham (2), and Yarmouth. Since the prior evaluation, the bank closed its Brunswick branch and opened another branch in Brunswick at a different address, but within the same moderate-income census tract. Additionally, following the merger with GSB, MCB moved its headquarters from Biddeford to Portland, ME. This location is not accessible to the public. The bank also has two business banking offices in Auburn and Portland.

With the merger, MCB acquired 11 of these branches from GSB. These branches included the following locations: East Waterboro, Gorham, Falmouth (2), Portland (2), Scarborough, South Portland, Standish, Windham, and Yarmouth. A Portland and South Portland branch are in moderate-income census tracts.

Alternative banking services, which supplement the branch network, include Automated Teller Machines (ATMs)/Video Teller Machines (VTMs); telephone, mobile, and online banking; and person-to-person payment applications. Deposit taking ATMs are available at each branch, full-

service standalone VTMs in Portland and Westbrook, and standalone ATMs in Naples (cash dispensing only) and Scarborough.

Ability and Capacity

As of September 30, 2025, deposits totaled approximately \$2.3 billion and assets totaled approximately \$2.8 billion. MCB’s portfolio included total loans of \$2.3 billion and total securities of \$235 million. Since the prior evaluation, total assets, loans, and deposits increased by 325.5 percent, 290.8 percent, and 262.2 percent, respectively. These increases were due to normal business growth and acquiring GSB.

The following table illustrates the loan portfolio as of September 30, 2025.

Loan Portfolio Distribution as of 09/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	76,402	3.3
Secured by Farmland	2,081	0.1
Secured by 1-4 Family Residential Properties	771,117	33.5
Secured by Multifamily (5 or more) Residential Properties	283,162	12.3
Secured by Nonfarm Nonresidential Properties	912,086	39.6
Total Real Estate Loans	2,044,848	88.7
Commercial and Industrial Loans	210,549	9.1
Agricultural Production and Other Loans to Farmers	5,776	0.3
Consumer Loans	5,937	0.3
Obligations of State and Political Subdivisions in the U.S.	1,758	0.1
Other Loans	3,529	0.2
Lease Financing Receivable (net of unearned income)	32,148	1.4
Less: Unearned Income	5	0.0
Total Loans	2,304,540	100.1
<i>Source: Reports of Condition and Income Due to rounding, totals may not equal 100%</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its supervisory agency will evaluate its CRA performance. MCB designated two contiguous assessment areas: the Portland-South Portland, ME Metropolitan Statistical Area (MSA) assessment area and the Lewiston-Auburn, ME MSA assessment area. The Portland-South Portland MSA assessment area includes portions of Cumberland and York Counties. The Lewiston-Auburn MSA assessment area includes all of Androscoggin County. This evaluation refers to the two assessment areas as the combined assessment area. Refer to the full-scope assessment area evaluations for more detail on each assessment area’s demographics.

With GSB’s acquisition, MCB expanded its Portland-South Portland MSA assessment area delineation to include full counties of Cumberland and York. As stated previously, the expanded assessment area will not be used at this current evaluation.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated January 31, 2022, to the current evaluation, dated December 8, 2025. Examiners used the ISI Examination Procedures to evaluate MCB’s CRA performance. These procedures include the Lending Test and Community Development Test. Please refer to the Appendices for a complete description of these tests.

Examiners conducted full-scope reviews of both assessment areas. As the Portland-South Portland MSA assessment area contains the largest volume of lending, deposits, and branches, it received the greatest weight. Examiners also conducted a full-scope review of the Lewiston-Auburn MSA assessment area, given the needs and opportunities for loans, investments, and services. The following tables reflect the bank’s loans, deposits, and branches by assessment area as of June 30, 2024, and June 30, 2025.

Combined Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Portland-South Portland MSA	734,677	76.6	619,194	71.7	8	80.0
Lewiston-Auburn MSA	224,431	23.4	244,454	28.3	2	20.0
Total	959,108	100.0	863,648	100.0	10	100.0
<i>Source: Bank Data; FDIC Summary of Deposits (06/30/2024)</i>						

Combined Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Portland-South Portland MSA	1,937,648	85.9	2,007,895	89.1	19	90.5
Lewiston-Auburn MSA	318,054	14.1	245,538	10.9	2	9.5
Total	2,255,702	100.0	2,253,433	100.0	21	100.0
<i>Source: Bank Data; FDIC Summary of Deposits (06/30/2025)</i>						

Activities Reviewed

Examiners determined the bank’s major product lines are home mortgage and small business loans. This conclusion considered the bank’s strategy and the number and volume of originations during the evaluation period.

Examiners analyzed MCB's 2022, 2023, and 2024 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR). MCB reported 202 loans totaling \$85.3 million in 2022, 310 loans totaling \$88.0 million in 2023, and 189 loans totaling \$68.8 million in 2024. Aggregate data and 2020 United States (U.S.) Census data provided a standard of comparison for home mortgage loans. Although examiners analyzed 2022 home mortgage lending performance, 2022 lending was similar to 2023 and 2024 performance; therefore, this evaluation does not present 2022 performance under the Geographic Distribution and Borrower Profile criteria. However, examiners presented the bank's 2022 lending activity under the Assessment Area Concentration criterion.

As an ISI, MCB is not required to collect or report small business loans and has chosen not to do so. Therefore, for the Lending Test, examiners sampled 47 small business loans totaling approximately \$9.3 million from the 2024 small business loan universe of 150 loans totaling approximately \$33.8 million. As the bank did not elect to report small business data, examiners did not use aggregate data as a standard of comparison. D&B 2024 data provided a standard of comparison for small business lending.

Examiners analyzed no other loan types such as small farm or consumer loans as they did not represent a major product line. Small farm loans represent a nominal percentage of the loan portfolio and MCB did not originate a small farm loan during the evaluation period. Consumer loans represent 0.3 percent of the portfolio, so an analysis would not materially affect conclusions.

