



PUBLIC DISCLOSURE

April 20, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CCFBank National Association
Charter Number: 25088

219 Fairfax Street
Altoona, WI 54720

Office of the Comptroller of the Currency

222 S 9th Street, Suite 800
Minneapolis, MN 55402

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 CCFBank National Association (CCFBank) respect to the Lending, Investment, and Service Tests:

Performance Levels	CCF Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
Low Satisfactory			
Needs to Improve		X	
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:

- CCFBank's Lending Test performance is excellent. The bank has excellent performance in the Minneapolis-St Paul-Bloomington, MN-WI Multistate Metropolitan Statistical Area (Minneapolis MMSA) and state of Wisconsin and adequate performance in the state of Minnesota. Performance in Wisconsin received the most weight given Wisconsin represented the bank's largest portion of deposits, loans, and branches.
- CCFBank's Investment Test performance needs to improve. CCFBank has poor performance in Wisconsin, good performance in Minnesota, and very poor performance in the Minneapolis MMSA. Performance in Wisconsin received the most weight.
- CCFBank's Service Test performance is excellent. CCFBank has excellent performance in each rating area, which included the Minneapolis MMSA and states of Wisconsin and Minnesota.

In addition to activities at the state and MMSA level, we considered the following activities at the bank-wide level:

- CCFBank uses flexible home loan programs targeted to low-and moderate-income (LMI) individuals. CCFBank originates loans through Freddie Mac's HomeReady, Home Possible, and HomeOne programs, which are low down payment and flexible funding mortgage products designed for LMI borrowers. Additionally, the bank originates loans through the United States Department of Agriculture (USDA) Rural Housing, which is for buying, building, and repairing homes for LMI borrowers. CCFBank also originates loans through the Minnesota Housing Finance Agency (MHFA), which provides loans for buying and repairing homes to LMI borrowers and first-time homebuyers. Loans in these programs made during the evaluation period are included in the bank's home mortgage lending activity under the retail Lending Test.

- CCFBank uses flexible business loans targeted to small businesses through the Small Business Administration (SBA).
- CCFBank offers alternative delivery systems that are available to all individuals and geographies including mobile banking, online banking, telephone banking, and free automated teller machine (ATM) usage with AllianceOne and MoneyPass. Online and mobile banking allows consumer customers to monitor their credit history through CreditSense in the online/mobile banking platforms. The service also provides credit coaching and ways to improve credit scores. Additionally, CCFBank offers online applications for checking and savings accounts. Customers also can apply for mortgage and consumer loans online. Integration with DocuSign allows customers to receive and acknowledge loan disclosures or open a checking/savings account without going to a bank location.
- CCFBank has an outstanding prior period investment of \$1.82 million in a Community Development Financial Institution that lends in multiple states, including Minnesota and Wisconsin. This investment qualifies at the bank level since it benefits a broader regional area that includes all the bank's rating areas.

Lending in Assessment Area

A high percentage of the bank's loans are in its assessment areas (AA). The bank originated and purchased 73.09 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	661	75.03	220	24.97	881	189,257	63.67	107,978	36.66	297,235
Small Business	713	76.58	218	23.42	931	121,314	61.27	76,681	38.73	197,995
Small Farm	275	61.94	169	38.06	444	39,619	56.90	30,011	43.10	69,630
Total	1,649	73.09	607	26.91	2,256	350,190	62.00	214,670	38.00	564,860
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

CCFBank is a nationally chartered interstate bank headquartered in Altoona, Wisconsin. CCFBank is a full-service financial institution offering traditional banking services to businesses, farmers, and consumers. As of December 31, 2024, CCFBank operated 22 full-service locations in Minnesota and Wisconsin. CCFBank did not own or operate any deposit-taking ATMs. During the evaluation period, CCFBank opened one branch and closed three branches. Refer to the Description of Operations in each of the MMSA and state sections for information regarding the branches by rating area and AA.

As of December 31, 2024, CCFBank had \$1.75 billion in total assets with total loans and leases comprising 78.45 percent of assets. The leverage ratio was 11.91 percent with \$207.75 million in tier one capital.

Citizens Community Bancorp, Inc. is the parent company and wholly owns CCFBank. The holding company owns two additional subsidiaries, CCF CMEC Investment Fund, LLC, and CCF RLARC Investment Fund, LLC. No affiliate activities were considered in this performance evaluation.

For the purposes of this examination, CCFBank operated in six AAs across three rating areas. AAs included the Minneapolis MMSA, Mankato Metropolitan Statistical Area (MSA), MN Non-MSA, Eau Claire MSA, La Crosse MSA, and WI Non-MSA. Rating areas included Minneapolis MMSA, Minnesota, and Wisconsin.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. CCFBank's CRA performance was rated Satisfactory in the last Performance Evaluation dated March 6, 2023.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated small loans to businesses and farms, home mortgage loans, community development (CD) loans, qualified investments, and CD and retail services from January 1, 2022, through December 31, 2024 (the evaluation period). Examiners did not consider consumer loans in this evaluation as consumer lending was not a substantial product, and management did not request consideration.

Lending Test

Examiners used home mortgage loan data reported by CCFBank in their 2022-2024 Home Mortgage Disclosure Act (HMDA) loan application registers (LAR) and small loans to businesses and farms data reported in the bank's 2022-2024 CRA LAR. In preparation for this evaluation, examiners completed a separate data integrity review and confirmed the data was accurate and reliable.

Examiners gave equal weight to geographic and borrower distribution components of the Lending Test. The Lending Test also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex or responsive to AA needs.

Investment Test

Examiners reviewed the bank's donations, grants, and investments made during the evaluation period and determined which qualified as CD.

Service Test

Examiners reviewed the bank's listing of service activities provided during the evaluation period and determined which qualified as CD. Examiners also considered the delivery systems, including branch hours and services, and branch distribution by geography.

Selection of Areas for Full-Scope Review

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

Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of multistate and state ratings. The rating for the State of Wisconsin received the most weight in determining overall ratings. The State of Minnesota received the next highest weight, and the Minneapolis MMSA received the least weight. Rating area weight was determined based on the bank’s deposit volume, branch presence, and loan volume in each rating area. Wisconsin represented 75.44 percent of deposits, 78.23 percent of loans originated and purchased, and 63.64 percent of branches.

The MMSA rating area has a single AA and the MMSA ratings are based on performance in that AA. The state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the “Scope” section under each MMSA and 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) (March 29, 2024) in determining a national bank’s or federal savings association’s (collectively, bank’s) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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.

Multistate Metropolitan Statistical Area Rating

Minneapolis-St Paul-Bloomington, MN-WI

CRA rating for the Minneapolis MMSA: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Substantial Noncompliance

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans to businesses and farms of different sizes and individuals of different income levels is excellent.
- The bank is a leader in originating CD loans.
- The geographic distribution of loans throughout CTs of different income levels is good.
- Lending levels reflect adequate responsiveness to credit needs in the AA.
- The bank made few CD investments and demonstrates poor responsiveness to the needs of the AA.
- Employees provided an excellent level of CD services to qualified organizations.
- The bank's service delivery systems are reasonably accessible to geographies of different income levels.

Description of Institution's Operations in Minneapolis MMSA

The Minneapolis MMSA represented one rating area and one AA. The Minneapolis MMSA consisted of Washington County in Minnesota and Pierce County in Wisconsin. CCFBank operated two full-service branches in the AA. The branches were located in Oakdale, Minnesota, and Ellsworth, Wisconsin. The Minneapolis MMSA was the smallest rating area for the bank accounting for 5.59 percent of deposits, 9.09 percent of branches, and 5.09 percent of loans made during the evaluation period by number. CCFBank did not open or close any branches or ATMs in the AA during the evaluation period.

CCFBank's primary lending focus in the Minneapolis MMSA was home mortgage loans. Home mortgage loans by number accounted for 45.24 percent of loans in the Minneapolis MMSA. Business and farm loans followed and accounted for 33.33 percent and 21.43 percent of loans by number, respectively. The 2024 FDIC Deposit Market Share Report indicated CCFBank ranked 20th among 30 deposit-taking institutions in the Washington and Pierce Counties, with a market share of 1.18 percent. The top five competitors by market share were Wells Fargo, U.S. Bank, Lake Elmo Bank, Platinum Bank, and The Huntington National Bank with a combined market share of 55.26 percent.

As part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the AA. One contact worked for an organization in Saint Paul, Minnesota that supports communities and businesses by providing essential services and infrastructure such as metropolitan transit, wastewater treatment, regional parks, and affordable housing. The contact identified a continued need for small business credit and affordable housing given the high-rate environment. The contact identified opportunities for institutions to provide CD through community services and lending. The contact noted community banks in the area like to reinvest into the community. Another contact worked for a nonprofit CD organization committed to expanding wealth

and resources of neighborhoods through housing and economic development initiatives in Minneapolis, Minnesota. The contact identified lending standards, regulatory limits, and credit education as challenges faced by local businesses and consumers. The contact indicated that community banks have opportunities to get involved with small business lending and identified small business loans as the primary credit need in the area. In addition, the contact noted that local lenders, especially SBA lenders, have been responsive in helping to meet the credit needs of the area.

The following table provides information on the demographic characteristics of the Minneapolis MMSA during the evaluation period.

Assessment Area - Minneapolis MMSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	67	0.00	11.94	55.22	29.85	2.99
Population by Geography	309,780	0.00	10.11	59.40	29.87	0.61
Housing Units by Geography	116,438	0.00	11.81	60.74	27.45	0.00
Owner-Occupied Housing by Geography	89,630	0.00	10.04	59.77	30.19	0.00
Occupied Rental Units by Geography	22,022	0.00	18.54	65.83	15.63	0.00
Vacant Units by Geography	4,786	0.00	13.98	55.41	30.61	0.00
Businesses by Geography	11,539	0.00	9.41	60.81	29.73	0.04
Farms by Geography	594	0.00	14.65	58.59	26.77	0.00
Family Distribution by Income Level	78,922	14.80	18.10	23.79	43.31	0.00
Household Distribution by Income Level	111,652	17.23	16.02	19.74	47.01	0.00
Unemployment rate (%)	3.08	0.00	4.00	3.10	2.71	0.00
Households Below Poverty Level (%)	5.08	0.00	8.88	5.37	2.81	0.00
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)		\$103,977	Median Housing Value			\$289,300
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2024		\$123,700	Median Gross Rent			\$1,212
			Families Below Poverty Level			3.06
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Minneapolis MMSA

The Minneapolis MMSA received a full-scope review. Examiners analyzed home mortgage loans and small loans to businesses and farms to arrive at Lending Test conclusions. Home mortgage loans represented the largest proportion of lending by number and dollar volume; therefore, home mortgage loans received the most weight when determining Lending Test conclusions. The geographic distribution conclusion was based solely on performance in moderate-income CTs given there were no low-income CTs in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNEAPOLIS MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Minneapolis MMSA is excellent.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Table 3: Lending Activity							2022 - 2024	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Minneapolis MMSA	38	28	18	1	0	85	100.00	1000.00
Total	38	28	18	1	0	85	100.00	100.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Minneapolis MMSA	14,842	4,241	2,519	5,500	0	27,102	100.00	100.00
Total	14,842	4,241	2,519	5,500	0	27,102	100.00	100.00
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

CCFBank's lending market share in the Minneapolis MMSA is adequate compared to its deposit share. The 2024 FDIC Deposit Market Share report indicated CCFBank ranked 20th with a market share of 1.18 percent.

