



PUBLIC DISCLOSURE

May 20, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

National Exchange Bank and Trust
Charter Number: 13879

130 South Main St.
Fond du Lac, WI 54936

Office of the Comptroller of the Currency

1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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.

Table of Contents

| | |
|--|-----|
| Overall CRA Rating..... | 1 |
| Description of Institution..... | 2 |
| Scope of the Evaluation..... | 2 |
| Discriminatory or Other Illegal Credit Practices Review..... | 3 |
| State Rating..... | .5 |
| State of Wisconsin..... | 5 |
| Appendix A: Scope of Examination..... | A-1 |
| Appendix B: Summary of MMSA and State Ratings..... | B-1 |
| Appendix C: Definitions and Common Abbreviations..... | C-1 |
| Appendix D: Tables of Performance Data..... | D-1 |

Overall CRA Rating

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

The following table indicates the performance level of National Exchange Bank and Trust (NEBAT) with respect to the Lending, Investment, and Service Tests:

| Performance Levels | National Exchange Bank and Trust Performance Tests | | |
|---------------------------|---|--------------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | | | |
| High Satisfactory | | X | X |
| Low Satisfactory | X | | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |

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

The major factors that support this rating include:

- The Lending Test rating is based on an adequate level of lending in the bank’s assessment areas (AAs), good lending activity, good geographic distribution of home mortgage loans and small loans to businesses, good distribution of home mortgage loans among borrowers of different incomes and small business loans among business of different sizes, and a good level of community development (CD) loans.
- The Investment Test rating is based on an overall good level of CD investments.
- The Service Test rating is based on the bank’s retail services being reasonably accessible to geographies and individuals of different income levels and an adequate level of CD services.

Lending in Assessment Area

A substantial majority of the bank’s loans are in in its AAs.

The bank originated and purchased 85.9 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

| Table D - Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|-----------------|-------------|--------------|-------------|--------------|---------------------------------|-------------|--------------------|-------------|----------------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 3,596 | 89.5 | 420 | 10.5 | 4,016 | 496,612,490 | 79.1 | 130,905,580 | 20.8 | 627,518,070 |
| Small Business | 2,993 | 80.4 | 731 | 19.6 | 3,724 | 344,304,000 | 82.9 | 70,901,000 | 17.1 | 415,205,000 |
| Small Farm | 565 | 96.4 | 20 | 3.4 | 585 | 51,218,000 | 94.8 | 2,806,000 | 5.1 | 54,024,000 |
| Total | 7,154 | 85.9 | 1,171 | 14.1 | 8,325 | 892,134,490 | 81.3 | 204,612,580 | 18.7 | 1,096,747,070 |

Description of Institution

NEBAT is a federally chartered intrastate bank headquartered in Fond du Lac, Wisconsin. NEBAT is a wholly owned subsidiary of NEB Corporation, which is the bank's holding company headquartered in Fond du Lac, WI. The holding company is controlled by the members that also control the Stone Foundation (foundation). This foundation has provided grants to support the activities of local nonprofit groups. At the bank's request, we considered qualified investments of the foundation in the evaluation of the bank's Investment Test performance.

NEBAT is a full-service bank that currently operates 32 banking offices throughout central and eastern Wisconsin. NEBAT has seven AAs located in the state of Wisconsin. In August 2021, NEBAT closed branches in Cascade, Glenbeulah, and Fairwater, Wisconsin. In August 2023, one branch was relocated within Brandon, Wisconsin. There were no acquisitions or branch purchases since the previous evaluation.

As of December 31, 2023, NEBAT had total assets of \$2.79 billion and tier 1 capital of \$493.7 million. The bank reported total loans of \$1.69 billion, representing 60.75 percent of total assets.

The bank offers a wide range of products and services while maintaining a community bank orientation. Products include, but are not limited to, traditional lending, deposits, treasury management products and services, and trust services. The bank's loan portfolio consists of 80.67 percent commercial loans, 14.76 percent residential real estate loans, 3.04 percent agricultural loans, and 1.67 percent consumer loans.

The bank received a Satisfactory rating at the prior Large Bank CRA Performance Evaluation dated May 17, 2021. The Lending Test was rated High Satisfactory, the Investment Test was rated Low Satisfactory, and the Service Test was rated High Satisfactory. There are no legal or financial factors impeding the bank's ability to meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

NEBAT was evaluated using Large Bank procedures to assess the bank's record of meeting the credit needs of its community. Large Bank procedures include a Lending Test, Investment Test, and Service Test. The evaluation period for the Lending Test, Investment Test, Service Test, and the CD loans is

January 1, 2021, through December 31, 2023. For the Lending Test, we evaluated home mortgage loans, which include home purchase, home improvement, refinance, and multifamily loans reported under the Home Mortgage Disclosure Act (HMDA). We evaluated small loans to businesses and small loans to farms reported from the bank's CRA lending data.

This evaluation period included two census periods. For mortgage lending activity in 2021, the OCC compared the bank's performance to the HMDA aggregate lender data as well as the 2015 American Community Survey (ACS) census data. For mortgage lending activity during 2022-2023, the OCC compared the bank's performance to the aggregate lender data and the 2020 census data, which the FFIEC released in 2022. Our analysis of small business lending in 2021 focused on comparison of the bank's performance with 2021 data from Dunn & Bradstreet (D&B) and comparison to aggregate CRA (small business) data. In 2022-2023, our analysis of small business lending focused on comparison with 2022 D&B data. The 2023 aggregate CRA lender data had not been published on the date of this evaluation. As a result, performance tables have been separated and include 2021 separately, and 2022 through 2023. Data is discussed in the applicable narrative sections of the evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect good responsiveness to the credit needs in its AAs.
- The institution exhibits a good geographic distribution of loans in its AAs.
- The institution exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The institution has an excellent level of qualified investments. The institution exhibits an excellent responsiveness to credit and community development needs.
- The institution's service delivery systems are accessible to geographies and individuals of different income levels in its AAs. Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems.
- The institution provides a relatively high level of CD services.