When determining the overall conclusions, examiners assigned greater weight to home mortgage lending performance, given the bank's lending strategy and the number of home mortgage originations significantly exceeded the number of small business loans during the evaluation period. Although the loan portfolio as of September 30, 2025, reflects that commercial lending represents the greatest percentage at 48.7 percent, this was due to the merger. More specifically, GSB, a larger institution, was primarily a commercial lender. Although commercial lending represented the greatest percentage of the loan portfolio, for purposes of this evaluation and the scope period, examiners gave more weight to home mortgage lending in the overall conclusions.

For the Lending Test, examiners analyzed the number and dollar volume of home mortgage and small business loans. Although the tables throughout this evaluation present both the number and dollar volume of loans, examiners emphasized performance by number of loans, as it is a better indicator of the number of individuals and businesses served. For the Community Development Test, examiners reviewed community development loans, investments, and services, since the prior evaluation date of January 31, 2022 to the current evaluation date of December 8, 2025.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

MCB demonstrated reasonable performance under the Lending Test. The bank’s performance under the Assessment Area Concentration, Geographic Distribution, and Borrower Profile criteria support this conclusion.

Loan-to-Deposit Ratio

The Loan-to-Deposit (LTD) ratio is more than reasonable given the bank’s size, financial condition, and assessment area credit needs. The bank’s LTD ratio, calculated from Call Report data, averaged 103.6 percent over the past 14 calendar quarters from March 31, 2022, to September 30, 2025. The ratio ranged from a low of 93.2 percent as of March 31, 2022, to a high of 111.9 percent as of March 31, 2024. As shown in the following table, MCB maintained an average LTD ratio above that of comparable institutions. Examiners selected the comparable institutions based on their asset size, lending focus, and location.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 09/30/2025 (\$000s)	Average Net LTD Ratio (%)
Maine Community Bank	2,778,098	103.6
Kennebunk Savings Bank	1,968,109	86.0
Androscoggin Savings Bank	1,779,559	99.3
<i>Source: Reports of Condition and Income 03/31/2022 – 09/30/2025</i>		

Assessment Area Concentration

The bank originated a majority of home mortgage and small business loans, by number and dollar, within the combined assessment area. As the following table illustrates, home mortgage lending fluctuated during the evaluation period.

Lending Inside and Outside of the Combined Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Totals \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	148	73.3	54	26.7	202	54,472	63.9	30,824	36.1	85,296
2023	210	67.7	100	32.3	310	54,712	62.2	33,290	37.8	88,002
2024	126	66.7	63	33.3	189	39,600	57.6	29,154	42.4	68,754
Subtotal	484	69.0	217	31.0	701	148,784	61.5	93,268	38.5	242,052
Small Business	25	53.2	22	46.8	47	5,546	59.4	3,784	40.6	9,330
<i>Source: 2022, 2023, 2024 HMDA Data, Bank Data Due to rounding, totals may not equal 100.0%.</i>										

Geographic Distribution

The geographic distribution reflects excellent dispersion throughout the combined assessment area. Performance is consistent across the bank's assessment areas. Refer to individual assessment area sections for detailed discussion of the bank's performance.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the combined assessment area, reasonable penetration among individuals of different income levels and businesses of different sizes. Performance is consistent across the bank's assessment areas. Refer to individual assessment area sections for detailed discussion of the bank's performance.

Response to Complaints

The bank has not received any CRA-related complaints since the prior CRA evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

MCB demonstrates adequate responsiveness to the community development needs and opportunities within its combined assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the combined assessment area.

Community Development Loans

MCB originated 79 community development loans totaling approximately \$89.7 million during the evaluation period. Of the 79 community development loans, 25 loans totaling approximately \$31.2 million benefitted a broader statewide or regional area that includes the assessment area. The bank's total community development lending activity represents 7.7 percent of average total assets and 9.0 percent of average total loans and exceeds that of two similarly situated institutions. Similarly situated institutions maintained ratios of 1.4 percent and 1.8 percent, respectively of average total assets and 2.0 percent and 3.3 percent, respectively of average total loans.

Compared to the prior evaluation period, during which the bank originated 189 community development loans totaling approximately \$68.7 million, the bank's lending activity decreased by number and increased by dollar amount. However, during the prior evaluation, the bank originated 136 community development loans totaling approximately \$41.0 million through the SBA's Paycheck Protection Program, a special loan product SBA no longer offers.

The following tables detail the bank's qualified community development loans by year, purpose, and assessment area.

Community Development Lending Assessment Area: Combined										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	11	7,450	0	0	10	18,955	0	0	21	26,405
2023	5	8,263	0	0	10	8,582	4	7,924	19	24,769
2024	8	4,917	2	800	5	2,711	2	294	17	8,722
YTD 2025	10	5,795	2	680	10	23,373	0	0	22	29,848
Total	34	26,425	4	1,480	35	53,621	6	8,218	79	89,744

Source: Bank Data

Community Development Lending Assessment Area: Combined										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Portland-South Portland MSA	6	10,620	0	0	18	20,689	6	8,218	30	39,527
Lewiston-Auburn MSA	17	9,847	3	1,225	4	7,981	0	0	24	19,053
Statewide Activities	11	5,958	1	255	11	18,291	0	0	23	24,504
Regional Activities	0	0	0	0	2	6,660	0	0	2	6,660
Total	34	26,425	4	1,480	35	53,621	6	8,218	79	89,744

Source: Bank Data

The following are examples of community development loans that benefited the statewide and regional area:

- In 2022, MCB originated an \$8.8 million loan to build a 48-room hotel in Portland. The applicant and loan qualified for SBA financing, while promoting low- and moderate-income job creation.
- In 2025, MCB originated a \$255,000 loan to renovate a Maine Care-funded behavior health facility. This facility provides substance abuse recovery services to low- and moderate-income individuals.
- During the evaluation period, MCB originated nine SBA 504 loans totaling \$14.4 million statewide. The SBA 504 program offers small businesses financing, while promoting business growth and job creation.