Home mortgage lending activity is adequate. Aggregate home mortgage loan data for 2024 indicated CCFBank ranked 110th among 345 lenders with a market share of 0.12 percent. CCFBank's home mortgage lending share was significantly lower than its deposit share; however, positive consideration was given to performance given the significantly high number of mortgage lenders in the AA. The top five lenders captured 23.54 percent of the home mortgage market.

Small business lending activity is adequate. Aggregate small business loan data for 2024 indicated CCFBank ranked 28th among 84 lenders with a market share of 0.20 percent. CCFBank's business lending market share was significantly lower than its deposit share; however, positive consideration was given to performance given the larger volume of small business lenders in the AA. The top five business lenders represent 76.98 percent of the small business loan market.

Small farm lending activity is excellent. Aggregate small farm loan data for 2024 indicated CCFBank ranked sixth among 21 lenders with a market share of 3.31 percent. CCFBank's small farm lending market was significantly higher than its deposit share.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. The bank's percentage of home mortgage loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units in those geographies and the aggregate lending percentage.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is very poor. The bank's percentage of business loans in moderate-income CTs was significantly lower than the percentage of businesses located in moderate-income CTs and the aggregate lending percentage. CCFBank did not originate any loans in moderate-income CTs.

Small Loans to Farms

Refer to Table 11 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is excellent. The bank's percentage of farm loans in moderate-income CTs significantly exceeded the percentage of farms located in moderate-income CTs and the aggregate lending percentage.

Lending Gap Analysis

Maps and lending activity were reviewed for the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified in the Minneapolis MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent. The bank's percentage of home mortgage loans to low-income borrowers significantly exceeded the percentage of low-income families in the AA and the aggregate lending percentage. The bank's

percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending percentage.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent. The bank's percentage of loans to small businesses was lower than the percentage of small businesses within the AA and exceeded the aggregate lending percentage.

Small Loans to Farms

Refer to Table 12 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is excellent. The bank's percentage of loans to small farms was lower than the percentage of small farms within the AA and significantly exceeded the aggregate lending percentage.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$5.5 million, which represented 47.32 percent of allocated capital. Allocated capital is the percentage of deposits in the AA multiplied by the bank's tier one capital as of December 31, 2024. The loan was for an affordable housing apartment complex that is restricted to Section 8 housing.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated two SBA 7a loans totaling \$475 thousand and one Freddie Mac Home Possible loan totaling \$352 thousand in the Minneapolis MMSA.

INVESTMENT TEST

The institution's performance under the Investment Test in Minneapolis MMSA is rated Substantial Noncompliance.

The institution's performance in the Minneapolis MMSA is very poor. The institution has few, if any, qualified investments, including grants, not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis MMSA	0	0	22	14	22	100.00	14	100.00	0	0
Total	0	0	22	14	22	100.00	14	100.00	0	0

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

CCFBank made few qualified CD investments in the Minneapolis MMSA. Qualified investments consisted of 22 donations totaling \$13.70 thousand and represented less than one percent of allocated capital. CCFBank made contributions towards community services for LMI individuals and affordable housing.

The following are examples of qualified investments in the MMSA:

- CCFBank made two qualified donations totaling \$1.50 thousand to one organization that supports affordable housing.
- CCFBank made three qualified donations totaling \$1.25 thousand to one organization that provides free education, resources, and support for LMI individuals.
- CCFBank made one qualified donation totaling \$1.10 thousand to an emergency food shelf.

SERVICE TEST

The institution's performance under the Service Test in Minneapolis MMSA is rated Outstanding.

The institution's performance in the Minneapolis MMSA is excellent.

Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems													2022 - 2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Minneapolis MMSA	100.00	2	100.00	0.00	0.00	100.00	0.00	0.00	0.00	10.11	59.40	29.87	0.61
Total	100.00	2	100.00	0.00	0.00	100.00	0.00	0.00	0.00	10.11	59.40	29.87	0.61

Source: FFIEC File - 2020, 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

There were two full-service branches in the Minneapolis MMSA, both of which are in middle-income CTs. The branch percentage in moderate-income geographies was below the population percentage in moderate-income geographies. While there are no branches in moderate-income CTs, both branches are located near to moderate-income CTs and are reasonably accessible to those areas and individuals.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Minneapolis MMSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2022 - 12/31/2024 Bank Data.							

The bank did not open or close any branches or deposit-taking ATMs in the Minneapolis MMSA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and individuals. Lobby and drive-up hours are similar between all branches in the AA and comparable to branches in other AAs. Each of the two branches offers similar lobby and drive-up service hours each weekday. The Oakdale branch does not offer drive-up hours on Saturday morning.

Community Development Services

The institution is a leader in providing CD services. Bank employees provided an excellent level of CD services in the Minneapolis MMSA. Six employees provided 287 qualified service hours to six qualified CD organizations benefiting the AA. CD services supported economic development and community services for LMI individuals.

The following are examples of CD services provided in the Minneapolis MMSA:

- One employee served as a Board Treasurer for an organization that supports economic development by connecting businesses with grants and financing opportunities, resources, and free training in Ellsworth, Wisconsin.
- Two employees served as Board or committee members for an organization that supports economic development through maintaining and increasing living wage jobs along with promoting, attracting, and retaining local businesses in Oakdale, Minnesota.
- Three employees provided financial literacy training to a public high school where a majority of students qualify for free/reduced lunch in Oakdale, Minnesota.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans throughout CTs of different income levels is adequate.
- The distribution of loans to businesses and farms of different sizes and individuals of different income levels is excellent.
- The bank made few CD loans.
- Lending levels reflect good responsiveness to credit needs in the AA.
- The bank made a significant level of CD investments and demonstrates adequate responsiveness to the needs of the AA.
- Employees provided an excellent level of CD services to qualified organizations.
- The bank's service delivery systems are readily accessible to geographies of different income levels.

Description of Institution's Operations in State of Minnesota

The bank had two AAs in the State of Minnesota: MN Non-MSA and Mankato MSA. CCFBank's primary lending focus in Minnesota was home mortgage loans followed by farm loans. The State of Minnesota was the second-largest rating area for the bank, with operations in Minnesota accounting for 18.97 percent of total bank deposits, 27.27 percent of total bank branches, and 16.68 percent of loan originations by number during the evaluation period.

MN Non-MSA

For the 2022 analysis period, the MN Non-MSA consisted of Faribault, Freeborn, Goodhue, Martin, Rice, and Watonwan Counties. CCFBank operated seven full-service branches within the AA. The branches were in Albert Lea, Blue Earth, Fairmont, Faribault, Red Wing, Saint James, and Wells. The bank closed their branches in Red Wing in November 2022 and Saint James in September 2022, resulting in Goodhue and Watonwan Counties being removed from the AA for the 2023-24 analysis period.

For both the 2022 and 2023-2024 analysis periods, CCFBank's primary lending focus in the MN Non-MSA was home mortgage loans. For the 2022 analysis period, home mortgage loans accounted for 49.06 percent of loans by number, and farm and business loans each accounted for 25.47 percent of loans by number. For the 2023-2024 analysis period, home mortgage loans accounted for 48.45 percent of loans by number, farm loans accounted for 30.93 percent of loans by number, and business loans accounted for 20.62 percent of loans by number.

The 2024 FDIC Deposit Market Share Report indicated CCFBank ranked 6th among 34 deposit-taking institutions in the AA, with a market share of 5.12 percent. The top five competitors by market share were Wells Fargo, Profinium Inc., The State Bank of Faribault, First Bank Blue Earth, and Reliance Bank, with a combined market share of 38.48 percent.

As part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the MN Non-MSA. One contact worked for a county development corporation in Faribault County that focuses on attracting, retaining, and expanding businesses in Faribault County. The contact shared there is succession planning concerns relating to small businesses. The contact identified support for entrepreneurs in the form of credit builder classes and start-up funding as needs. Additionally, the contact identified funding to childcare companies through donating/renting space, providing access to capital, or making home improvement loans so childcare providers can continue to provide their services. Another contact, who worked for a farm service agency (FSA) in Faribault County, identified real estate loans to farmers as a community need. The contact noted opportunities for banks to partner with FSAs to provide financing to local farms. Another contact, who worked for the Goodhue County government, shared that the area is focused on development and increasing workforce housing in Red Wing given the number of large employers in the area. The contact identified credit for affordable housing construction as a community need.

The following tables provide information on the demographic composition of the MN Non-MSA.