Description of Institution's Operations in Wisconsin

NEBAT has designated seven AAs within the State of Wisconsin rating area. The Fond du Lac MSA consists of Fond du Lac County. The Appleton MSA consists of Calumet County. The Madison MSA consists of Columbia County. The Milwaukee-Waukesha MSA consists of Washington, Waukesha, and Milwaukee counties. The Oshkosh-Neenah MSA consists of Winnebago county. The Sheboygan MSA consists of Sheboygan County. The non-MSA consists of Dodge, Green Lake, Marquette, and Waushara counties. Based on 2020 FFIEC List of Middle-Income Distressed and Underserved Counties, Marquette County is considered underserved due its remote, rural location.

Fond du Lac MSA

The bank's main office is headquartered in Fond du Lac, WI in a moderate-income census tract (CT). The Fond du Lac MSA consists of Fond du Lac County. NEBAT operates 11 branches in the cities of Brandon (1), Campbellsport (1), Eden (1), Fond du Lac (4), New Holstein (1), Mt Calvary (1), Rosendale (1), and Waupun (1). There are 23 CTs in the AA. As of the 2020 census, there are no low-income CTs, 4 moderate-income CTs, 15 middle-income CTs, and 4 upper-income CTs. The city of Fond du Lac is in a moderate-income CT. There are 29 traditional ATMs at the branches and three deposit-taking Interactive Teller Machines (ITMs) at the main office location.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2023, the Fond du Lac MSA accounted for approximately 59.7 percent of the bank’s total deposits. NEBAT ranks first among 12 deposit-taking institutions with 46.74 percent of the deposit market share. NEBAT’s primary competitors are U.S. Bank National Association, Horicon Bank, and BMO Harris Bank National Association.

Economy

The economy in the Fond du Lac MSA continues to be stable. Major industry sectors that account for majority of the employment include healthcare, manufacturing, utilities, trade, and education. Major employers in the AA include Agnesian Healthcare, Miron Construction, Mercury Marine, and Ahern.

The unemployment rate as of December 2023 for Fond du Lac County was 2.4 percent. The unemployment rate for the State of Wisconsin was 2.9 percent during the same period.

Community Contact

Examiners reached out to a community contact within the AA to gain an understanding of the CD needs and credit opportunities of the AA. The community organization focused on affordable housing and economic development for low- and moderate-income (LMI) individuals. The contact we spoke with stated there is a lack of housing in the area. Another concern in the AA is that new jobs are being created, but there is a lack of individuals applying for the positions being created.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: NEBAT Fond du Lac MSA 2021 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 20 | 5.0 | 5.0 | 85.0 | 5.0 | 0.0 |
| Population by Geography | 101,920 | 3.6 | 5.7 | 82.0 | 8.6 | 0.0 |
| Housing Units by Geography | 44,326 | 4.4 | 6.9 | 81.0 | 7.7 | 0.0 |
| Owner-Occupied Units by Geography | 29,372 | 1.2 | 2.5 | 87.1 | 9.2 | 0.0 |
| Occupied Rental Units by Geography | 11,697 | 11.6 | 17.1 | 67.5 | 3.8 | 0.0 |
| Vacant Units by Geography | 3,257 | 7.4 | 8.9 | 75.2 | 8.4 | 0.0 |
| Businesses by Geography | 5,371 | 9.0 | 5.2 | 78.2 | 7.6 | 0.0 |
| Farms by Geography | 448 | 0.7 | 0.9 | 87.7 | 10.7 | 0.0 |
| Family Distribution by Income Level | 27,232 | 17.0 | 18.4 | 25.2 | 39.4 | 0.0 |
| Household Distribution by Income Level | 41,069 | 22.5 | 16.5 | 20.4 | 40.5 | 0.0 |
| Median Family Income MSA – 22540 Fond du Lac, WI MSA | | \$67,472 | Median Housing Value | | | \$147,403 |
| | | | Median Gross Rent | | | \$694 |
| | | | Families Below Poverty Level | | | 6.5% |
| <i>Source: 2015 ACS Census and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: NEBAT Fond du Lac MSA 2023 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 23 | 0.0 | 17.4 | 65.2 | 17.4 | 0.0 |
| Population by Geography | 104,154 | 0.0 | 18.9 | 64.1 | 17.0 | 0.0 |
| Housing Units by Geography | 45,338 | 0.0 | 19.8 | 62.9 | 17.3 | 0.0 |
| Owner-Occupied Units by Geography | 29,588 | 0.0 | 12.4 | 67.0 | 20.5 | 0.0 |
| Occupied Rental Units by Geography | 12,302 | 0.0 | 36.8 | 52.9 | 10.3 | 0.0 |
| Vacant Units by Geography | 3,448 | 0.0 | 22.6 | 63.0 | 14.5 | 0.0 |
| Businesses by Geography | 7,992 | 0.0 | 19.7 | 63.5 | 16.8 | 0.0 |
| Farms by Geography | 580 | 0.0 | 4.1 | 74.0 | 21.9 | 0.0 |
| Family Distribution by Income Level | 27,483 | 17.1 | 20.2 | 25.2 | 37.4 | 0.0 |
| Household Distribution by Income Level | 41,890 | 21.1 | 17.3 | 20.7 | 41.0 | 0.0 |
| Median Family Income MSA – 22540 Fond du Lac, WI MSA | | \$81,968 | Median Housing Value | | | \$163,174 |
| | | | Median Gross Rent | | | \$780 |
| | | | Families Below Poverty Level | | | 5.5% |
| <i>Source: 2020 ACS Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Milwaukee MSA

The Milwaukee MSA consists of Milwaukee, Washington, and Waukesha counties. NEBAT operates three branches in the cities of Allenton (1), Waukesha (1), and West Bend (1). ATMs are located at each branch location.

According to the FDIC Deposit Market Share Report as of June 30, 2023, the Milwaukee MSA AA accounted for approximately 11.7 percent of the bank’s total deposits. NEBAT ranks 26th among 42 deposit-taking institutions with 0.34 percent of the deposit market share. NEBAT’s primary competitors are U.S. Bank National Association, BMO Harris Bank National Association, and JPMorgan Chase Bank, National Association.

Economy

The economy in Milwaukee MSA is considered stable. Major industry sectors that account for a majority of the employment include healthcare, trade, education, and manufacturing. Major employers in the MSA include Rockwell Automation, Milwaukee Tool, Schreiber Foods, Froedtert Hospital, and GE HealthCare.

The unemployment rate as of December 2023 for the Milwaukee MSA include Washington County at 2.4 percent, Waukesha County at 2.4 percent, and Milwaukee County at 3.5 percent. The unemployment rate for the state of Wisconsin was 2.9 percent during the same period.