Qualified Investments

The bank has 273 qualified community development investments totaling approximately \$15.2 million. Included in the qualified investments are 246 donations totaling approximately \$1.1 million. The dollar amount of qualified investments equates to 1.1 percent of average total assets and 12.7 percent of average total securities. The bank's community development investment

performance is in line with that of two similarly situated institutions, whose ratios were 1.4 and 1.8 percent of average total assets, respectively and .5 and 15.0 percent of average total securities, respectively.

Since the prior evaluation, the bank’s activity level increased by both number and dollar amount. At the prior evaluation, MCB made 177 qualified investments totaling approximately \$4.2 million. This total includes 12 equity investments totaling \$3.8 million and 165 donations totaling \$458,249.

The following tables detail the bank’s qualified investments by year, purpose, and assessment area.

Qualified Investments Assessment Area: Combined										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	9	2,450	0	0	6	1,130	0	0	15	3,580
2022	1	1,000	0	0	2	725	1	3,660	4	5,385
2023	0	0	0	0	2	800	0	0	2	800
2024	1	500	0	0	3	1,250	1	2,112	5	3,862
YTD 2025	1	500	0	0	0	0	0	0	1	500
Subtotal	12	4,450	0	0	13	3,905	2	5,772	27	14,127
Qualified Grants & Donations	10	53	223	867	10	135	3	18	246	1,073
Total	22	4,503	223	867	23	4,040	5	5,790	273	15,200

Source: Bank Data

Qualified Investments Assessment Area: Combined										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Portland-South Portland MSA	4	41	138	551	6	111	3	18	151	721
Lewiston-Auburn MSA	1	1	61	209	0	0	0	0	62	210
Statewide Activities	7	1,358	24	107	15	3,555	2	5,772	48	10,792
Regional Activities	10	3,103	0	0	2	374	0	0	12	3,477
Total	22	4,503	223	867	23	4,040	5	5,790	273	15,200

Source: Bank Data

Equity Investments

The following are examples of community development investments that benefited the statewide and regional area:

- **Housing New England Fund VI** - The bank continues to hold a \$500,000 investment. The Housing New England Fund VI provides equity to finance affordable housing in ME, New Hampshire, and Vermont.

- **Genesis Community Loan Fund (GCLF)** - In 2024, MCB invested \$1.25 million. The GCLF is a tax-exempt, non-profit Community Development Financial Institution (CDFI) that provides resources to projects that create affordable housing and community service facilities throughout ME for low- and moderate-income residents.
- **Dirigo Angel Fund II (Fund)** – In 2022, the bank invested \$93,387. A non-profit equity organization oversees the Fund. The Fund invests in ME-based entrepreneurial start-ups and ME-based woman and minority owned small businesses.

The following are examples of qualified donations that benefited the statewide and regional area.

- In 2023 and 2024, the bank donated to a non-profit organization that provides heating fuel assistance to low- and moderate-income individuals and local organizations that provide emergency fuel assistance to low- and moderate-income families throughout ME.
- In 2024, the bank donated to a non-profit that works to strengthen small family owned ME businesses using networking opportunities, technical consulting services, and financial education programs.
- In 2025, MCB donated to a non-profit organization, which provides community based anti-poverty and social services to low- and moderate-income individuals throughout ME. The organization provides programs such as pro-bono legal services, food distribution, and education.

Community Development Services

During the evaluation period, the bank provided 850 instances of financial education and technical assistance to local community organizations. During the prior evaluation, the bank collected service activities via hours served. As such, examiners were unable to compare activity levels.

The following tables detail the number of instances of community development services by year, purpose, and assessment area.

Community Development Services					
Assessment Area: Combined					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	9	130	11	0	150
2023	1	134	22	0	157
2024	4	104	42	0	150
YTD 2025	99	190	104	0	393
Total	113	558	179	0	850
<i>Source: Bank Data</i>					

Community Development Services Assessment Area: Combined					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Portland-South Portland MSA	30	161	131	0	322
Lewiston-Auburn MSA	0	348	27	0	375
Statewide Activities	83	49	21	0	153
Regional Activities	0	0	0	0	0
Total	113	558	179	0	850
<i>Source: Bank Data</i>					

The following are examples of qualified community development services that benefited the statewide and regional area:

- **Maine Justice Foundation (Foundation):** A bank officer served as a Director and committee member. The Foundation provides funding to civil legal aid programs to ensure low- and moderate-income individuals have access to affordable legal representation in civil and family law situations.
- **The Opportunity Alliance (Alliance):** An executive served on the organization’s Board. The Alliance provides community services to low- and moderate-income families and individuals in ME. These services include affordable childcare, early childhood education, heating assistance, mental health and substance abuse treatment, and food stability programs.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the bank’s compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

PORTLAND-SOUTH PORTLAND, ME MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN PORTLAND-SOUTH PORTLAND, ME MSA

The Portland-South Portland MSA represents 68.3 percent of the total number of census tracts in the bank’s combined assessment area. Branches are in Biddeford (2), Brunswick, Kennebunk, Scarborough (2), Waterboro, Westbrook, and Windham. There are no branches in the low-income census tract. The Biddeford and Brunswick branches are in moderate-income census tracts.

Economic and Demographic Data

The Portland-South Portland MSA assessment area consists of 69 census tracts throughout portions of Cumberland and York counties. These census tracts reflect the following income designations:

- 1 low-income census tract,
- 12 moderate-income census tracts,
- 42 middle-income census tracts, and
- 14 upper-income census tracts

The low-income tract is in Biddeford. The moderate-income census tracts are in Alfred, Biddeford (2), Brunswick (2), Lyman, Old Orchard Beach, Raymond, Saco, Waterboro/Lake Arrowhead, Wells, and Westbrook. The following table illustrates select demographic characteristics of the assessment area using the 2020 U.S. Census data.