Assessment Area - MN Non-MSA						
2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	0.00	15.09	54.72	30.19	0.00
Population by Geography	190,773	0.00	16.30	49.52	34.18	0.00
Housing Units by Geography	82,251	0.00	16.89	51.68	31.42	0.00
Owner-Occupied Housing by Geography	56,529	0.00	13.97	51.46	34.57	0.00
Occupied Rental Units by Geography	18,551	0.00	25.93	52.01	22.05	0.00
Vacant Units by Geography	7,171	0.00	16.57	52.61	30.82	0.00
Businesses by Geography	6,295	0.00	20.37	45.67	33.96	0.00
Farms by Geography	1,152	0.00	3.47	59.64	36.89	0.00
Family Distribution by Income Level	48,684	16.64	18.00	21.75	43.61	0.00
Household Distribution by Income Level	75,080	20.85	16.51	18.23	44.41	0.00
Unemployment rate (%)	4.24	0.00	8.21	3.89	3.16	0.00
Households Below Poverty Level (%)	10.64	0.00	17.77	10.96	6.27	0.00
Median Family Income (Non-MSAs - MN)		\$74,737	Median Housing Value			\$157,200
Median Family Income (Non-MSAs - MN) for 2022		\$83,600	Median Gross Rent			\$787
			Families Below Poverty Level			6.68
FFIEC File - 2020 Census						
2022 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area - MN Non-MSA						
2023 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.00	17.95	56.41	25.64	0.00
Population by Geography	131,938	0.00	21.28	49.34	29.38	0.00
Housing Units by Geography	56,519	0.00	22.29	52.01	25.71	0.00
Owner-Occupied Housing by Geography	38,450	0.00	18.77	52.05	29.18	0.00
Occupied Rental Units by Geography	12,636	0.00	33.48	52.01	14.51	0.00
Vacant Units by Geography	5,433	0.00	21.15	51.70	27.15	0.00
Businesses by Geography	4,769	0.00	25.54	45.15	29.31	0.00
Farms by Geography	749	0.00	5.47	65.15	29.37	0.00
Family Distribution by Income Level	33,202	17.81	18.75	21.53	41.91	0.00
Household Distribution by Income Level	51,086	21.47	16.77	18.50	43.26	0.00
Unemployment rate (%)	4.56	0.00	7.21	4.41	3.27	0.00
Households Below Poverty Level (%)	10.87	0.00	18.23	10.46	5.24	0.00
Median Family Income (Non-MSAs - MN)		\$74,710	Median Housing Value			\$150,200
Median Family Income (Non-MSAs - MN) for 2024		\$90,300	Median Gross Rent			\$742
			Families Below Poverty Level			6.92
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Mankato MSA

The Mankato MSA consisted of Blue Earth and Nicollet Counties in Minnesota. CCFBank operated two full-service branches within the AA. The branches were located in Mankato and Saint Peter. CCFBank closed the Saint Peter branch in June 2024; however, the closure did not affect the boundaries or evaluation period for this AA.

CCFBank's primary lending focus in the Mankato MSA was home mortgage loans. Home mortgage loans accounted for 75.00 percent of loans by number, business loans accounted for 13.89 percent of loans by number, and farm loans accounted for 11.11 percent of loans by number. The 2024 FDIC Deposit Market Share Report indicated CCFBank ranked 11th among 20 deposit-taking institutions in the AA, with a market share of 2.57 percent. The top five competitors by market share were Wells Fargo, Community Bank Mankato, Pioneer Bank, U.S. Bank, and First National Bank Minnesota, with a combined market share of 59.43 percent.

Scope of Evaluation in State of Minnesota

The rating for the State of Minnesota is based on the performance in the MN Non-MSA and Mankato MSA. Examiners selected the MN Non-MSA for a full-scope review. Examiners performed a limited-scope review of the Mankato MSA given that it represents a small portion of loan and deposit volume within the state. The MN Non-MSA consisted of 83.33 percent of the branches, 70.28 percent of deposits, and 73.82 percent of loans by number in the state. The Mankato MSA consisted of 16.67 branches, 29.72 percent of deposits, and 26.18 percent of loans by number in the state.

Within the MN Non-MSA, examiners analyzed home mortgage loans, small loans to businesses, and small loans to farms to arrive at Lending Testing conclusions. The MN Non-MSA had two separate analysis periods, 2022 and 2023-2024, given changes in the AA delineation. The analysis periods received equal weight because lending volume was similar in each period. For both analysis periods,

home mortgage loans represented the largest proportion of lending by number; therefore, home mortgage loans received the most weight when determining Lending Test conclusions. For the 2022 analysis, small loans to businesses and farms received equal weight. For the 2023-2024 analysis period, small loans to farms represented a larger proportion than small loans to businesses and received more weight. Within the Mankato MSA, examiners analyzed home mortgage loans. Home mortgage loans represented the largest proportion of lending by number within the Mankato MSA. Examiners did not analyze business or farm loans in the Mankato MSA given the volume of business and farm loans during the evaluation period was insufficient to conduct a meaningful analysis. For both AAs, the geographic distribution conclusion was based solely on performance in moderate-income CTs given there were no low-income CTs in the AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

The bank's performance in the MN Non-MSA is adequate.

Lending Activity

Lending levels reflect good responsiveness.

Table 3: Lending Activity								2022-2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Mankato MSA	54	10	8	0	0	72	26.09	29.72
MN Non-MSA	99	47	57	1	0	204	73.91	70.28
Total	153	57	65	1	0	276	100.00	100.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Mankato MSA	14,829	2,339	1,930	0	0	19,098	41.16	29.72
MN Non-MSA	14,160	4,099	8,945	95	0	27,299	58.84	70.28
Total	28,989	6,438	10,875	95	0	46,397	100.00	100.00
Source: 1/1/2022 - 12/31/2022 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

MN Non-MSA

Lending levels reflect good responsiveness. For the 2022 and 2023-24 analysis periods, CCFBank's lending market share in the MN Non-MSA is good compared to its deposit share. The 2022 FDIC Deposit Market Share report indicated CCFBank ranked eighth among 46 deposit-taking institutions,

with a market share of 3.96 percent. The 2024 FDIC Deposit Market Share report indicated CCFBank ranked sixth among 34 deposit-taking institutions, with a market share of 5.12 percent.

Home mortgage lending activity is good. Aggregate home mortgage data for 2022 indicated CCFBank ranked 21st among 296 lenders, with a market share of 1.14 percent. CCFBank's home mortgage lending share was significantly lower than its deposit share; however, positive consideration was given to performance given the significantly high number of mortgage lenders in the AA. The top five lenders captured 25.61 percent of the market. Aggregate home mortgage data for 2024 indicated CCFBank ranked 32nd among 218 lenders, with a market share of 0.92 percent. CCFBank's home mortgage lending was significantly lower than its deposit share; however, positive consideration was given to performance given the significantly high number of mortgage lenders in the AA. The top five lenders captured 25.26 percent.

Business lending activity is adequate. Aggregate business loan data for 2022 indicated CCFBank ranked 15th among 75 lenders, with a 0.98 percent market share. CCFBank's business lending market share was significantly lower than its deposit share; however, positive consideration was given to performance given high competition in the AA. The top five lenders captured 65.52 percent of the small business loan market. Aggregate business loan data for 2024 indicated CCFBank was ranked 21st among 70 lenders, with a market share of 0.52 percent. CCFBank's business lending share was significantly lower than its deposit share; however, positive consideration was given to performance given the high competition in the AA. The top five business lenders represent 67.55 percent of the market.

Farm lending activity is excellent. Aggregate farm loan data for 2022 indicated CCFBank ranked seventh among 26 lenders, with a market share of 4.38 percent. Aggregate farm loan data for 2024 indicated CCFBank was ranked fifth among 22 lenders, with a market share of 5.64 percent. CCFBank's farm lending share exceeded its deposit share in both years.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the state of Minnesota 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.

MN Non-MSA

The geographic distribution of home mortgage loans is adequate.

During the 2022 analysis period, the bank's percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units and the aggregate lending percentage.

During the 2023-2024 analysis period, the bank's percentage of home mortgage loans in moderate-income geographies was significantly lower than the percentage of owner-occupied housing units and the aggregate lending percentage.

Small Loans to Businesses

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

MN Non-MSA

The geographic distribution of business loans in the MN Non-MSA is very poor.

During the 2022 analysis period, the bank's percentage of business loans in moderate-income geographies was lower than the percentage of small businesses located in those geographies and the aggregate lending percentage.

During the 2023-2024 analysis period, the bank's percentage of business loans in moderate-income geographies was significantly lower than the percentage of small businesses located in those geographies and the aggregate lending percentage. CCFBank did not make any business loans in moderate-income geographies.

Small Loans to Farms

Refer to Table 11 in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

MN Non-MSA

The geographic distribution of farm loans in the MN Non-MSA is adequate.

During the 2022 analysis period, CCFBank's percentage of farms loans in moderate-income CTs was lower than the percentage of farms located in those CTs and the aggregate lending percentage. CCFBank made no farm loans in moderate-income geographies. Aggregate lending was similarly low.

Demographic data indicated only 40 farms, or 3.41 percent of farms in the AA, were located in the AA's eight moderate-income CTs, which presented limited lending opportunities.

During the 2023-2024 analysis period, CCFBanks's percentage of farms loans in moderate-income CTs was significantly lower than the percentage of farms located in those CTs and the aggregate lending percentage. CCFBank made no farm loans in moderate-income geographies. Aggregate lending was similarly low. Demographic data indicated only 41 farms, or 5.47 percent of farms in the AA, were located in the AA's seven moderate-income CTs, which presented limited lending opportunities.

Lending Gap Analysis

Maps and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified in the MN Non-MSA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of Minnesota 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.

MN Non-MSA

The distribution of home mortgage loans among individuals of different income levels in the MN Non-MSA is excellent.

During the 2022 analysis period, the bank's percentage of home mortgage loans originated to low-income borrowers was somewhat lower than the percentage of low-income families in the AA and significantly exceeded the aggregate lending percentage. The bank's percentage of home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA and the aggregate lending percentage.

During the 2023-2024 analysis period, the bank's percentage of home mortgage loans to low-income borrowers significantly exceeded the percentage of low-income families in the AA and the aggregate lending percentage. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was somewhat lower than the aggregate lending percentage.

Small Loans to Businesses

Refer to Table 10 in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

MN Non-MSA

The distribution of loans to businesses of different sizes in the MN Non-MSA is excellent.

During both the 2022 and 2023-2024 analysis periods, CCFBank's percentage of loans to small businesses was somewhat lower than the percentage of small businesses within the AA and significantly exceeded the aggregate lending percentage.

Small Loans to Farms

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

MN Non-MSA

The distribution of loans to farms of different sizes in the MN Non-MSA is excellent.

During the 2022 analysis period, CCFBank's percentage of loans to small farms was near to the percentage of small farms within the AA and significantly exceeded the aggregate lending percentage.

During the 2023-2024 analysis period, CCFBank's percentage of loans to small farms was somewhat lower than the percentage of small farms within the AA and significantly exceeded the aggregate lending percentage.

Community Development Lending

The institution made a low level of CD loans.

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

MN Non-MSA

CCFBank made few CD loans in the MN Non-MSA. CCFBank originated one CD loan totaling \$95 thousand, representing 0.34 percent of allocated capital. The loan was to an organization to finance multiple affordable housing projects in Blue Earth, Minnesota.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated four SBA 7a loans in the AA totaling \$873 thousand and two USDA Rural Housing loans totaling \$301 thousand.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 14 in the state of Minnesota section of appendix D for the facts and data that support the limited-scope conclusions.