Community Contact

Examiners reached out to a community contact within the AA to gain an understanding of the needs and credit opportunities of the AA. The community organization focused on community services for LMI individuals. The contact we spoke with stated that there is a lack of housing inventory, and rental rates have increased significantly. Their focus was the services that they offer to individuals in need.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: NEBAT Milwaukee MSA 2021 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 412 | 24.0 | 16.5 | 31.8 | 27.2 | 0.5 |
| Population by Geography | 1,482,733 | 17.7 | 15.7 | 33.3 | 33.3 | 0.0 |
| Housing Units by Geography | 634,882 | 17.0 | 16.0 | 35.0 | 32.0 | 0.0 |
| Owner-Occupied Units by Geography | 350,075 | 7.9 | 12.8 | 36.1 | 43.2 | 0.0 |
| Occupied Rental Units by Geography | 239,528 | 26.5 | 20.7 | 35.4 | 17.4 | 0.0 |
| Vacant Units by Geography | 45,279 | 37.5 | 16.0 | 24.0 | 22.5 | 0.0 |
| Businesses by Geography | 87,180 | 12.5 | 13.0 | 34.5 | 39.9 | 0.0 |
| Farms by Geography | 1,890 | 7.3 | 8.5 | 36.6 | 47.7 | 0.0 |
| Family Distribution by Income Level | 363,789 | 24.4 | 16.3 | 19.4 | 39.9 | 0.0 |
| Household Distribution by Income Level | 589,603 | 25.8 | 15.6 | 17.1 | 41.5 | 0.0 |
| Median Family Income MSA – 22540 Fond du Lac, WI MSA | | \$71,764 | Median Housing Value | | | \$182,616 |
| | | | Median Gross Rent | | | \$841 |
| | | | Families Below Poverty Level | | | 11.7% |
| <i>Source: 2015 ACS Census and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: NEBAT Milwaukee MSA 2023 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 430 | 18.8 | 18.4 | 33.0 | 27.7 | 2.1 |
| Population by Geography | 1,483,228 | 13.6 | 16.6 | 35.5 | 33.2 | 1.1 |
| Housing Units by Geography | 643,168 | 13.4 | 17.1 | 37.1 | 31.4 | 1.0 |
| Owner-Occupied Units by Geography | 352,438 | 5.9 | 12.9 | 39.7 | 41.4 | 0.2 |
| Occupied Rental Units by Geography | 245,832 | 21.4 | 22.8 | 35.3 | 18.6 | 1.8 |
| Vacant Units by Geography | 44,898 | 29.3 | 18.3 | 27.2 | 22.4 | 2.9 |
| Businesses by Geography | 154,817 | 11.6 | 16.2 | 33.3 | 38.1 | 0.7 |
| Farms by Geography | 3,082 | 8.3 | 11.0 | 35.2 | 45.3 | 0.2 |
| Family Distribution by Income Level | 360,920 | 23.0 | 17.0 | 20.5 | 39.5 | 0.0 |
| Household Distribution by Income Level | 598,270 | 25.5 | 15.8 | 17.4 | 41.3 | 0.0 |
| Median Family Income MSA – 22540 Fond du Lac, WI MSA | | \$84,829 | Median Housing Value | | | \$204,556 |
| | | | Median Gross Rent | | | \$947 |
| | | | Families Below Poverty Level | | | 9.1% |
| <i>Source: 2020 ACS Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Scope of Evaluation in Wisconsin

For the state of Wisconsin, we performed full-scope reviews of the Fond du Lac MSA and the Milwaukee MSA AAs and limited-scope reviews of the Appleton MSA, Madison MSA, Oshkosh-Neenah MSA, Sheboygan MSA, and the non-MSA AAs. The Fond du Lac MSA was weighted more heavily in arriving at the overall conclusions for the state, as the bank’s largest market share of loans and deposits is concentrated in this area. For the overall conclusions, home mortgage loans and small loans to businesses received the most weight, followed by small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank’s performance under the Lending Test in Wisconsin is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Fond du Lac MSA is excellent, and the performance in the Milwaukee MSA is adequate.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

2021 Analysis

| Number of Loans* | | | | | | | |
|------------------|---------------|----------------|------------|-----------------------|--------------|--------------|-----------------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total | %State Loans | %State Deposits |
| Appleton MSA | 52 | 40 | 2 | 0 | 94 | 2.6 | 1.0 |
| Fond du Lac MSA | 882 | 684 | 79 | 6 | 1,651 | 46.4 | 60.0 |
| Madison MSA | 39 | 68 | 17 | 0 | 124 | 3.5 | 4.0 |
| Milwaukee MSA | 175 | 276 | 4 | 2 | 457 | 12.8 | 12.0 |
| Non MSA | 337 | 321 | 97 | 2 | 757 | 21.2 | 13.0 |
| Oshkosh MSA | 97 | 45 | 0 | 0 | 142 | 4.0 | 1.0 |
| Sheboygan MSA | 216 | 96 | 19 | 2 | 333 | 9.5 | 9.0 |
| Total | 1,798 | 1,530 | 218 | 12 | 3,558 | 100 | 100 |

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

| Dollar Volume of Loans* | | | | | | | |
|-------------------------|----------------|----------------|---------------|-----------------------|-------------------|---------------|-----------------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total | %State* Loans | %State Deposits |
| Appleton MSA | 7,731 | 1,586 | 85 | 0 | 9,402 | 0.1 | 1.0 |
| Fond du Lac MSA | 125,511 | 56,838 | 6,078 | 9,488,627 | 9,677,054 | 48.8 | 60.0 |
| Madison MSA | 4,714 | 3,021 | 1,944 | 0 | 9,679 | 0.1 | 4.0 |
| Milwaukee MSA | 33,640 | 45,961 | 335 | 2,213,000 | 2,292,936 | 11.6 | 12.0 |
| Non MSA | 39,041 | 21,763 | 10,030 | 6,000,000 | 6,070,834 | 30.6 | 13.0 |
| Oshkosh MSA | 13,594 | 3,982 | 0 | 0 | 17,576 | 0.0 | 1.0 |
| Sheboygan MSA | 29,732 | 9,691 | 2,157 | 1,715,000 | 1,756,580 | 8.8 | 9.0 |
| Total | 253,965 | 142,752 | 20,629 | 19,416,627 | 19,834,061 | 100 | 100 |