Demographic Information of the Assessment Area						
Assessment Area: Portland-South Portland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	69	1.5	17.4	60.9	20.3	0.0
Population by Geography	258,764	0.9	16.4	59.5	23.2	0.0
Housing Units by Geography	126,551	0.8	18.7	59.2	21.4	0.0
Owner-Occupied Units by Geography	77,844	0.2	15.0	61.4	23.4	0.0
Occupied Rental Units by Geography	25,324	3.2	26.3	52.5	18.0	0.0
Vacant Units by Geography	23,383	0.2	22.5	59.0	18.4	0.0
Businesses by Geography	18,607	0.3	15.0	60.7	24.0	0.0
Farms by Geography	372	0.0	12.4	72.9	14.8	0.0
Family Distribution by Income Level	66,626	17.5	18.5	25.1	38.9	0.0
Household Distribution by Income Level	103,168	22.0	16.3	19.6	42.1	0.0
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$89,988	Median Housing Value		\$ 288,528	
			Median Gross Rent		\$1,086	
			Families Below Poverty Level		4.2%	
<i>Source: 2020 Census and 2024 D&B Data (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

The Portland-South Portland MSA assessment area also contains three Opportunity Zones (OZ). The OZs are in Brunswick, Saco, and Westbrook. The OZ Program provides incentives for investing in certain census tracts to encourage growth in low-income areas.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. As shown in the previous table, owner-occupancy rates in the low- and

moderate-income census tracts are low, limiting home mortgage lending opportunities in those tracts.

Examiners used the 2023 and 2024 FFIEC-updated median family income (MFI) levels to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the MFI ranges in the Portland-South Portland MSA assessment area in 2023 and 2024.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
Portland-South Portland MSA				
2023 (\$108,500)	<\$54,250	\$54,250 to <\$86,800	\$86,800 to <\$130,200	>=\$130,200
2024 (\$112,500)	<\$56,250	\$56,250 to <\$90,000	\$90,000 to <\$135,000	>=\$135,000
<i>Source: FFIEC</i>				

According to 2024 D&B data, 18,607 non-farm businesses operate in the assessment area. The following reflects gross annual revenues (GARs) for these businesses.

- 88.4 percent have \$1.0 million or less,
- 3.2 percent have more than \$1.0 million, and
- 8.4 percent have unknown revenues

Non-classifiable establishments represent the largest portion of businesses at 13.6 percent; followed by construction at 10.5 percent; and professional, scientific, and technical services at 9.9 percent. Additionally, 72.7 percent of businesses operate with four or fewer employees.

According to the U.S. Bureau of Labor Statistics, unemployment rates for Cumberland County and York County fluctuated during the evaluation period. County unemployment rates followed the same trend as the state and national trends. ME unemployment rates were consistently lower than the national unemployment rate.

Unemployment Rates			
Assessment Area: Portland-South Portland MSA			
Area	2022	2023	2024
	%	%	%
Cumberland County	2.3	2.1	2.5
York County	2.6	2.4	2.8
ME	2.9	2.6	3.1
National Average	3.7	3.7	4.0
<i>Source: U.S. Bureau of Labor Statistics</i>			

Competition

The Portland-South Portland MSA assessment area is competitive for financial services. According to the FDIC Deposit Market Share data as of June 30, 2024, 22 financial institutions operated 187 offices in Portland-South Portland MSA assessment area. Of these, MCB ranked 4th with 9.2 percent market share. TD Bank ranked 1st with 14.9 percent market share, followed by Northeast Bank with 12.7 percent market share and Bank of America with 10.1 percent market share.

The Portland-South Portland MSA assessment area is highly competitive for home mortgage lending. According to 2024 aggregate home mortgage lending data, 277 financial institutions originated 7,817 loans. Of these institutions, MCB ranked 29th with a 1.0 percent market share. Bangor Savings Bank ranked 1st with 6.9 percent, followed by United Wholesale Mortgage, LLC with 6.8 percent, and Town & Country Federal Credit Union with 4.9 percent market share.

MCB is not required to collect or report small business lending and elected not to do so. Aggregate data provides an indicator of competition and demand for small business loans in the assessment area. Aggregate small business lending data for 2024 shows that 93 lenders originated 14,903 small business loans in the Portland-South Portland MSA assessment area. American Express National Bank had the greatest market share, followed by, JPMorgan Chase Bank; Capital One, N.A.; Synchrony Bank; and Citibank, N.A. The top five lenders captured 58.4 percent of the market share. Please note that small business market share data is only available at the county level. The Portland-South Portland MSA assessment area does not include Cumberland County and York County in their entirety.

Community Contact

Examiners contacted a non-profit organization that operates in the Portland-South Portland MSA assessment area. The organization focuses on affordable housing and economic development. The contact stated that one of the area's primary challenges is a lack of affordable housing. The contact noted that the area has a strained workforce. The contact also explained that banks could assist by funding affordable housing development projects, offering flexible mortgages, and funding non-profits and community service programs for low-income populations.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, demographics, and economic data, examiners determined the primary credit needs are affordable home and small business loans. Furthermore, the assessment area demonstrates needs for affordable housing, community services to low- and moderate-income individuals, and economic development.

CONCLUSIONS ON PERFORMANCE CRITERIA IN PORTLAND-SOUTH PORTLAND, ME MSA

LENDING TEST

MCB demonstrated reasonable performance in the Portland-South Portland MSA assessment area. The bank's excellent performance under Geographic Distribution and reasonable performance under Borrower Profile criteria support this conclusion.

Geographic Distribution

The geographic distribution reflects excellent dispersion throughout the Portland-South Portland MSA assessment area. The bank's excellent home mortgage and good small business lending performance supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the Portland-South Portland MSA assessment area. As reflected in the following table, the bank's performance in the low-income census tract outperformed demographic data and aggregate performance in 2023. In 2024, lending activity increased in the low-income tract significantly exceeding demographics and the aggregate. Although the bank's 2024 lending in the moderate-income tracts declined from that in 2023, the bank's performance exceeded demographics and aggregate.