The bank's performance under the Lending Test in the Mankato MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Of note, the geographic distribution is excellent, and the borrower distribution is good in the Mankato MSA. Geographic distribution performance was stronger and borrower distribution performance was weaker in the Mankato MSA than the MN Non-MSA.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

The bank's performance in the MN Non-MSA is adequate.

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

The institution exhibits adequate responsiveness to credit and community development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Mankato MSA	2	575	11	243	13	23.21	818	59.80	0	0
MN Non-MSA	1	258	39	283	40	71.43	541	39.55	0	0
Broader Statewide Area	0	0	3	9	3	5.36	9	0.66	0	0
Total	3	833	53	535	56	100.00	1,368	100.00	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

MN Non-MSA

Qualified investments amounted to \$541 thousand and represented 1.95 percent of allocated capital. CCFBank made contributions to affordable housing, economic development, revitalizing/stabilizing LMI geographies and/or retaining existing businesses or residents, and community services for LMI individuals. The bank made 36 donations and three in-kind leases.

The following are examples of qualified investments in the MN Non-MSA:

- CCFBank made one in-kind lease totaling \$90 thousand to an organization that provides daycare and after-school care for a community that is in an underserved geography in Faribault County.
- CCFBank made four donations totaling \$5.6 thousand to an organization that supports domestic abuse survivors through financial support in Blue Earth, Minnesota.
- CCFBank made two donations totaling \$4.7 thousand to an organization that provides affordable and accessible health services targeted to LMI individuals in Rice County and one county outside of the bank's AA.
- CCFBank made three donations totaling \$4.5 thousand to a food shelf in Faribault County.

Broader Statewide Area

In addition to the CD investments that benefited the bank's AAs, CCFBank made three donations totaling \$8.5 thousand that supported the broader statewide area, which includes the bank's AAs. The donations supported community services for LMI individuals. CCFBank made two donations totaling \$5 thousand to a food bank that supports the state of Minnesota and one donation totaling \$3.5 thousand to a foundation that invests in economic growth in south central and southeastern Minnesota.

Conclusions for Area Receiving a Limited-Scope Review

The bank's performance under the Investment Test in the Mankato MSA is stronger than the bank's overall performance under the Investment Test in the full-scope area. CCFBank made a significant level of qualified investments in the Mankato MSA and exhibits good responsiveness to credit and community economic needs. Qualified investments represented 6.99 percent of allocated capital.

SERVICE TEST

The bank's performance under the Service Test in Minnesota is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

The bank's performance in the MN Non-MSA is excellent.

Retail Banking Services

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

MN Non-MSA

The table below illustrates the bank's branch distribution by geography at the end of the evaluation period.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Mankato MSA	29.72	1	16.67	0.00	0.00	100.00	0.00	0.00	0.00	25.37	60.72	13.92	0.00
MN Non-MSA	70.28	5	83.33	0.00	40.00	40.00	20.00	0.00	0.00	21.28	49.34	29.38	0.00
Total	100.00	6	100.00	0.00	33.33	50.00	16.67	0.00	0.00	23.08	54.34	22.58	0.00

Source: FFIEC File - 2020, 2024 Census
 1/1/2022 - 12/31/2024 Bank Data
 Due to rounding, totals may not equal 100.0%

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

During the 2022 analysis period, there were seven full-service branches located in the AA, with two branches located in moderate-income CTs, three branches located in middle-income CTs, and two branches located in upper-income CTs. There were no low-income CTs in the AA. The branch percentage in moderate-income geographies at 28.57 percent significantly exceeded the population percentage in moderate-income geographies at 16.30 percent during the 2022 analysis period. During the 2023-2024 analysis period, there were five full-service branches located in the AA, with two branches located in moderate-income CTs, two branches located in middle-income CTs, and one branch located in an upper-income CT. There were no low-income CTs in the AA. The branch percentage in moderate-income geographies significantly exceeded the population percentage in moderate-income geographies during the 2023-2024 analysis period.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings						
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Mankato MSA	0	1	0	0	-1	0	0
MN Non-MSA	0	2	0	0	-1	-1	0
Total	0	3	0	0	-2	-1	0

1/1/20XX - 12/31/20XX Bank Data.

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

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. In September 2022, CCFBank closed the Saint Peter branch, and in November 2022, CCFBank closed the Red Wing branch. The closure of these two branches impacted the bank's AA as there were no other branches or deposit-taking ATM Goodhue and Watonwan Counties; however, the branches were not located in LMI areas. The bank did not open any branches or deposit-taking ATMs in the AA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and individuals. Lobby hours were similar between all branches in the AA and comparable to branches in other AAs. Each of the branches offered similar lobby service hours each weekday. The Faribault, Fairmont, and Wells branch drive-ups were closed on Saturday mornings.

Community Development Services

The institution is a leader in providing CD services.

MN Non-MSA

Bank employees provided an excellent level of CD services in the MN Non-MSA. 12 employees provided a total of 400 hours to 14 qualified CD organizations benefiting the AA. CD services primarily supported revitalizing/stabilizing moderate-income and underserved middle-income geographies, and also supported community services for LMI individuals, affordable housing, and economic development.

The following are examples of CD services provided in the MN Non-MSA:

- Four employees served as Board or committee members of three qualified organizations that provide affordable housing to LMI families in Goodhue, Martin, Faribault, and Rice Counties.
- Two employees served as Board members for an organization that focuses on promoting, attracting, and retaining new businesses in an underserved middle-income geography in Faribault County.
- One employee served as a Board member for an organization that provides food for LMI individuals in Faribault County.

Conclusions for Area Receiving a Limited-Scope Review

The bank's performance under the Service Test in the Mankato MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans throughout CTs of different income levels is excellent.
- The distribution of loans to small businesses and farms of different sizes and individuals of different income levels is excellent.
- Lending levels reflect good responsiveness to credit needs in the AA.
- The bank made an adequate level of CD loans.
- The bank made a poor level of CD investments and demonstrates poor responsiveness to the needs of the AA.
- Employees provided an excellent level of CD services to qualified organizations.
- The bank's service delivery systems are readily accessible to geographies of different income levels.

Description of Institution's Operations in State of Wisconsin

The bank had three AAs in the State of Wisconsin: WI Non-MSA, Eau Claire MSA, and La Crosse MSA. The State of Wisconsin was the largest rating area for the bank, with operations in Wisconsin accounting for 75.44 percent of total bank deposits, 63.64 percent of total bank branches, and 78.23 percent of loan originations by number during the evaluation period.

WI Non-MSA

The WI Non-MSA consisted of Barron, Buffalo, Monroe, Rusk, Trempealeau, and Washburn Counties. As of December 31, 2024, CCFBank operated ten full-service branches in the AA. The branches were in Barron, Ettrick, Ladysmith, Mondovi, Osseo, Rice Lake, Spooner, Strum, and two in Tomah. CCFBank closed one of two branches in Rice Lake during the evaluation period.

CCFBank's primary lending focus in the WI Non-MSA was small business loans. Business loans accounted for 47.58 percent of loans by number, home mortgage loans accounted for 29.49 percent of loans by number, and farm loans accounted for 22.93 percent of loans by number. The 2024 FDIC Deposit Market Share Report indicated CCFBank ranked first among 28 deposit-taking institutions in the AA, with a market share of 15.70 percent. The top five competitors by market share were CCFBank, Dairy State Bank, Sterling Bank, River Bank, and Shell Lake State Bank, with a combined market share of 44.70 percent.

As part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the WI Non-MSA. One contact worked for a regional planning commission in West Central Wisconsin. They noted the local housing stock is aging past acceptable standards, highlighting the need

for new housing construction, primarily affordable housing. The contact also noted there has been a surge in startup businesses. Another contact, who worked for an organization that fights poverty in the region, also noted a need for affordable housing as the local housing stock of rental properties is not well maintained and of poor quality. The contact noted there are opportunities for local financial institutions to participate in the finance of affordable housing developments. The contact also noted a need for banks to participate in financial literacy programs and first-time home buyers programs offered by the organization.

The following table provides information on the demographic composition of the WI Non-MSA.

Assessment Area - WI Non-MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.00	8.89	88.89	2.22	0.00
Population by Geography	167,873	0.00	9.76	86.80	3.44	0.00
Housing Units by Geography	86,866	0.00	8.72	88.76	2.52	0.00
Owner-Occupied Housing by Geography	51,264	0.00	7.54	89.13	3.33	0.00
Occupied Rental Units by Geography	17,418	0.00	16.44	82.12	1.44	0.00
Vacant Units by Geography	18,184	0.00	4.65	94.08	1.27	0.00
Businesses by Geography	5,324	0.00	12.42	84.30	3.29	0.00
Farms by Geography	795	0.00	5.16	88.81	6.04	0.00
Family Distribution by Income Level	44,496	19.09	20.04	23.89	36.98	0.00
Household Distribution by Income Level	68,682	22.52	18.26	20.15	39.07	0.00
Unemployment rate (%)	2.72	0.00	2.80	2.77	1.33	0.00
Households Below Poverty Level (%)	10.06	0.00	11.27	10.02	7.25	0.00
Median Family Income (Non-MSAs - WI)		\$71,403	Median Housing Value			\$160,200
Median Family Income (Non-MSAs - WI) for 2024		\$86,700	Median Gross Rent			\$753
			Families Below Poverty Level			6.46
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Eau Claire MSA

The Eau Claire MSA consisted of Chippewa and Eau Claire Counties. CCFBank operated three full-service branches in the AA. The branches were in Altoona, Chippewa Falls, and Eau Claire.

CCFBank's primary lending focus in the Eau Claire MSA was home mortgage loans. Home mortgage loans accounted for 43.48 percent of loans by number and 58.70 percent by dollar, small business loans accounted for 49.50 percent of loans by number and 36.76 percent by dollar, and farm loans accounted for 7.02 percent of loans by number and 4.54 percent by dollar. The 2024 FDIC Deposit Market Share Report indicated CCFBank ranked second among 22 deposit-taking institutions in the in the AA, with a market share of 13.06 percent. The top five competitors by market share were Northwestern Bank, CCF, Nicolet National Bank, Associated Bank, and US Bank, with a combined market share of 58.52 percent.

As part of this review, examiners contacted the president of a local organization to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the Eau Claire MSA. The contact works for an economic development corporation in Eau Claire. The contact noted that the Eau Claire area is growing, and the housing market has eased slightly due to new development but remains tight due to the growing population. The contact noted a need for affordable high-density housing, stating that affordable housing units sell out before construction begins.