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

2022-2023 Analysis

| Number of Loans* | | | | | | | |
|------------------|---------------|----------------|------------|-----------------------|--------------|--------------|-----------------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total | %State Loans | %State Deposits |
| Appleton MSA | 52 | 35 | 2 | 0 | 89 | 2.4 | 1.0 |
| Fond du Lac MSA | 858 | 605 | 114 | 2 | 1,579 | 43.6 | 60.0 |
| Madison MSA | 46 | 49 | 35 | 2 | 132 | 3.6 | 4.0 |
| Milwaukee MSA | 194 | 384 | 5 | 0 | 583 | 16.1 | 12.0 |
| Non MSA | 386 | 289 | 158 | 8 | 841 | 23.2 | 13.0 |
| Oshkosh MSA | 70 | 16 | 2 | 1 | 89 | 2.5 | 1.0 |
| Sheboygan MSA | 192 | 85 | 31 | 4 | 312 | 8.6 | 9.0 |
| Total | 1,798 | 1,463 | 347 | 17 | 3,625 | 100 | 100 |

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

| Dollar Volume of Loans* | | | | | | | |
|-------------------------|----------------|----------------|---------------|-----------------------|-------------------|---------------|-----------------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total | %State* Loans | %State Deposits |
| Appleton MSA | 6,259 | 3,400 | 40 | 0 | 9,699 | 1.0 | 1.0 |
| Fond du Lac MSA | 111,318 | 82,481 | 10,115 | 1,630,000 | 1,833,914 | 5.0 | 60.0 |
| Madison MSA | 5,858 | 5,693 | 3,114 | 5,800,000 | 5,814,665 | 17.0 | 4.0 |
| Milwaukee MSA | 38,223 | 62,241 | 289 | 0 | 100,753 | 1.0 | 12.0 |
| Non MSA | 45,792 | 32,841 | 14,570 | 19,625,000 | 19,718,203 | 58.0 | 13.0 |
| Oshkosh MSA | 11,895 | 1,685 | 92 | 1,500,000 | 1,513,672 | 4.0 | 1.0 |
| Sheboygan MSA | 23,303 | 13,211 | 2,369 | 4,750,000 | 4,788,883 | 14.0 | 9.0 |
| Total | 242,648 | 201,552 | 30,589 | 33,305,000 | 33,779,789 | 100 | 100 |

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

Fond du Lac MSA

NEBAT's lending activity in the Fond du Lac MSA is good.

Based upon June 30, 2023, FDIC Deposit Market Share Report, NEBAT achieved a 46.74 percent market share of deposits, ranking them first among 12 financial institutions in the AA. Based upon 2022 peer mortgage data, NEBAT achieved a 15.75 percent market share of home mortgage loans, ranking first among 210 lenders. Based upon 2022 peer small business data, NEBAT achieved a 20.87 percent market share, ranking them first among 56 reporting lenders. For small loans to farms, NEBAT achieved a 25.68 percent market share, ranking them second among 12 reporting lenders. Given the competition

from the other reporting lenders in the AA, and the bank's high ranking among those lenders, home mortgage, small business, and small farms lending activity is excellent.

Milwaukee MSA

NEBAT's lending activity in the Milwaukee MSA is adequate.

Based upon June 30, 2023, FDIC Deposit Market Share Report, NEBAT achieved a 0.34 percent market share of deposits, ranking them 26th among 42 financial institutions in the AA. Based upon 2022 peer mortgage data, NEBAT achieved a 0.16 percent market share of home mortgage loans, ranking 69th among 531 lenders. Based upon 2022 peer small business data, NEBAT achieved a 2.28 percent market share ranking them 21st among 135 reporting lenders. For small loans to farms, NEBAT achieved a 5.39 percent market share, ranking them seventh among 18 reporting lenders.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to table O 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.

2021 Analysis

Fond du Lac MSA

NEBAT's geographic distribution of home mortgage loans is good. The percentage of loans made in low-income geographies is equal to the percentage of owner-occupied housing units and was near to aggregate lending. The percentage of loans originated in moderate-income geographies is below the percentage of owner-occupied housing units and is below aggregate lending in moderate-income geographies.

Milwaukee MSA

NEBAT's geographic distribution of home mortgages is very poor. The percentage of loans made in low-income geographies is significantly below both the owner-occupied housing units and the aggregate lending. The percentage of loans originated in the moderate-income geographies is both below the owner-occupied housing units and the aggregate lending.

2022-2023 Analysis

Fond du Lac MSA

NEBAT's geographic distribution of home mortgages is good. There were no low-income CTs in the Fond du Lac MSA. The percentage of loans in the moderate-income geographies exceeds the percentage of owner-occupied housing units and is below the aggregate lending.

Milwaukee MSA

NEBAT's distribution of home mortgages is poor. The percentage of loans made in low-income geographies is significantly below both the owner-occupied housing units and the aggregate lending.

The percentage of loans in the moderate-income geographies is well below both the percentage of owner-occupied housing units and the aggregate lending.

Small Loans to Businesses

Refer to table Q 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.

The geographic distribution of small loans to businesses was adequate.

2021 Analysis

Fond du Lac MSA

NEBAT's geographic distribution of small loans to businesses is adequate. The percentage of loans originated in low-income geographies is below the percentage of businesses and is near to the aggregate lending in those geographies. The percentage of home mortgage loans in moderate-income geographies is below the percentage of businesses and is near to the aggregate lending.

Milwaukee MSA

NEBAT's geographic distribution of small loans to business is adequate. The percentage of small loans to businesses in low-income geographies is below the percentage of businesses and aggregate lending in those geographies. The percentage of small loans to businesses in moderate-income geographies is near to the percentage of businesses and aggregate lending.

2022-2023 Analysis

Fond du Lac MSA

NEBAT's geographic distribution of small loans to businesses is adequate. There were no low-income CTs in the Fond du Lac MSA. The percentage of loans is below both the percentage of businesses and aggregate lending.

Milwaukee MSA

NEBAT's geographic distribution of small loans to businesses is adequate. The percentage of small loans to businesses in low-income geographies is well below the percentage of businesses and is below the aggregate lending in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses and aggregate lending.

Small Loans to Farms

Refer to table S 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.