Geographic Distribution of Home Mortgage Loans Assessment Area: Portland-South Portland MSA						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2023	0.2	0.4	1	0.7	1,400	3.4
2024	0.2	0.5	5	6.2	1,427	5.2
Moderate						
2023	15.0	15.3	30	20.4	6,443	15.7
2024	15.0	14.3	13	16.1	3,767	13.8
Middle						
2023	61.4	63.0	93	63.3	24,799	60.5
2024	61.4	64.0	53	65.4	16,554	60.6
Upper						
2023	23.4	21.2	23	15.7	8,344	20.4
2024	23.4	21.2	10	12.4	5,573	20.4
NA						
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Total						
2023	100.0	100.0	147	100.0	40,986	100.0
2024	100.0	100.0	81	100.0	27,321	100.0
<i>Source: 2020 Census; Bank Data; 2024, 2023, HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects excellent dispersion throughout the Portland-South Portland MSA assessment area. As reflected in the following table, the bank did not originate any loans in the low-income tract. However, only 0.3 percent of businesses in the assessment area are in this census tract, presenting limited opportunities. In the moderate-income census tracts, the bank's performance significantly outperformed demographics.

Geographic Distribution of Small Business Loans Assessment Area: Portland-South Portland MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	0.3	0	0.0	0	0.0
Moderate	15.0	4	25.0	465	11.6
Middle	60.7	11	68.8	3,511	87.4
Upper	24.0	1	6.3	40	1.0
NA	0.0	0	0.0	0	0.0
Total	100.0	16	100.0	4,016	100.0
<i>Source: 2024 D&B Data; Bank Data</i> <i>Due to rounding, totals may not equal 100.0%.</i>					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the Portland-South Portland, MSA assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. The bank’s reasonable performance in home mortgage and small business lending supports this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. As reflected in the following table, the bank’s lending to low-income borrowers fell below demographic data and aggregate performance in 2023 and 2024. However, low-income families in the Portland-South Portland MSA assessment area, earning less than \$54,250 and \$56,250, may have difficulty qualifying for a mortgage under conventional underwriting standards. Additionally, 4.2 percent of families in this assessment area are below the poverty level, a subset of the low-income category. These factors help explain the disparity between lending to low-income families and the percentage of low-income families. The bank’s lending to moderate-income borrowers also fell below demographics and aggregate for both years.

According to 2024 Market Share Data, 24 lenders made 35 loans to low-income borrowers in the Portland-South Portland MSA assessment area. MCB ranked 1st overall among low-income borrowers with a 14.3 percent market share. Additionally, 143 lenders generated 1,121 loans to moderate-income individuals in the Portland-South Portland MSA assessment area. The bank ranked 25th overall and 5th among community banks with a 1.6 percent market share.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Portland-South Portland MSA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2023	17.5	6.2	5	3.4	284	0.7
2024	17.5	6.2	3	3.7	475	1.7
Moderate						
2023	18.5	18.5	19	12.9	2,166	5.3
2024	18.5	16.6	10	12.4	871	3.2
Middle						
2023	25.1	24.9	31	21.1	4,832	11.8
2024	25.1	25.0	12	14.8	3,446	12.6
Upper						
2023	38.9	40.2	84	57.1	23,316	56.9
2024	38.9	41.0	43	53.1	17,414	63.7
NA						
2023	0.0	10.3	8	5.4	10,388	25.4
2024	0.0	11.3	13	16.1	5,115	18.7
Total						
2023	100.0	100.0	147	100.0	40,986	100.0
2024	100.0	100.0	81	100.0	27,321	100.0
<i>Source: 2020 Census; Bank Data; 2024, 2023, HMDA Aggregate Data</i>						
<i>Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects reasonable penetration of loans to businesses with GARs of \$1.0 million or less. As shown in the following table, the bank originated a significant majority of its small business loans to businesses with GARs of \$1 million or less but fell below demographics.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Portland-South Portland MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	88.4	12	75.0	2,709	67.5
> \$1,000,000	3.2	4	25.0	1,307	32.5
Revenue Not Available	8.5	0	0.0	0	0.0
Total	100.0	16	100.0	4,016	100.0
<i>Source: 2024 D&B Data; Bank Data</i>					
<i>Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MCB demonstrated adequate responsiveness to the community development needs of the Portland-South Portland MSA assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for community development in the institution’s assessment area.

Community Development Loans

MCB originated 30 community development loans totaling approximately \$39.5million. This represents a decline since the prior evaluation. However, of the 101 community development loans totaling \$24.3 million that the bank originated during the prior examination, 73 loans totaling approximately \$14.6 million were PPP loans.

The following table details the bank’s qualified community loans by year and purpose for this assessment area.

Community Development Lending Assessment Area: Portland–South Portland MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	1	3,322	0	0	6	3,766	0	0	7	7,088
2023	1	5,312	0	0	6	2,335	4	7,923	11	15,570
2024	1	372	0	0	0	0	2	294	3	666
YTD 2025	3	1,615	0	0	6	14,588	0	0	9	16,203
Total	6	10,621	0	0	18	20,689	6	8,217	30	39,527

Source: Bank Data

The following are examples of community development loans that benefited the Portland-South Portland MSA assessment area:

- In 2022, MCB originated a \$3.3 million Naturally Occurring Affordable Housing Preservation Loan for a 20-unit affordable housing complex located in a moderate-census tract in Brunswick. The MSHA identified a critical shortage of housing supply, especially affordable housing in Cumberland County.
- In 2022, MCB originated a \$1 million SBA 504 loan to facilitate the purchase and upgrade of a larger location for a local small business in Scarborough. This loan facilitated the combined retention and creation of 27 jobs in the area.
- In 2025, MCB originated a \$500,000 line of credit to a non-profit affordable housing organization. Proceeds will be used to build and acquire properties and fund general working capital needs.