There is also a need for loans to small businesses, specifically for loans below \$1 million. Additionally, examiners referenced a recently completed community contact. The contact worked for an economic development corporation located in Chippewa Falls. The contact identified affordable housing as the primary credit need and noted that the residential real estate market was experiencing difficulty due to market and interest rate uncertainty. According to the contact, most financial institutions in the area support a competitive environment and are involved in many programs that provide training, financial assistance, and resources to the community.

The following table provides information on the demographic composition of the Eau Claire MSA.

Assessment Area - Eau Claire MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	0.00	20.59	58.82	20.59	0.00
Population by Geography	172,007	0.00	19.00	60.04	20.96	0.00
Housing Units by Geography	73,045	0.00	20.41	60.33	19.25	0.00
Owner-Occupied Housing by Geography	45,766	0.00	17.35	65.16	17.50	0.00
Occupied Rental Units by Geography	21,880	0.00	26.76	50.26	22.98	0.00
Vacant Units by Geography	5,399	0.00	20.69	60.25	19.06	0.00
Businesses by Geography	5,832	0.00	22.74	60.39	16.87	0.00
Farms by Geography	421	0.00	13.54	66.27	20.19	0.00
Family Distribution by Income Level	41,232	18.86	18.90	23.86	38.38	0.00
Household Distribution by Income Level	67,646	22.85	16.99	18.99	41.17	0.00
Unemployment rate (%)	3.44	0.00	5.58	2.86	3.18	0.00
Households Below Poverty Level (%)	11.47	0.00	11.91	9.49	17.21	0.00
Median Family Income (20740 - Eau Claire, WI MSA)		\$79,795		Median Housing Value		\$173,200
Median Family Income (20740 - Eau Claire, WI MSA) for 2024		\$99,400		Median Gross Rent		\$820
				Families Below Poverty Level		5.77
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

La Crosse MSA

The bank's La Crosse MSA AA consisted of La Crosse County. CCFBank operated one full-service branch in the AA. The branch was in La Crosse and opened in December 2022. The evaluation period for the La Crosse MSA was 2023 and 2024; 2022 was excluded given the branch was opened just prior to year-end.

CCFBank's primary lending focus in the La Crosse MSA was business loans. Small business loans accounted for 52.94 percent of loans by number, home mortgage loans accounted for 41.18 percent of loans by number, and farm loans accounted for 5.88 percent of loans by number. The 2024 FDIC Deposit Market Share Report indicated CCFBank ranked 14th among 17 deposit-taking institutions in La Crosse County, with a market share of 0.68 percent. The top five competitors by market share were U.S. Bank, Citizens State Bank of La Crosse, Associated Bank, River Bank, and Coulee Bank, with a combined market share of 64.19 percent.

As part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the La Crosse MMSA. The contacts indicated a variety of needs, including financial literacy programs for small businesses and access to sustainable working capital for business growth. One

contact worked for a small business development center in La Crosse that works with business owners and entrepreneurs to facilitate business growth and improvement. The contact identified higher interest rates and business ownership transitions as primary economic concerns in the area. Despite this, the contact noted positive economic conditions including start-up and business growth opportunities, along with increases in technology in rural areas. The contact identified more access to sustainable capital to continue growing businesses as the primary credit need in the area. The contact further identified business education and financial literacy programs, specifically for small business owners, as opportunities for participation from local financial institutions. Another contact worked for a community development and housing organization in La Crosse. The contact identified housing supply shortages and challenges with housing affordability and transportation for lower income individuals. The contact noted that rental housing has not kept pace with job creation.

The following table provides information on the demographic composition of the La Crosse MSA.

Assessment Area - La Crosse MSA						
2023 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.57	14.29	46.43	28.57	7.14
Population by Geography	120,784	2.07	14.90	45.85	32.52	4.66
Housing Units by Geography	50,680	1.81	14.00	48.55	30.53	5.11
Owner-Occupied Housing by Geography	30,074	0.04	9.44	53.09	36.94	0.50
Occupied Rental Units by Geography	18,031	4.93	21.27	41.20	20.28	12.32
Vacant Units by Geography	2,575	0.74	16.27	47.03	27.38	8.58
Businesses by Geography	3,707	1.35	13.11	44.83	28.76	11.95
Farms by Geography	178	0.56	7.30	56.74	33.15	2.25
Family Distribution by Income Level	27,311	15.58	18.02	23.89	42.51	0.00
Household Distribution by Income Level	48,105	22.04	16.76	19.27	41.93	0.00
Unemployment rate (%)	3.48	4.06	4.48	2.52	3.74	7.67
Households Below Poverty Level (%)	11.48	56.56	18.23	7.20	5.35	55.71
Median Family Income (29100 - La Crosse-Onalaska, WI-MN MSA)		\$78,648	Median Housing Value			\$178,200
Median Family Income (29100 - La Crosse-Onalaska, WI-MN MSA) for 2024		\$97,600	Median Gross Rent			\$889
			Families Below Poverty Level			4.08
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in State of Wisconsin

The rating for the State of Wisconsin is based on the performance in the WI Non-MSA, Eau Claire MSA, and La Crosse MSA. Examiners selected all three AAs for full-scope reviews. The WI Non-MSA represented the largest portion of the bank's branches, deposits, and loan volume within the state. For those reasons, the WI Non-MSA carried the most weight in determining the state rating. The Eau Claire MSA carried the next most weight and the La Crosse MSA received the least weight. The WI Non-MSA consisted of 71.43 percent of the branches, 56.64 percent of deposits, and 49.69 percent of loans by number in the state. The Eau Claire MSA consisted of 21.43 percent branches, 41.24 percent of deposits, and 46.36 percent of loans by number in the state. The La Crosse MSA consisted of 7.14 percent of the branches, 2.12 percent of deposits, and 3.95 percent of loans by number in the state.

For the WI Non-MSA, small loans to businesses represented the largest proportion of lending by number and received the most weight when determining Lending Test conclusions in the AA. Home mortgage

lending received the next most weight, followed by farm lending. For the La Crosse MSA, small loans to businesses represented the largest proportion of lending and received the most weight, followed by home mortgage lending. Examiners did not analyze the borrower and geographic distribution of farm loans in the La Crosse MSA given the volume of farm lending during the evaluation period was insufficient to conduct a meaningful analysis. For the Eau Claire MSA, home mortgage loans received the most weight as they represented the largest proportion of loans based on the dollar and number average, followed by small loans to businesses and then small loans to farms. For the WI Non-MSA and Eau Claire MSA the geographic distribution conclusion was solely based on performance in moderate-income CTs given there were no low-income CTs in those AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the WI Non-MSA, La Crosse, and Eau Claire MSA is excellent.

Lending Activity

Lending levels reflected good responsiveness to AAs credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Eau Claire MSA	260	296	42	2	0	600	46.30	41.24
WI Non-MSA	189	305	147	3	0	644	49.69	56.64
La Crosse MSA	21	27	3	1	0	52	4.01	2.12
Total	470	628	192	6	0	1,296	100.00	100.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Eau Claire MSA	90,014	56,364	6,963	4,000	0	157,341	54.10	41.24
WI Non-MSA	46,919	44,528	18,787	3,036	0	113,270	38.95	56.64
La Crosse MSA	8,494	9,743	475	1,500	0	20,212	6.95	2.12
Total	145,427	110,635	26,225	8,536	0	290,823	100.00	100.00
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

WI Non-MSA

CCFBank's lending market share in the WI Non-MSA is good compared to its deposit share. The 2024 FDIC Deposit Market Share report indicated CCFBank ranked first among 28 deposit-taking institutions, with a market share of 15.70 percent.

Home mortgage lending activity is good. Aggregate home mortgage data for 2024 indicated CCFBank ranked 21st among 252 institutions, with a market share of 1.22 percent. CCFBank's home mortgage lending share was significantly lower than its deposit share; however, positive consideration was given to the bank's ranking given the significantly high number of mortgage lenders in the AA. The top five lenders captured 41.68 percent of the market. Credit unions and mortgage companies are prevalent within the market. Most lenders in the AA, 89.68 percent to be specific, had a market share under one percent.

Business lending activity is good. Aggregate business data for 2024 indicated CCFBank ranked fifth among 58 lenders, with a market share of 4.84 percent. CCFBank's business lending share was significantly lower than its deposit share; however, positive consideration was given to the bank's performance given they ranked fifth among business lenders in the AA.

Farm lending activity is excellent. Aggregate farm data for 2024 indicated CCFBank ranked second among 23 lenders, with a market share of 12.47 percent. CCFBank's farm lending share was somewhat lower than its deposit share; however, positive consideration was given to the bank's performance given they ranked second among farm lenders in the AA.

Eau Claire MSA

CCFBank's lending market share in the Eau Claire MSA is good compared to its deposit share. The 2024 FDIC Deposit Market Share report indicated CCFBank ranked second among 22 deposit-taking institutions, with a market share of 13.06 percent.

Home mortgage lending activity is good. Aggregate home mortgage data for 2024 indicated CCFBank ranked tenth among 223 lenders, with a market share of 1.49 percent. CCFBank's home mortgage lending share was significantly lower than its deposit share; however, positive consideration was given to the bank's ranking given the significantly high number of mortgage lenders in the AA. The top five lenders captured 50.26 percent of the market, with the top lender having a market share of 33.09 percent. Credit unions and mortgage companies are prevalent within the market. Most lenders in the AA, 91.93 percent to be specific, had a market share under one percent.

Business lending activity is good. Aggregate business loan data for 2024 indicated CCFBank ranked seventh among 57 lenders, with a market share of 3.56 percent. CCFBank's business lending share was significantly lower than its deposit share; however, positive consideration was given to the bank's ranking given competition in the AA. The top five lenders captured 74.36 percent of the market.

Farm lending activity is excellent. Aggregate small farm data for 2024 indicated CCFBank ranked third among 16 lenders, with a market share of 11.03 percent. CCFBank's farm lending share was somewhat lower than its deposit share; however, positive consideration was given to the bank's performance given they ranked third among farm lenders in the AA. The top lender captured 29.66 percent of the market, and other lenders in the top five had market shares between 6.21 percent and 11.72 percent.

La Crosse MSA

CCFBank's lending market share in the La Crosse MSA is excellent compared to its deposit share. The 2024 FDIC Deposit Market Share report indicated CCFBank ranked 14th among 17 deposit-taking institutions, with a market share of 0.68 percent.