The geographic distribution of small loans to farms is adequate. The bank did not originate enough small loans to farms in the Milwaukee MSA, therefore an analysis would not be meaningful.

2021 Analysis

Fond du Lac MSA

An analysis would not be meaningful given the limited number of LMI CTs in the AA.

Milwaukee MSA

An analysis would not be meaningful given the limited number of LMI CTs in the AA.

2022-2023 Analysis

Fond du Lac MSA

NEBAT's geographic distribution of small loans to farms is adequate. There were no low-income CTs. The bank did not originate any loans in moderate-income CTs. Consideration was given to the fact that only 4.1 percent of farms are in the four moderate-income CTs in the Fond du Lac MSA.

Milwaukee MSA

An analysis would not be meaningful given there were only five farm loans in the Milwaukee MSA.

Lending Gap Analysis

The OCC evaluated the lending distribution within the AAs to determine if any unexplained conspicuous gaps existed. We reviewed summary reports, maps, and analyzed NEBAT's home mortgages and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no other unexplained, conspicuous gaps identified.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to table P 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.

The borrower distribution of home mortgage loans is good.

2021 Analysis

Fond du Lac MSA

NEBAT's distribution of home mortgage loans is excellent. The percentage of home mortgage loans to low-income borrowers is below the percentage of low-income families and exceeded the aggregate lending. The percentage of home mortgage loans to moderate-income borrowers exceeds the percentage of moderate-income families and is below aggregate lending.

Milwaukee MSA

NEBAT's distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers is below the percentage of low-income families and exceeds the aggregate lending. The percentage of home mortgage loans to moderate-income borrowers is below both the moderate-income families and aggregate lending.

2022-2023 Analysis

Fond du Lac MSA

NEBAT's distribution of home mortgage loans is excellent. The percentage of loans to low-income borrowers exceeds both the percentage of low-income families and exceeds the aggregate lending. The percentage of home mortgage loans to moderate-income borrowers exceeds the percentage of moderate-income families and is below aggregate lending.

Milwaukee MSA

NEBAT's distribution of home mortgage loans is poor. The percentage of home mortgage loans to low-income borrowers is below the percentage of low-income families but exceeds aggregate lending. The percentage of home mortgage loans to moderate-income borrowers is below both the loans to moderate-income families and the aggregate lending.

Small Loans to Businesses

Refer to table R 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.

The borrower distribution of small loans to businesses is good.

2021 Analysis

Fond du Lac MSA

NEBAT's borrower distribution of small loans to business is good. The percentage of small loans to businesses is below the percentage of small businesses in the AA and exceeds the aggregate lending.

Milwaukee MSA

NEBAT's borrower distribution of small loans to business is good. The percentage of small loans to businesses is below the percentage of small businesses in the AA and exceeds the aggregate lending.

2022- 2023 Analysis

Fond du Lac MSA

NEBAT's borrower distribution of small loans to business is good. The percentage of small loans to businesses is below the percentage of small businesses in the AA and exceeds the aggregate lending.

Milwaukee MSA

NEBAT's borrower distribution of small loans to business is good. The percentage of small loans to businesses is below the percentage of small businesses in the AA and exceeds aggregate lending.

Small Loans to Farms

Refer to table T 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 businesses.

The borrower distribution of small loans to farms is excellent. The bank did not originate enough small loans to farms in the Milwaukee MSA, therefore an analysis would not be meaningful.

2021 Analysis

Fond du Lac MSA

The borrower distribution of small loans to farms is excellent. The percentage of small loans to farms exceeds the percentage of small farms and aggregate lending.

Milwaukee MSA

The bank did not originate enough small loans to farms in the Milwaukee MSA, therefore an analysis would not be meaningful.

2022-2023 Analysis

Fond du Lac MSA

The borrower distribution of small loans to farms is excellent. The percentage of small loans to farms is below the percentage of small farms and exceeds the aggregate lending.

Milwaukee MSA

The bank did not originate enough small loans to farms in the Milwaukee MSA, therefore an analysis would not be meaningful.

Community Development Lending

The institution has made a relatively high level of CD loans. During the evaluation period, NEBAT made a total of 10 CD loans totaling \$13.3 million in the Fond du Lac MSA and Milwaukee MSA. CD Lending had a neutral impact on the Lending Test conclusion.

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.

Fond du Lac MSA

NEBAT's level of CD lending is good. The bank made eight CD loans totaling \$11.1 million, representing 3.8 percent of tier 1 capital. The loans supported various community services, affordable housing, economic development, and revitalization/stabilization.

Milwaukee MSA

NEBAT's level of CD lending is good. The bank made two CD loans, totaling \$2.2 million dollars, representing 3.8 percent of tier 1 capital. The loans supported various community services, affordable housing, economic development, and revitalization/stabilization.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Appleton MSA, Madison MSA, Oshkosh-Neenah MSA, Sheboygan MSA, and the non-MSA AAs is consistent with the bank’s overall performance under the Lending Test in the full-scope areas. In the limited-scope review, the bank’s performance is weaker than the bank’s overall Lending Test performance. The bank’s performance was weaker due to the geographic distribution of both the HMDA reportable loans and the small loans to businesses.

Refer to tables O through T in appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Wisconsin is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Fond du Lac MSA and the Milwaukee MSA is excellent.

The institution has a significant level of qualified CD investments.

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

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|-----------|----------------|-----------|-------|--------------|------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000’s) | # | \$(000’s) | # | % of Total # | \$(000’s) | % of Total \$ | # | \$(000’s) |
| Appleton MSA | 0 | 0 | 5 | 22,640 | 6 | 1 | 22,640 | 1 | 0 | 0 |
| Fond du Lac MSA | 1 | 470,384 | 232 | 7,744,163 | 233 | 61 | 8,214,547 | 30 | 0 | 0 |
| Madison MSA | 0 | 0 | 11 | 382,755 | 11 | 3 | 382,755 | 1 | 0 | 0 |
| Milwaukee MSA | 5 | 7,348,853 | 36 | 8,432,226 | 41 | 11 | 15,781,079 | 57 | 0 | 0 |
| Non-MSA | 3 | 994,525 | 56 | 427,727 | 59 | 15 | 1,422,252 | 5 | 0 | 0 |
| Oshkosh MSA | 1 | 174,503 | 6 | 891,271 | 7 | 2 | 1,065,774 | 4 | 0 | 0 |
| Sheboygan MSA | 1 | 244,738 | 25 | 347,285 | 26 | 7 | 592,023 | 2 | 0 | 0 |

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

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

NEBAT made 78 donations or sponsorships to organizations that help provide community services to LMI individuals and families, totaling \$53 thousand during the evaluation period.