Qualified Investments

MCB made 151 qualified donations totaling \$721,000. During the prior evaluation, MCB retained three investments totaling \$1.4 million and made 90 donations totaling \$232,156. The current donation level represents a significant increase.

The following table details the bank’s qualified community development donations by year and purpose.

Community Development Donations Assessment Area: Portland-South Portland MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	0	0	30	112	0	0	0	0	30	112
2023	1	5	21	69	0	0	1	6	23	80
2024	0	0	35	134	1	2	1	6	37	142
YTD 2025	3	36	52	236	5	109	1	6	61	387
Total	4	41	138	551	6	111	3	18	151	721
<i>Source: Bank Data</i>										

The following are examples of qualified donations that benefited the Portland-South Portland MSA assessment area.

- In 2022, 2023, 2024, and 2025, MCB donated to a non-profit organization that provides low- and moderate-income individuals with programs to address food and housing insecurities, childcare, and mental health services.
- In 2022, 2023, 2024, and 2025, MCB donated to a non-profit organization that provides low- and moderate-income individuals and families with mental health services including addiction treatment and talk therapy.
- In 2025, MCB donated to a non-profit organization that provides affordable housing and low-cost repairs to low-income individuals.

Community Development Services

During the evaluation period, the bank provided 327 instances of financial education or technical assistance in the Portland-South Portland MSA assessment area. The following table details the community development services by year and purpose.

Community Development Services Assessment Area: Portland-South Portland MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	5	19	1	0	25
2023	1	9	13	0	23
2024	0	11	42	0	53
YTD 2025	24	122	75	0	221
Total	30	161	131	0	322
<i>Source: Bank Data</i>					

The following are examples of community development services that benefited the Portland-South Portland MSA assessment area:

- **Prosperity ME** – Two senior vice presidents serve on the Board. Prosperity ME is a non-profit organization which provides low- and moderate-income immigrant and refugee residents with financial, career, and housing services.
- **Westbrook Development Corporation (Corporation)** – A senior vice president serves on the Board. The Corporation is a non-profit organization that develops affordable housing to assist low-income individuals and families.

The Biddeford and Brunswick branches are in moderate-income census tracts. These two branch locations assist in creating convenient financial access for low- and moderate-income individuals.

LEWISTON-AUBURN, ME MSA– Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN LEWISTON-AUBURN, ME MSA

The Lewiston-Auburn MSA assessment area consists of all of Androscoggin County and represents 31.7 percent of the total number of census tracts in the bank’s combined assessment area. MCB operates two full-service branches in this assessment area. Both branches are in low-income census tracts. This assessment area also contains two designated OZs in Auburn and Lewiston.

Economic and Demographic Data

The Lewiston-Auburn MSA assessment area consists of 32 census tracts that reflect the following income designations:

- 4 low-income census tracts,
- 7 moderate-income census tracts,
- 16 middle-income census tracts,
- 4 upper-income census tracts, and

- 1 tract with no income designation

The four low-income tracts are in Auburn and Lewiston (3). The seven moderate-income census tracts are in Auburn (2), Lewiston (4), and Livermore Falls. The following table illustrates select demographic characteristics of the Lewiston-Auburn MSA assessment area using 2020 U.S. Census data.

Demographic Information of the Assessment Area						
Assessment Area: Lewiston-Auburn MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	32	12.5	21.9	50.0	12.5	3.1
Population by Geography	111,139	7.5	17.2	58.3	14.9	2.1
Housing Units by Geography	50,053	7.8	17.4	59.4	14.2	1.2
Owner-Occupied Units by Geography	29,796	0.6	13.2	68.3	17.4	0.5
Occupied Rental Units by Geography	16,110	19.6	25.5	42.8	9.6	2.5
Vacant Units by Geography	4,147	13.7	16.1	60.3	9.2	0.7
Businesses by Geography	8,473	17.6	17.4	45.5	18.8	0.7
Farms by Geography	193	9.3	9.8	63.7	17.1	0.0
Family Distribution by Income Level	27,756	19.6	18.6	21.9	39.9	0.0
Household Distribution by Income Level	45,906	23.6	17.0	17.4	42.0	0.0
Median Family Income MSA - 30340 Lewiston-Auburn, ME MSA		\$70,817	Median Housing Value		\$ 157,177	
			Median Gross Rent		\$765	
			Families Below Poverty Level		7.0%	
<i>Source: 2020 Census and 2024 D&B Data (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. As shown in the previous table, owner-occupancy rates in the low- and moderate-income census tracts are low, limiting the bank's home mortgage lending opportunities in those tracts.

Examiners used the 2023 and 2024 FFIEC updated median family income levels to analyze home mortgage loans. The following table represents low-, moderate-, middle-, and upper-income categories for the Lewiston-Auburn MSA.

Median Family Income Ranges Lewiston-Auburn MSA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2023 (\$87,800)	<\$43,900	\$43,900 to <\$70,240	\$70,240 to <\$105,360	≥\$105,360
2024 (\$77,500)	<\$38,750	\$38,750 to <\$62,000	\$62,000 to <\$93,000	≥\$93,000
<i>Source: FFIEC</i>				

According to 2024 D&B data, 8,473 non-farm businesses operate in the assessment area. The following reflects GARs for these businesses.

- 85.0 percent have \$1.0 million or less,
- 4.7 percent have more than \$1.0 million, and
- 10.3 percent have unknown revenues

Of all businesses in the assessment area, non-classifiable establishments represent the largest portion of businesses at 14.4 percent, followed by health care and social assistance at 10.0 percent, and other services (except public administration) at 9.7 percent. Additionally, 70.7 percent of businesses operate with four or fewer employees.