Home mortgage lending activity is good. Aggregate home mortgage loan data for 2024 indicated CCFBank ranked 38th among 190 lenders, with a market share of 0.39 percent. CCFBank's home

mortgage lending share was near to its deposit share. Positive consideration was given to the bank's performance given the significantly high number of mortgage lenders in the AA. The top five lenders captured 45.80 percent of the market, with the top lender having a market share of 33.70 percent. Credit unions and mortgage companies are prevalent within the market. Most lenders in the AA, 86.32 percent to be specific, had a market share under one percent.

Business lending activity is excellent. Aggregate business data for 2024 indicated CCFBank ranked 11th among 54 lenders, with a market share of 1.20 percent. CCFBank's business lending share exceeded its deposit share.

Farm lending activity is excellent. Aggregate farm loan data for 2024 indicated CCFBank ranked fourth among eight lenders, with a market share of 13.64 percent. CCFBank's farm lending share significantly exceeded its deposit share.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Wisconsin 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.

WI Non-MSA

The geographic distribution of home mortgage loans in the WI Non-MSA is excellent. The bank's percentage of home mortgage loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and the aggregate lending percentage in moderate-income geographies.

Eau Claire MSA

The geographic distribution of home mortgage loans in the Eau Claire MSA is excellent. The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in moderate-income geographies and the aggregate lending percentage.

La Crosse MSA

The geographic distribution of home mortgage loans in the La Crosse MSA is excellent. The bank's percentage of home mortgage loans in LMI geographies significantly exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate lending percentage.

Small Loans to Businesses

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

WI Non-MSA

The geographic distribution loans in the WI Non-MSA is excellent. The bank's percentage of business loans in moderate-income geographies exceeded the percentage of businesses located in moderate-income geographies and the aggregate lending percentage.

Eau Claire MSA

The geographic distribution of business loans in the Eau Claire MSA is excellent. The bank's percentage of business loans in moderate-income geographies exceeded the percentage of businesses located in moderate-income geographies and the aggregate lending percentage.

La Crosse MSA

The geographic distribution of business loans in the La Crosse MSA is adequate. The bank's percentage of business loans in low-income geographies was lower than the percentage of businesses located in low-income geographies and the aggregate lending percentage. CCFBank made no business loans in low-income geographies. Demographic data indicated only 50 businesses were located in low-income geographies, which presented limited lending opportunities. The bank's percentage of business loans in moderate-income geographies was lower than the percentage of businesses located in those geographies and the aggregate lending percentage. Lower lending volumes were somewhat explainable given this was a new AA for the bank during this evaluation period and there is considerable competition within the market.

Small Loans to Farms

Refer to Table 11 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

WI Non-MSA

The geographic distribution of farm loans in the WI Non-MSA is excellent. CCFBank's percentage of farm loans in moderate-income CTs significantly exceeded the percentage of farms located in those CTs and the aggregate lending percentage.

Eau Claire MSA

The geographic distribution of farm loans in the Eau Claire MSA is poor. CCFBank's percentage of farm loans in moderate-income CTs was significantly lower than the percentage of farms located in those CTs and the aggregate lending percentage.

Lending Gap Analysis

Maps and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified in the WI Non-MSA, Eau Claire MSA, and La Crosse MSA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of Wisconsin 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.

WI Non-MSA

The distribution of home mortgage loans among individuals of different income levels in the WI Non-MSA is good. The percentage of home mortgage loans to low-income borrowers was significantly lower than the percentage of low-income families in the AA and exceeded the percentage of aggregate lending. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families in the AA and the aggregate lending percentage.

Eau Claire MSA

The distribution of home mortgage loans among individuals of different income levels in the Eau Claire MSA is good. The bank's percentage of home mortgage loans to low-income borrowers was significantly lower than the percentage of low-income families in the AA and near to the aggregate lending. Housing affordability limited lending opportunities for low-income families. Demographic data reported 18.86 percent of families were low-income and 5.77 percent of families were below poverty level in the AA. Low-income borrowers earned less than \$49,700 annually. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was near to the aggregate lending percentage.

La Crosse MSA

The distribution of home mortgage loans among individuals of different income levels in the La Crosse MSA is adequate. The bank's percentage of home mortgage loans to low-income borrowers was significantly lower than the percentage of low-income families in the AA and lower than the percentage of aggregate lending. The bank's percentage of home mortgage loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families in the AA and the aggregate lending percentage.

Small Loans to Businesses

Refer to Table 10 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

WI Non-MSA

The distribution of loans to businesses of different sizes in the WI Non-MSA is excellent. CCFBank's percentage of loans to small businesses was somewhat lower than the percentage of small businesses within the AA and significantly exceeded the aggregate lending percentage.

Eau Claire MSA

The distribution of loans to businesses of different sizes in the Eau Claire MSA is excellent. CCFBank's percentage of loans to small businesses was lower than the percentage of small businesses within the AA and exceeded the aggregate lending percentage.

La Crosse MSA

The distribution of loans to businesses of different sizes in the La Crosse MSA is adequate. CCFBank's percentage of loans to small businesses was significantly lower than the percentage of small businesses within the AA and somewhat lower than the aggregate lending percentage.

Small Loans to Farms

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

WI Non-MSA

The distribution of loans to farms of different sizes in the WI Non-MSA is excellent. CCFBank's percentage of loans to small farms was somewhat lower than the percentage of small farms within the AA and significantly exceeded the aggregate lending percentage.

Eau Claire MSA

The distribution of loans to farms of different sizes in the Eau Claire MSA is excellent. CCFBank's percentage of loans to small farms was significantly lower than the percentage of small farms within the AA and significantly exceeded the aggregate lending percentage. Examiners placed more weight on the bank's performance in comparison to aggregate lending given it was more reflective of the lending opportunities in the AA.

Community Development Lending

The institution made an adequate level of CD loans.

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

WI Non-MSA

CCFBank made a low level of CD loans in the WI Non-MSA. CCFBank originated three CD loans totaling \$3.04 million, representing 3.42 percent of allocated capital. Loans were to revitalize/stabilize moderate-income CTs and underserved middle-income CTs.

The following are examples of the bank's CD loans:

- CCFBank made a \$2.5 million loan that supported a local school district's operating account in Washburn County, which is a middle-income underserved county.
- CCFBank made a \$255 thousand loan to a city for street and public works equipment, which is used to support infrastructure in a moderate-income CT.

Eau Claire MSA

CCFBank made a relatively high level of CD loans in the Eau Claire MSA. CCFBank originated two CD loans totaling \$4 million, representing 6.19 percent of allocated capital. The loans were made to a nonprofit organization that used the funds to purchase and repair single-family homes for individuals facing housing insecurity.

La Crosse MSA

CCFBank made an excellent level of CD loans in the La Crosse MSA. CCFBank originated one loan totaling \$1.5 million, representing 45.10 percent of allocated capital. The loan was to an affordable housing organization and supported expenses associated with the acquisition and renovation of single-family homes in the La Crosse area.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank was an active participant in the SBA 7a lending program in the State of

Wisconsin, originating 93 loans totaling \$63.19 million during the analysis period. In 2022 and 2023, the bank was the largest 7a lender in Wisconsin with assets between \$1 billion and \$5 billion. The bank also participated in Freddie Mac's Home Possible program and originated one loan totaling \$120 thousand in the State of Wisconsin through this program.

INVESTMENT TEST

The bank's performance under the Investment Test in Wisconsin is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Reviews

The bank's performance in the WI Non-MSA is very poor, performance in the Eau Claire MSA is adequate, and performance in the La Crosse MSA is good.

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

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

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Eau Claire MSA	2	1,268	57	341	59	44.36	1,609	64.90	0	0
WI Non-MSA	2	360	55	109	57	42.86	469	18.92	0	0
La Crosse MSA	0	0	7	381	7	5.26	381	15.37	0	0
Broader Statewide Area	0	0	10	20	10	7.52	20	0.81	0	0
Total	4	1,628	129	851	133	100.00	2,479	100.00	0	0

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

WI Non-MSA

CCFBank made few qualified CD investments in the WI Non-MSA. The institution exhibits poor responsiveness to credit and community economic needs.

Qualified investments amounted to \$469 thousand and represented 0.53 percent of allocated capital. The bank made 54 donations and one in-kind lease during the evaluation period and had two outstanding prior period investments in Freddie Mac mortgage-backed securities. CCFBank made contributions to affordable housing, revitalizing/stabilizing LMI geographies, and community services for LMI individuals.

The following are examples of qualified investments in the WI Non-MSA:

- CCFBank made three donations totaling \$17.5 thousand to an organization that provided affordable after school and summer care targeted to LMI individuals in Tomah.
- CCFBank made three donations totaling \$6.9 thousand to a homeless shelter in Rice Lake.
- CCFBank made two donations totaling \$3.5 thousand to an economic development corporation located in an underserved middle-income CT that promotes the development of new businesses and help businesses relocate to Washburn County.

Eau Claire MSA

CCFBank made an adequate level of qualified CD investments in the Eau Claire MSA. The institution exhibits adequate responsiveness to credit and community economic needs.

Qualified investments amounted to \$1.61 million and represented 2.49 percent of allocated capital. The bank made 56 donations and one investment during the evaluation period and had two outstanding prior period investments in Freddie Mac mortgage-backed securities. CCFBank made contributions towards community services for LMI individuals and affordable housing.

The following are examples of qualified investments in the Eau Claire MSA:

- CCFBank purchased a \$210 thousand mortgage-backed security that supported affordable housing in Eau Claire County.
- CCFBank made six donations totaling \$52.50 thousand to a homeless shelter in Eau Claire.
- CCFBank made three donations totaling \$15 thousand to an organization that serves free daily meals primarily to LMI individuals in the Eau Claire community.

La Crosse MSA

CCFBank made a significant level of qualified CD investments in the La Crosse MSA. The institution exhibits good responsiveness to credit and community economic needs.

Qualified investments amounted to \$381 thousand and represented 11.46 percent of allocated capital. The bank made six donations and one investment. CCFBank made contributions towards community services for LMI individuals and affordable housing.

The following are examples of qualified investments in the La Crosse:

- CCFBank purchased a \$365 thousand mortgage-backed security that supported affordable housing in La Crosse County.
- CCFBank made two donations totaling \$10 thousand to an organization that provides affordable housing in the La Crosse area.
- CCFBank made one donation totaling \$1.5 thousand to a food pantry that serves the La Crosse area.