The Stone Foundation and NEBAT Foundation invested \$9 million over the evaluation period to over 100 organizations to provide financial support to charitable and community service organizations in the communities in which NEBAT operates. The foundation’s focus is on supporting affordable housing,

education, health and human services, youth programs, financial literacy, and general community improvement.

Fond du Lac MSA

NEBAT exhibits good responsiveness to credit, community, and economic development needs. This is supported by the various donations and sponsorships throughout the Fond du Lac MSA.

Milwaukee MSA

NEBAT invested in CRA eligible mortgage-backed securities (MBS), where the underlying mortgages were originated with LMI borrowers. All MBS investments benefited the bank's AAs, with large concentrations in the Milwaukee MSA AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Appleton MSA, Madison MSA, non-MSA, Oshkosh MSA, and Sheboygan MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas. These AAs performed in line with other AAs included in the limited scope, with the non-MSA performing above the Milwaukee MSA for the full scope review.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Review

Based on a full-scope reviews, the bank's performance in the Fond du Lac MSA and the Milwaukee MSA is good.

Retail Banking Services

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

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--|--------------------------|--|--|------|-------|-------|--|-------|-------|-------|
| Assessment Area | Deposits % of Rated Area Deposits in AA | # of Bank Branches | % of Rated Area Branches in AA | Branches | | | | Population | | | |
| | | | | Location of Branches by Income of Geographies (%) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Appleton MSA | 1.0 | 1 | 3.1 | 0 | 0 | 100.0 | 0 | 0 | 0 | 68.65 | 31.35 |
| Fond du Lac MSA | 60.0 | 11 | 34.4 | 0 | 27.0 | 63.0 | 10 | 0 | 18.86 | 64.09 | 17.05 |
| Madison MSA | 4.0 | 2 | 6.3 | 0 | 50.0 | 50.0 | 0 | 0 | 36.15 | 63.85 | 0 |
| Milwaukee MSA | 12.0 | 3 | 9.4 | 0 | 0 | 100.0 | 0 | 0 | 2.38 | 37.55 | 60.07 |
| Non-MSA | 13.0 | 9 | 28.1 | 0 | 0 | 100.0 | 0 | 0 | 6.82 | 78.02 | 15.16 |
| Oshkosh MSA | 1.0 | 1 | 3.1 | 0 | 0 | 0 | 100.0 | 0 | 15.87 | 65.03 | 19.10 |
| Sheboygan MSA | 9.0 | 5 | 15.6 | 0 | 0 | 80.0 | 20.0 | 0 | 7.56 | 72.91 | 19.53 |

Fond du Lac MSA

NEBAT’s branch distribution in the Fond du Lac MSA is excellent. Branches are accessible to all portions of the AA, particularly LMI individuals, when considering those branches that are in or near LMI geographies.

Branch openings and closings have not adversely affected the accessibility of the bank’s delivery systems. Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services, including business hours where appropriate, are tailored to the convenience and need of its AA.

Management compliments its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ITMs, and ATMs. These delivery methods provide increased access to banking services throughout the entire AA.

Milwaukee MSA

NEBAT’s branch distribution in the Milwaukee MSA is adequate. There are no branches in LMI geographies. All three of the branches are located in the middle-income CT.

Branch openings and closings have not adversely affected the accessibility of bank’s delivery systems. The bank has not opened or closed any branches in the Milwaukee MSA. Branch hours and services do not vary in a way that would inconvenience portions of the AA.

Management compliments its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, and ATMs. These delivery methods provide increased access to banking services throughout the entire AA.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|--|-----|-----|-----|
| Assessment Area | # of Branch Openings | # of Branch Closings | Branch Openings/Closings | | | |
| | | | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| Appleton MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Fond du Lac MSA | 0 | 1 | 0 | 0 | -1 | 0 |
| Madison MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Milwaukee MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Non MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Oshkosh MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Sheboygan MSA | 0 | 2 | 0 | 0 | -1 | -1 |

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/or to LMI individuals.

Fond du Lac MSA

NEBAT closed one branch in a middle-income CT. This was closed after a sustainability analysis revealed capabilities to increase efficiencies while maintaining connections with customers through their relationship-based business model and various eBanking tools.

Services and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. NEBAT maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending, and services at all branch locations in the AA.

Milwaukee MSA

NEBAT did not open or close any branches within the AA during the evaluation period.

Services and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. NEBAT maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending, and services at all branch location in the AA.

Community Development Services

The bank provides a relatively high level of CD services.

NEBAT is responsive to the needs of the community. During the evaluation period, employees devoted over 2,000 community service hours to the Fond du Lac MSA and approximately 1,000 hours to the Milwaukee MSA that included over 35 organizations. These organizations operate to help meet the community needs by providing community services and economic development opportunities. They provided services to nonprofit organizations that support affordable housing for LMI individuals and families and supported economic development for small businesses.

The following are some examples of some of the CD services provided in the AAs:

- Various employees were guest lecturers in personal finance classes. These classes are held at colleges and high schools whose population is majority LMI students.
- An employee is a committee member for an organization that has development and engagement programs for young professionals and community members. The programs address the LMI community to help them achieve their goals and financial needs as professionals in the community.
- An employee served as a committee member for an organization that promotes economic development in Fond du Lac County. They offer programs and services to attract new businesses, grow existing businesses, and strengthen community workforce in Fond du Lac County.
- Various employees participated in one-on-one mentoring programs and served as board members and committee members to increase financial education efforts amongst the youth of the area. The mentoring programs are held at facilities that are largely LMI.