Unemployment rates for Androscoggin County followed the state unemployment trend and fluctuated during the evaluation period. ME unemployment rates are consistently lower than the national unemployment rate.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Androscoggin County	2.9	2.7	3.2
ME	2.9	2.6	3.1
National Average	3.7	3.7	4.0
<i>Source: US Bureau of Labor Statistics</i>			

Competition

The Lewiston-Auburn MSA assessment area is moderately competitive for financial services. According to the FDIC Deposit Market Share data as of June 30, 2024, nine financial institutions operated 20 offices in Lewiston-Auburn MSA assessment area. Of these, MCB ranked 3rd with 11.8 market share. Androscoggin Savings Bank ranked 1st with 35.0 percent market share, followed by TD Bank with 18.8 percent market share.

The Lewiston-Auburn MSA assessment area is moderately competitive for home mortgage lending. According to 2024 aggregate home mortgage lending data, 165 financial institutions originated 2,803 loans. Of these institutions, MCB ranked 17th with a 1.6 percent market share. Guild Mortgage Company LLC ranked 1st with 9.1 percent market share; followed by CMG Mortgage,

Inc. with 5.8 percent market share; and United Wholesale Mortgage LLC with 5.6 percent market share.

MCB is not required to collect or report small business lending data. Aggregate data provides an indicator of competition and demand for small business loans in the assessment area. Aggregate small business lending data for 2024 shows that 64 lenders originated 1,971 small business loans in the Lewiston-Auburn MSA assessment area. American Express National Bank had the greatest market share, followed by JPMorgan Chase Bank; Capital One, N.A.; Citibank, N.A.; and The Camden National Bank. The top five lenders captured 52.1 percent of the market share.

Community Contact

Examiners contacted an economic development corporation. The contact stated that there is a significant need for affordable rental housing, particularly multi-family housing for low- and moderate-income individuals. The contact also noted needs for flexible financing and grant programs for small businesses. Further, the community contact stated there is a need for vocational training.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, the community contact, and discussions with bank management, examiners determined that affordable housing, small business technical assistance, and job training represents primary community development needs. Affordable loans to purchase homes and construct multi-family properties are primary credit needs in the Lewiston-Auburn MSA assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN LEWISTON-AUBURN, ME MSA

LENDING TEST

MCB demonstrated reasonable performance in the Lewiston-Auburn MSA assessment area. The bank's excellent performance under Geographic Distribution and reasonable performance under Borrower Profile criteria support this conclusion.

Geographic Distribution

The geographic distribution reflects excellent dispersion throughout the Lewiston-Auburn MSA assessment area. The bank's excellent performance in home mortgage lending supports this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans reflects excellent dispersion in the Lewiston-Auburn MSA assessment area. As reflected in the following table, the bank's performance in low-income census

tracts was above demographic data and aggregate performance in 2023 and 2024. Similarly, performance in moderate-income census tracts was above demographic data and aggregate performance in 2023. Although the bank’s 2024 performance was below aggregate performance, it was above demographic data.

Geographic Distribution of Home Mortgage Loans Assessment Area: Lewiston-Auburn MSA						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2023	0.6	3.0	2	3.2	768	5.6
2024	0.6	2.6	3	6.7	2,840	23.1
Moderate						
2023	13.2	16.9	12	19.1	2,582	18.8
2024	13.2	17.6	7	15.6	1,942	15.8
Middle						
2023	68.3	64.7	39	61.9	7,774	56.6
2024	68.3	62.8	28	62.2	5,823	47.4
Upper						
2023	17.4	14.9	9	14.3	1,938	14.1
2024	17.4	16.6	6	13.3	1,370	11.2
NA						
2023	0.5	0.6	1	1.6	664	4.8
2024	0.5	0.5	1	2.2	304	2.5
Total						
2023	100.0	100.0	63	100.0	13,726	100.0
2024	100.0	100.0	45	100.0	12,279	100.0
<i>Source: 2020 Census; Imported Bank Data; 2024, 2023, HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of loans reflects reasonable dispersion throughout the Lewiston-Auburn MSA assessment area. In low-income census tracts, the bank’s lending was less than demographics. Conversely, in the moderate-income census tracts, MCB performance was significantly above demographics.

Geographic Distribution of Small Business Loans Assessment Area: Lewiston-Auburn MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	17.6	1	11.1	40	2.6
Moderate	17.4	3	33.3	240	15.7
Middle	45.5	2	22.2	600	39.2
Upper	18.8	3	33.3	650	42.5
NA	0.7	0	0.0	0	0.0
Total	100.0	9	100.0	1,530	100.0
<i>Source: 2024 D&B Data; Bank Data</i> <i>Due to rounding, totals may not equal 100.0%.</i>					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. The bank’s reasonable performance within both home mortgage and small business lending supports this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration throughout the Lewiston-Auburn MSA assessment area. As reflected in the following table, the bank’s lending to low-income borrowers fell below demographic data and aggregate performance in 2023 and 2024. However, low-income families in the Lewiston-Auburn MSA assessment area, earning less than \$42,900 and \$38,750, may have difficulty qualifying for a mortgage under conventional underwriting standards. Additionally, 7.0 percent of families in this assessment area are below the poverty level, a subset of the low-income category. These factors help explain the disparity between lending to low-income families and the percentage of low-income families. The bank’s lending to moderate-income borrowers also fell below demographics and aggregate for both years.

According to 2024 Market Share Data, 26 lenders originated 73 loans to low-income borrowers in the Lewiston-Auburn MSA assessment area. MCB ranked 8th overall and 4th among community banks in lending to low-income borrowers representing a 4.1 percent market share. The top five lenders hold a combined 50.7 percent market share.