Broader Statewide Area

In addition to the CD investments that benefited the bank's AAs, CCFBank made ten donations totaling \$19.85 thousand that supported the broader statewide area, including the bank's AAs. Donations supported economic development, affordable housing, and community services for LMI individuals. For example, CCFBank made three donations totaling \$6 thousand to an organization that invests in economic growth through new business start-up grants in various counties in Wisconsin, including Buffalo, Clark, Chippewa, Dunn, Eau Claire, Jackson, Pepin, Pierce, St. Croix, and Trempealeau Counties.

SERVICE TEST

The bank's performance under the Service Test in Wisconsin is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the WI Non-MSA, Eau Claire MSA, and La Crosse MSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs.

Assessment Area	Deposits	Branches						Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Eau Claire MSA	41.24	3	21.43	0.00	0.00	100.00	0.00	0.00	0.00	19.00	60.04	20.96	0.00
WI Non-MSA	56.64	10	71.43	0.00	40.00	60.00	0.00	0.00	0.00	9.76	86.80	3.44	0.00
La Crosse MSA	2.12	1	7.14	100.00	0.00	0.00	0.00	0.00	2.07	14.90	45.85	32.52	4.66
Total	100.00	14	100.00	7.14	28.57	64.29	0.00	0.00	0.54	14.56	66.07	17.61	1.22

Source: FFIEC File - 2020, 2024 Census
 1/1/2022 - 12/31/2024 Bank Data
 Due to rounding, totals may not equal 100.0%

Assessment Area	Branch Openings/Closings						
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Eau Claire MSA	0	0	0	0	0	0	0
WI Non-MSA	0	1	0	0	-1	0	0
La Crosse MSA	1	0	+1	0	0	0	0
Total	1	1	+1	0	-1	0	0

1/1/2022 - 12/31/2024 Bank Data.

WI Non-MSA

Branch locations are readily accessible to geographies and individuals of different income levels. During 2022, there were 11 full-service branches located in the AA, with four branches located in moderate-income CTs and seven branches located in middle-income CTs. There were no low-income CTs in the AA. The branch percentage in moderate-income geographies at 36.36 percent significantly exceeded the population in moderate-income geographies at 9.76 percent during 2022. At the end of the evaluation period, there were ten full-service branches in the WI Non-MSA, with four branches located in moderate-income CTs and six branches located in middle-income CTs. There are no low-income CTs in the WI Non-MSA. The branch percentage in moderate-income geographies significantly exceeded the population percentage in moderate-income geographies.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals. In November 2022, CCFBank closed one branch located in a middle-income CT in Rice Lake. The closure of the branch did not impact the bank's AA as the bank has another branch in Rice Lake.

Services and business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and individuals. Lobby and drive-up hours were similar between branches in the AA and comparable to branches in other AAs. Each of the ten branches offered similar lobby service hours each weekday and drive-up hours during the normal weekday business hours and on Saturday morning.

Eau Claire MSA

Branch locations are reasonably accessible to geographies and individuals of different income levels. There were three full-service branches located in the Eau Claire MSA, all of which were located in middle-income CTs. There are no low-income CTs in the AA. The bank had no branches in a moderate-income CT; therefore, the percentage of branches was below the population percentage in moderate-income geographies. While there are no branches in moderate-income CTs, all three branches are located near moderate-income geographies and are reasonably accessible to those areas and individuals.

The bank did not open or close any branches or deposit-taking ATMs in the Eau Claire MSA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and individuals. Lobby and drive-up hours were similar between branches in the AA and comparable to branches in other AAs. Each of the three branches offered similar lobby service hours each weekday and drive-up hours during the normal weekday business hours. The Gateway Drive and Lake Hallie branch drive-ups were closed on Saturday mornings.

La Crosse MSA

Branch locations are readily accessible to geographies and individuals of different income levels. There was one location located in the La Crosse MSA, which was located in a low-income CT. The branch percentage in a low-income CT significantly exceeded the population percentage in low-income geographies. The bank had no branches in a moderate-income CT; therefore, the percentage of branches was below the population percentage in moderate-income geographies. While there are no branches in moderate-income CTs, the La Crosse branch is located near to moderate-income CTs and is reasonably accessible to those areas and individuals.

To the extent changes have been made, the institution's branch opening has improved the accessibility of its delivery systems, particularly to LMI geographies and individuals.

Services and business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and individuals. Lobby and drive-up hours were comparable to branches in other AAs. The drive-up was closed on Saturday mornings.

Community Development Services

The institution was a leader in providing CD services.

WI Non-MSA

Bank employees provided an excellent level of CD services in the WI non-MSA. 30 employees provided 599 qualified service hours to 20 qualified CD organizations benefiting the AA. CD services primarily supported community services for LMI individuals, economic development, and affordable housing.

The following are examples of CD services provided to the WI Non-MSA:

- 18 employees provided financial literacy to six area schools (Tomah, Spooner, and Rice Lake, Wisconsin) where a majority of students qualify for free/reduced lunch.

- One employee served as a committee member for Washburn County that receives Community Development Block Grants and provides grants to LMI individuals for affordable housing in the county, which contains underserved middle-income geographies.
- One employee served as a Board member for an economic development organization that administers revolving loans funds to support new and existing businesses in underserved middle-income areas in Washburn County.

Eau Claire MSA

Bank employees provided an excellent level of CD services in the Eau Claire MSA. 27 employees provided 544 qualified service hours to 13 qualified CD organizations benefiting the AA. CD services supported community services for LMI individuals and economic development.

The following are examples of CD services provided to the Eau Claire MSA:

- One employee served as a Chair of the Board and committee member for an economic development corporation that allocates funds for the creation and retention of jobs, including LMI positions in Chippewa Valley, Wisconsin.
- Three employees provided credit counseling to individuals staying at a homeless shelter in Eau Claire, Wisconsin.
- Ten employees provided financial literacy to five elementary schools in the Eau Claire Area where a majority of students qualify for free/reduced lunch.

La Crosse MSA

Bank employees provided an excellent level of CD services in the La Crosse MSA. Six employees provided 129 qualified service hours to three qualified CD organizations benefiting the AA. CD services primarily supported community services for LMI individuals and affordable housing.

The following are examples of CD services provided to the La Crosse MSA:

- One employee served as a Board member for a non-profit that offers community services targeted to LMI individuals with development disabilities.
- Four employees served an organization that raises funds for affordable housing in the La Crosse Area.

Broader State Area

Two bank employees provided 40 qualified service hours to two CD organizations that served the broader state, including the bank's AAs. For example, one employee served on the Board of an emergency shelter that provides temporary shelter to LMI adults and their children and programs to help these individuals find permanent residences and employment.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022-12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, small farm. Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Minneapolis MMSA	Full-Scope	Pierce and Washington Counties
State of Minnesota		
MN Non-MSA	Full-Scope	2022: Faribault, Freeborn, Martin, Rice, Goodhue, Watonwan Counties 2023-2024: Faribault, Freeborn, Martin, and Rice Counties
Mankato MSA	Limited-Scope	Blue Earth and Nicollet Counties
State of Wisconsin		
La Crosse MSA	Full-Scope	2023-2024: La Crosse County
Eau Claire MSA	Full-Scope	Eau Claire and Chippewa Counties
WI Non-MSA	Full-Scope	Barron, Buffalo, Monroe, Rusk, Trempealeau, and Washburn Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
CCFBank National Association	Outstanding	Needs to Improve	Outstanding	Satisfactory
MMSA or State:				
Minneapolis MMSA	Outstanding	Substantial Noncompliance	Outstanding	Satisfactory
Minnesota	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Wisconsin	Outstanding	Needs to Improve	Outstanding	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

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

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

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

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

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares 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 to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - Compares 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 to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Minneapolis MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Minneapolis MMSA	38	14,842	100.00	28,279	0.00	0.00	0.00	10.04	18.42	8.39	59.77	73.68	57.75	30.19	7.89	33.84	0.00	0.00	0.01
Total	38	14,842	100.00	28,279	0.00	0.00	0.00	10.04	18.42	8.39	59.77	73.68	57.75	30.19	7.89	33.84	0.00	0.00	0.01
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Minneapolis MMSA	38	14,842	100.00	28,279	14.80	26.32	8.24	18.10	23.68	22.55	23.79	18.42	23.74	43.31	28.95	31.98	0.00	2.63	13.49
Total	38	14,842	100.00	28,279	14.80	26.32	8.24	18.10	23.68	22.55	23.79	18.42	23.74	43.31	28.95	31.98	0.00	2.63	13.49
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Minneapolis MMSA	28	4,241	100.00	18,059	0.00	0.00	0.00	9.41	0.00	8.22	60.81	85.71	55.62	29.73	14.29	36.16	0.04	0.00	0.00
Total	28	4,241	100.00	18,059	0.00	0.00	0.00	9.41	0.00	8.22	60.81	85.71	55.62	29.73	14.29	36.16	0.04	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MMSA	28	4,241	100.00	18,059	88.81	57.14	53.02	3.00	42.86	8.19	0.00
Total	28	4,241	100.00	18,059	88.81	57.14	53.02	3.00	42.86	8.19	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																2022 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Minneapolis MMSA	18	2,519	100.00	371	0.00	0.00	0.00	14.65	72.22	32.35	58.59	27.78	52.56	26.77	0.00	15.09
Total	18	2,519	100.00	371	0.00	0.00	0.00	14.65	72.22	32.35	58.59	27.78	52.56	26.77	0.00	15.09
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis MMSA	18	2,519	100.00	371	96.97	66.67	48.52	2.02	33.33	1.01	0.00
Total	18	2,519	100.00	371	96.97	66.67	48.52	2.02	33.33	1.01	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

State of Minnesota

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
MN Non-MSA	52	8,361	100.00	4,562	0.00	0.00	0.00	13.97	13.46	15.19	51.46	61.54	45.55	34.57	25.00	39.26	0.00	0.00	0.00
Total	52	8,361	100.00	4,562	0.00	0.00	0.00	13.97	13.46	15.19	51.46	61.54	45.55	34.57	25.00	39.26	0.00	0.00	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
MN Non-MSA	47	5,799	100.00	4,685	0.00	0.00	0.00	18.77	8.51	21.11	52.05	87.23	46.19	29.18	4.26	32.70	0.00	0.00	0.00
Total	47	5,799	100.00	4,685	0.00	0.00	0.00	18.77	8.51	21.11	52.05	87.23	46.19	29.18	4.26	32.70	0.00	0.00	0.00

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Mankato MSA	54	14,829	100.00	5,654	0.00	0.00	0.00	16.23	24.07	18.69	68.82	64.81	67.44	14.96	11.11	13.85	0.00	0.00	0.00
Total	54	14,829	100.00	5,654	0.00	0.00	0.00	16.23	24.07	18.69	68.82	64.81	67.44	14.96	11.11	13.85	0.00	0.00	0.00

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
MN Non-MSA	528,361		100.00	4,562	16.64	13.46	9.23	18.00	26.92	22.27	21.75	21.15	24.38	43.61	15.38	28.87	0.00	23.08	15.26
Total	528,361	100.00	4,562	16.64	13.46	9.23	18.00	26.92	22.27	21.75	21.15	24.38	43.61	15.38	28.87	0.00	23.08	15.26	
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
MN Non-MSA	475,799		100.00	4,685	17.81	23.40	10.07	18.75	19.15	26.25	21.53	25.53	23.29	41.91	27.66	28.88	0.00	4.26	11.50
Total	475,799	100.00	4,685	17.81	23.40	10.07	18.75	19.15	26.25	21.53	25.53	23.29	41.91	27.66	28.88	0.00	4.26	11.50	
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Mankato MSA	5414,829		100.00	5,654	20.51	14.81	10.65	17.51	16.67	25.49	24.35	24.07	23.43	37.62	35.19	26.44	0.00	9.26	13.99
Total	5414,829	100.00	5,654	20.51	14.81	10.65	17.51	16.67	25.49	24.35	24.07	23.43	37.62	35.19	26.44	0.00	9.26	13.99	
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MN Non-MSA	27	3,069	100.00	2,722	0.00	0.00	0.00	20.37	11.11	19.29	45.67	88.89	36.85	33.96	0.00	43.86	0.00	0.00	0.00
Total	27	3,069	100.00	2,722	0.00	0.00	0.00	20.37	11.11	19.29	45.67	88.89	36.85	33.96	0.00	43.86	0.00	0.00	0.00
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.																			
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Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2023 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MN Non-MSA	20	1,030	100.00	3,138	0.00	0.00	0.00	25.54	0.00	23.01	45.15	95.00	35.69	29.31	5.00	41.30	0.00	0.00	0.00
Total	20	1,030	100.00	3,138	0.00	0.00	0.00	25.54	0.00	23.01	45.15	95.00	35.69	29.31	5.00	41.30	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
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Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Mankato MSA	10	2,339	100.00	4,443	0.00	0.00	0.00	24.87	20.00	24.29	63.19	60.00	64.03	11.94	20.00	11.68	0.00	0.00	0.00
Total	10	2,339	100.00	4,443	0.00	0.00	0.00	24.87	20.00	24.29	63.19	60.00	64.03	11.94	20.00	11.68	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MN Non-MSA	27	3,069	100.00	2,722	83.32	70.37	50.73	4.65	29.63	12.03	0.00
Total	27	3,069	100.00	2,722	83.32	70.37	50.73	4.65	29.63	12.03	0.00
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MN Non-MSA	20	1,030	100.00	3,138	84.17	70.00	48.53	4.36	30.00	11.47	0.00
Total	20	1,030	100.00	3,138	84.17	70.00	48.53	4.36	30.00	11.47	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mankato MSA	10	2,339	100.00	4,443	82.10	10.00	46.86	4.53	90.00	13.37	0.00
Total	10	2,339	100.00	4,443	82.10	10.00	46.86	4.53	90.00	13.37	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
MN Non-MSA	27	4,225	100.00	616	0.00	0.00	0.00	3.47	0.00	0.81	59.64	85.19	55.03	36.89	14.81	44.16	0.00	0.00	0.00
Total	27	4,225	100.00	616	0.00	0.00	0.00	3.47	0.00	0.81	59.64	85.19	55.03	36.89	14.81	44.16	0.00	0.00	0.00
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2023 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
MN Non-MSA	30	4,720	100.00	676	0.00	0.00	0.00	5.47	0.00	1.18	65.15	66.67	65.83	29.37	33.33	32.99	0.00	0.00	0.00
Total	30	4,720	100.00	676	0.00	0.00	0.00	5.47	0.00	1.18	65.15	66.67	65.83	29.37	33.33	32.99	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Mankato MSA	8	1,930	100.00	496	0.00	0.00	0.00	5.06	0.00	0.81	90.80	100.00	97.98	4.14	0.00	1.21	0.00	0.00	0.00
Total	8	1,930	100.00	496	0.00	0.00	0.00	5.06	0.00	0.81	90.80	100.00	97.98	4.14	0.00	1.21	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MN Non-MSA	27	4,225	100.00	616	98.35	92.59	42.86	0.95	7.41	0.69	0.00
Total	27	4,225	100.00	616	98.35	92.59	42.86	0.95	7.41	0.69	0.00
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2023 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MN Non-MSA	30	4,720	100.00	676	98.66	73.33	33.28	0.67	26.67	0.67	0.00
Total	30	4,720	100.00	676	98.66	73.33	33.28	0.67	26.67	0.67	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Mankato MSA	8	1,930	100.00	496	96.55	87.50	39.31	2.53	12.50	0.92	0.00
Total	8	1,930	100.00	496	96.55	87.50	39.31	2.53	12.50	0.92	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

State of Wisconsin

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Eau Claire MSA	260	90,014	57.91	12,609	0.00	0.00	0.00	17.35	20.00	18.62	65.16	61.92	64.09	17.50	18.08	17.29	0.00	0.00	0.00
WI Non-MSA	189	46,919	42.09	10,776	0.00	0.00	0.00	7.54	13.76	8.31	89.13	85.71	88.76	3.33	0.53	2.90	0.00	0.00	0.00
Total	449	136,933	100.00	23,385	0.00	0.00	0.00	12.17	17.37	13.87	77.82	71.94	75.46	10.01	10.69	10.66	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
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Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
La Crosse MSA	21	8,494	100.00	5,449	0.04	4.76	0.88	9.44	14.29	12.97	53.09	38.10	57.11	36.94	38.10	26.92	0.50	4.76	2.11
Total	21	8,494	100.00	5,449	0.04	4.76	0.88	9.44	14.29	12.97	53.09	38.10	57.11	36.94	38.10	26.92	0.50	4.76	2.11
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Eau Claire MSA	260	90,014	57.91	12,609	18.86	8.85	9.18	18.90	20.77	22.62	23.86	21.92	24.79	38.38	28.85	31.58	0.00	19.62	11.82
WI Non-MSA	189	46,919	42.09	10,776	19.09	11.11	7.97	20.04	19.58	21.71	23.89	15.34	23.28	36.98	37.57	33.93	0.00	16.40	13.10
Total	449	136,933	100.00	23,385	18.98	9.80	8.63	19.49	20.27	22.20	23.88	19.15	24.10	37.65	32.52	32.66	0.00	18.26	12.41
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
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Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023 - 2024	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
La Crosse MSA	21	8,494	100.00	5,449	15.58	4.76	8.31	18.02	14.29	18.63	23.89	4.76	25.00	42.51	42.86	35.62	0.00	33.33	12.44	
Total	21	8,494	100.00	5,449	15.58	4.76	8.31	18.02	14.29	18.63	23.89	4.76	25.00	42.51	42.86	35.62	0.00	33.33	12.44	
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																				
Due to rounding, totals may not equal 100.0%																				

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Eau Claire MSA	296	56,364	49.25	7,577	0.00	0.00	0.00	22.74	24.66	21.17	60.39	60.14	58.99	16.87	15.20	19.84	0.00	0.00	0.00
WI Non-MSA	305	44,528	50.75	5,942	0.00	0.00	0.00	12.42	15.08	11.07	84.30	84.92	86.17	3.29	0.00	2.76	0.00	0.00	0.00
Total	601	100,892	100.00	13,519	0.00	0.00	0.00	17.81	19.80	16.73	71.80	72.71	70.94	10.39	7.49	12.33	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2023 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
La Crosse MSA	27	9,743	100.00	2,824	1.35	0.00	0.81	13.11	7.41	14.62	44.83	44.44	47.27	28.76	48.15	28.15	11.95	0.00	9.14
Total	27	9,743	100.00	2,824	1.35	0.00	0.81	13.11	7.41	14.62	44.83	44.44	47.27	28.76	48.15	28.15	11.95	0.00	9.14
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Eau Claire MSA	296	56,364	49.25	7,577	82.42	51.35	50.47	4.82	43.92	12.76	4.73
WI Non-MSA	305	44,528	50.75	5,942	81.29	65.57	52.59	4.24	31.48	14.46	2.95
Total	601	100,892	100.00	13,519	81.88	58.57	51.40	4.54	37.60	13.57	3.83
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
La Crosse MSA	27	9,743	100.00	2,824	79.36	37.04	49.36	6.34	62.96	14.30	0.00
Total	27	9,743	100.00	2,824	79.36	37.04	49.36	6.34	62.96	14.30	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Eau Claire MSA	42	6,963	22.22	451	0.00	0.00	0.00	13.54	4.76	15.96	66.27	80.95	67.18	20.19	14.29	16.85	0.00	0.00	0.00
WI Non-MSA	147	18,787	77.78	1,111	0.00	0.00	0.00	5.16	12.93	8.01	88.81	87.07	88.84	6.04	0.00	3.15	0.00	0.00	0.00
Total	189	25,750	100.00	1,562	0.00	0.00	0.00	8.06	11.11	10.31	81.00	85.71	82.59	10.94	3.17	7.11	0.00	0.00	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2023 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
La Crosse MSA	3	475	100.00	50	0.56	0.00	0.00	7.30	0.00	2.00	56.74	33.33	76.00	33.15	66.67	20.00	2.25	0.00	2.00
Total	3	475	100.00	50	0.56	0.00	0.00	7.30	0.00	2.00	56.74	33.33	76.00	33.15	66.67	20.00	2.25	0.00	2.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Eau Claire MSA	42	6,963	22.22	451	98.57	45.24	34.59	1.19	54.76	0.24	0.00
WI Non-MSA	147	18,787	77.78	1,111	96.35	72.79	41.85	2.14	25.17	1.51	2.04
Total	189	25,750	100.00	1,562	97.12	66.67	39.76	1.81	31.75	1.07	1.59
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2023 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
La Crosse MSA	3	475	100.00	50	96.07	0.00	24.00	1.69	100.00	2.25	0.00
Total	3	475	100.00	50	96.07	0.00	24.00	1.69	100.00	2.25	0.00
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											