Additionally, 90 lenders originated 492 loans to moderate-income borrowers. The bank ranked 18th overall and 3rd among community banks with moderate-income borrowers in 2024 representing a 1.4 percent market share. The top five lenders are national lending institutions holding a 34.6 percent market share.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Lewiston-Auburn MSA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2023	19.6	5.3	1	1.6	30	0.2
2024	19.6	3.2	1	2.2	20	0.2
Moderate						
2023	18.6	21.3	4	6.4	378	2.8
2024	18.6	11.3	3	6.7	335	2.7
Middle						
2023	21.9	26.0	12	19.1	1,309	9.5
2024	21.9	25.4	6	13.3	892	7.3
Upper						
2023	39.9	30.0	28	44.4	6,308	46.0
2024	39.9	41.0	22	48.9	5,129	41.8
NA						
2023	0.0	17.5	18	28.6	5,701	41.5
2024	0.0	19.1	13	28.9	5,903	48.1
Total						
2023	100.0	100.0	63	100.0	13,726	100.0
2024	100.0	100.0	45	100.0	12,279	100.0
<i>Source: 2020 Census; Imported Bank Data; 2024, 2023, HMDA Aggregate Data</i>						
<i>Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects reasonable penetration of loans to businesses with GARs of \$1.0 million or less. Since the bank is not a CRA reporter, examiners do not directly compare its performance to aggregate data. Examiners reviewed demographics to analyze the bank's opportunity to lend to small businesses in the assessment area. Leading national banks, including credit card banks, offer a wider variety of lending products with flexible underwriting standards and hold most of the market share for small business lending. Despite the competition, MCB made most of its loans to small businesses.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Lewiston-Auburn MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	85.0	5	55.6	840	54.9
> \$1,000,000	4.7	4	44.4	690	45.1
Revenue Not Available	10.3	0	0.0	0	0.0
Total	100.0	9	100.0	1,530	100.0
<i>Source: 2024 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MCB demonstrated adequate responsiveness to the community development needs of the Lewiston–Auburn MSA assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for community development in the institution’s assessment area.

Community Development Loans

MCB originated 24 loans totaling \$19.1 million in the Lewiston-Auburn MSA assessment area. This represents a decline since the prior evaluation. However, of the 82 community development loans totaling \$38.8 million that the bank originated during the prior examination, 62 loans totaling approximately \$24.4 million were PPP loans. The following table details the bank’s qualified community development loans by year and purpose.

Community Development Lending Assessment Area: Lewiston-Auburn MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	6	2,755	0	0	0	0	0	0	6	2,755
2023	2	824	0	0	2	5,856	0	0	4	6,680
2024	5	3,559	2	800	0	0	0	0	7	4,359
YTD 2025	4	2,709	1	425	2	2,125	0	0	7	5,259
Total	17	9,847	3	1,225	4	7,981	0	0	24	19,053
<i>Source: Bank Data</i>										

The following are examples of community development loans that benefited the Lewiston-Auburn MSA assessment area:

- In 2023, MCB originated two SBA 504 loans totaling \$5.9 million. Funds were used to purchase two hotels in Auburn. The hotels provide permanent jobs to low- and moderate-income residents.

- In 2024, MCB refinanced four mortgages for \$1.4 million to an organization that builds and manages affordable housing. The four rental properties are in Lewiston. MCB is responsive to needs for affordable housing in the assessment area.

Qualified Investments

MCB made 62 qualified donations totaling \$210,366 in the Lewiston-Auburn MSA assessment area. The bank’s activity level is less than that during the previous evaluation. During that evaluation, MCB made 69 qualified investments totaling approximately \$1.0 million in the Lewiston-Auburn MSA assessment area. The investments consisted of two prior period investments totaling \$850,000 and 67 donations totaling \$191,269. The following table details the bank’s qualified community development donations by year and purpose.

Community Development Donations Assessment Area: Lewiston-Auburn MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	0	0	16	36	0	0	0	0	16	36
2023	0	0	10	33	0	0	0	0	10	33
2024	1	1	19	61	0	0	0	0	20	62
YTD 2025	0	0	16	79	0	0	0	0	16	79
Total	1	1	61	209	0	0	0	0	62	210
<i>Source: Bank Data</i>										

The following are examples of qualified donations that benefitted the Lewiston–Auburn MSA assessment area:

- In 2025, MCB donated to a non-profit organization that provides services for low- and moderate-income individuals.
- In 2024, MCB donated to a non-profit organization that coordinates health initiatives and education programs for low-income individuals and families.
- In 2022, MCB donated to a non-profit organization that currently operates the only shelter service for domestic violence victims in Androscoggin County. The programs provide counseling, support, financial education, and other crucial community services.

Community Development Services

During the evaluation period, employees provided 375 instances of technical assistance or financial education in the Lewiston-Auburn MSA assessment area. The following table details the community development services by year and purpose.

Community Development Services					
Assessment Area: Lewiston-Auburn MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	0	111	5	0	116
2023	0	117	8	0	125
2024	0	80	0	0	80
YTD 2025	0	40	14	0	54
Total	0	348	27	0	375
<i>Source: Bank Data</i>					

The following are examples of community development services that benefitted the Lewiston-Auburn assessment area.

- ***Andwell Health Partners*** – A senior vice president serves on the Board. The organization provides services to patients regardless of ability to pay and primarily serves low- and moderate-income individuals.
- ***Tree Street Youth*** – A vice president serves on the Board. This non-profit organization provides services and support youth through afterschool and summer programs, leadership programs, and professional internships. The organization is strategically located on the walking route to the elementary, middle, and high schools in one of the state's most socio economically challenged communities. The majority of those served are low- and moderate-income individuals.
- ***Lewiston Auburn Economic Growth Council*** (Council) – A vice president serves on the Board. The Council serves start-up and expanding small businesses in Lewiston and Auburn. The organization provides small businesses with business development opportunities, OZ investment information, technical assistance, site searches, and financing.

Both branches are in low-income census tracts. These two branch locations assist in creating convenient financial access for low- and moderate-income individuals.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the prior and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA aids SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.