- An employee served as a board member for an organization to reduce poverty, homelessness and empower individuals to build their economic future. They used their financial expertise to provide financial literacy education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton MSA, Madison MSA, non-MSA, Oshkosh MSA, and Sheboygan MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

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: | January 1, 2021 – December 31, 2023 | |
| Bank Products Reviewed: | Home mortgage, small business, and small farm loans. Community development loans, qualified investments, community development services. | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | | |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| Wisconsin | | |
| Appleton MSA | Limited -scope | Calumet County |
| Fond du Lac MSA | Full - scope | Fond du Lac County |
| Madison MSA | Limited -scope | Columbia County |
| Milwaukee MSA | Full-scope | Washington County, Waukesha County and Milwaukee County |
| Non-MSA | Limited - scope | Portion of Dodge County, Green Lake County, Marquette County, and Waushara County |
| Oshkosh MSA | Limited – scope | Portion of Winnebago County |
| Sheboygan MSA | Limited – scope | Sheboygan County |

Appendix B: Summary of MMSA and State Ratings

| RATINGS National Exchange Bank & Trust | | | | |
|--|----------------------|------------------------|---------------------|--------------------------------------|
| Overall Bank: | Lending Test Rating* | Investment Test Rating | Service Test Rating | Overall Bank/State/Multistate Rating |
| NEBAT | Low Satisfactory | High Satisfactory | High Satisfactory | Satisfactory |

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2021

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| | # | \$ (000) | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Appleton MSA | 52 | 7,732 | 2.9 | 3,290 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 84.1 | 94.2 | 77.1 | 15.9 | 5.8 | 22.9 | 0.0 | 0.0 | 0.0 |
| Fond du Lac MSA | 882 | 125,511 | 49.1 | 5,524 | 1.2 | 1.2 | 1.6 | 2.5 | 1.6 | 2.1 | 87.1 | 83.0 | 85.4 | 9.2 | 14.2 | 11.0 | 0.0 | 0.0 | 0.0 |
| Madison MSA | 39 | 4,714 | 2.2 | 4,117 | 0.0 | 0.0 | 0.0 | 20.1 | 12.8 | 19.3 | 79.9 | 87.2 | 80.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Milwaukee MSA | 175 | 33,640 | 9.7 | 86,083 | 7.9 | 0.6 | 4.0 | 12.8 | 1.1 | 10.9 | 36.1 | 66.3 | 35.6 | 43.2 | 32.0 | 49.5 | 0.0 | 0.0 | 0.0 |
| Non-MSA | 337 | 39,041 | 18.7 | 7,887 | 0.0 | 0.0 | 0.0 | 1.8 | 0.6 | 1.3 | 85.6 | 89.0 | 84.7 | 12.6 | 10.4 | 14.0 | 0.0 | 0.0 | 0.0 |
| Oshkosh MSA | 97 | 13,594 | 5.4 | 9,124 | 0.0 | 0.0 | 0.0 | 9.9 | 4.1 | 10.3 | 62.5 | 76.3 | 60.2 | 27.6 | 19.6 | 29.5 | 0.0 | 0.0 | 0.0 |
| Sheboygan MSA | 216 | 29,732 | 12.0 | 6,218 | 0.0 | 0.0 | 0.0 | 7.7 | 2.8 | 6.7 | 76.3 | 82.4 | 75.5 | 15.9 | 14.8 | 17.8 | 0.0 | 0.0 | 0.0 |
| Total | 1,798 | 253,965 | 100.0 | 122,243 | 5.2 | 0.7 | 2.9 | 10.7 | 1.8 | 9.6 | 50.4 | 82.5 | 47.5 | 33.7 | 15.0 | 40.0 | 0.0 | 0.0 | 0.0 |

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022-23

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| | # | \$ (000) | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Appleton MSA | 52 | 6,259 | 2.9 | 1,259 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 67.9 | 90.4 | 61.8 | 32.1 | 9.6 | 38.2 | 0.0 | 0.0 | 0.0 |
| Fond du Lac MSA | 858 | 111,318 | 47.7 | 2,327 | 0.0 | 0.0 | 0.0 | 12.4 | 12.6 | 14.9 | 67.0 | 66.3 | 67.6 | 20.5 | 21.1 | 17.5 | 0.0 | 0.0 | 0.0 |
| Madison MSA | 46 | 5,858 | 2.6 | 1,824 | 0.0 | 0.0 | 0.0 | 32.6 | 34.8 | 35.9 | 67.4 | 65.2 | 64.1 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Milwaukee MSA | 194 | 38,223 | 10.8 | 33,545 | 5.9 | 0.5 | 7.1 | 12.9 | 6.7 | 13.8 | 39.7 | 53.1 | 38.9 | 41.4 | 39.7 | 39.9 | 0.2 | 0.0 | 0.3 |
| Non-MSA | 386 | 45,792 | 21.5 | 3,777 | 0.0 | 0.0 | 0.0 | 6.3 | 1.3 | 7.3 | 77.8 | 91.2 | 77.8 | 15.9 | 7.5 | 14.9 | 0.0 | 0.0 | 0.0 |
| Oshkosh MSA | 70 | 11,895 | 3.9 | 3,755 | 0.0 | 0.0 | 0.0 | 13.1 | 8.6 | 15.6 | 68.8 | 75.7 | 66.8 | 17.8 | 15.7 | 16.5 | 0.3 | 0.0 | 1.1 |
| Sheboygan MSA | 192 | 23,303 | 10.7 | 2,546 | 0.0 | 0.0 | 0.0 | 3.9 | 3.6 | 6.8 | 73.9 | 71.4 | 72.4 | 22.1 | 25.0 | 20.9 | 0.0 | 0.0 | 0.0 |
| Total | 1,798 | 242,648 | 100.0 | 49,033 | 3.8 | 0.1 | 4.8 | 12.1 | 8.6 | 13.6 | 50.7 | 71.8 | 48.6 | 33.3 | 19.5 | 32.6 | 0.2 | 0.0 | 0.3 |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|------------------|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | # | \$ (000) | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Appleton MSA | 52 | 7,732 | 2.9 | 3,290 | 15.6 | 9.6 | 7.6 | 17.2 | 28.8 | 21.0 | 27.3 | 23.1 | 24.8 | 39.9 | 26.9 | 36.4 | 0.0 | 11.5 | 10.2 |
| Fond du Lac MSA | 882 | 125,511 | 49.1 | 5,524 | 17.0 | 8.1 | 6.5 | 18.4 | 18.5 | 21.3 | 25.2 | 26.8 | 24.4 | 39.4 | 39.9 | 36.4 | 0.0 | 6.8 | 11.4 |
| Madison MSA | 39 | 4,714 | 2.2 | 4,117 | 21.1 | 35.9 | 13.2 | 22.0 | 12.8 | 27.3 | 27.4 | 35.9 | 25.5 | 29.5 | 15.4 | 24.2 | 0.0 | 0.0 | 9.8 |
| Milwaukee MSA | 175 | 33,640 | 9.7 | 86,083 | 24.4 | 8.0 | 6.7 | 16.3 | 13.1 | 18.3 | 19.4 | 25.1 | 22.7 | 39.9 | 46.3 | 38.8 | 0.0 | 7.4 | 13.5 |
| Non-MSA | 337 | 39,041 | 18.7 | 7,887 | 16.2 | 10.7 | 6.0 | 19.7 | 19.3 | 19.0 | 23.6 | 23.7 | 24.2 | 40.5 | 40.1 | 39.5 | 0.0 | 6.2 | 11.4 |
| Oshkosh MSA | 97 | 13,594 | 5.4 | 9,124 | 18.6 | 8.2 | 8.2 | 18.4 | 18.6 | 21.1 | 24.0 | 22.7 | 22.3 | 39.0 | 45.4 | 33.8 | 0.0 | 5.2 | 14.6 |
| Sheboygan MSA | 216 | 29,732 | 12.0 | 6,218 | 17.7 | 13.0 | 8.2 | 18.4 | 27.3 | 22.0 | 25.6 | 25.9 | 23.0 | 38.3 | 23.6 | 33.5 | 0.0 | 10.2 | 13.3 |
| Total | 1,798 | 253,965 | 100.0 | 122,243 | 22.2 | 9.8 | 7.1 | 17.2 | 19.4 | 19.3 | 21.2 | 25.8 | 23.0 | 39.5 | 38.0 | 37.6 | 0.0 | 7.1 | 13.1 |

Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|------------------|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | # | \$ (000) | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Appleton MSA | 52 | 6,2589 | 2.9 | 1,259 | 16.6 | 11.5 | 8.6 | 17.2 | 32.7 | 25.3 | 24.1 | 23.1 | 25.2 | 42.2 | 26.9 | 31.3 | 0.0 | 5.8 | 9.7 |
| Fond du Lac MSA | 858 | 111,318 | 47.7 | 2,327 | 17.1 | 17.7 | 10.9 | 20.2 | 24.7 | 25.9 | 25.2 | 24.4 | 24.0 | 37.4 | 26.1 | 28.0 | 0.0 | 7.1 | 11.2 |
| Madison MSA | 46 | 5,858 | 2.6 | 1,824 | 20.9 | 32.6 | 16.0 | 23.8 | 32.6 | 26.2 | 27.2 | 17.4 | 27.8 | 28.0 | 15.2 | 22.2 | 0.0 | 2.2 | 7.8 |
| Milwaukee MSA | 194 | 38,223 | 10.8 | 33,545 | 23.0 | 10.3 | 8.0 | 17.0 | 13.9 | 20.2 | 20.5 | 18.0 | 21.9 | 39.5 | 42.8 | 36.9 | 0.0 | 14.9 | 13.0 |
| Non-MSA | 386 | 45,792 | 21.5 | 3,777 | 17.4 | 13.5 | 7.9 | 19.8 | 26.4 | 23.1 | 23.2 | 25.6 | 25.4 | 39.6 | 28.8 | 34.0 | 0.0 | 5.7 | 9.6 |
| Oshkosh MSA | 70 | 11,895 | 3.9 | 3,755 | 18.8 | 11.4 | 9.6 | 19.2 | 14.3 | 24.0 | 23.0 | 24.3 | 24.2 | 39.1 | 34.3 | 30.0 | 0.0 | 15.7 | 12.2 |
| Sheboygan MSA | 192 | 23,303 | 10.7 | 2,546 | 15.6 | 13.5 | 10.8 | 20.6 | 19.3 | 23.3 | 24.7 | 24.5 | 23.6 | 39.1 | 29.2 | 29.4 | 0.0 | 13.5 | 12.9 |
| Total | 1,798 | 242,648 | 100.0 | 49,033 | 21.3 | 15.5 | 8.7 | 18.0 | 23.4 | 21.5 | 21.7 | 23.7 | 22.8 | 39.0 | 28.9 | 34.6 | 0.0 | 8.5 | 12.3 |

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Appleton MSA | 40 | 1,586 | 2.6 | 718 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 87.3 | 100.0 | 85.1 | 12.7 | 0.0 | 14.9 | 0.0 | 0.0 | 0.0 |
| Fond du Lac MSA | 684 | 56,838 | 44.7 | 1,806 | 9.0 | 5.7 | 6.5 | 5.2 | 2.6 | 2.9 | 78.2 | 84.1 | 81.7 | 7.6 | 7.6 | 8.8 | 0.0 | 0.0 | 0.0 |
| Madison MSA | 68 | 3,021 | 4.4 | 981 | 0.0 | 0.0 | 0.0 | 32.8 | 2.9 | 24.3 | 67.2 | 97.1 | 75.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Milwaukee MSA | 276 | 45,961 | 18.0 | 33,602 | 12.5 | 8.0 | 11.5 | 13.0 | 11.2 | 11.8 | 34.5 | 51.4 | 33.6 | 39.9 | 28.6 | 43.1 | 0.0 | 0.7 | 0.0 |
| Non-MSA | 321 | 21,763 | 21.0 | 2,004 | 0.0 | 0.0 | 0.0 | 2.8 | 0.0 | 1.7 | 83.3 | 85.0 | 81.9 | 13.9 | 15.0 | 16.4 | 0.0 | 0.0 | 0.0 |
| Oshkosh MSA | 45 | 3,892 | 2.9 | 2,632 | 0.0 | 0.0 | 0.0 | 18.2 | 8.9 | 17.0 | 56.1 | 73.3 | 54.1 | 25.7 | 17.8 | 29.0 | 0.0 | 0.0 | 0.0 |
| Sheboygan MSA | 96 | 9,691 | 6.3 | 1,944 | 0.0 | 0.0 | 0.0 | 16.2 | 4.2 | 15.9 | 68.4 | 80.2 | 67.1 | 15.4 | 15.6 | 16.9 | 0.0 | 0.0 | 0.0 |
| Total | 1,530 | 142,752 | 100.0 | 43,687 | 9.5 | 4.0 | 9.1 | 12.9 | 3.9 | 11.6 | 44.5 | 78.8 | 42.4 | 33.1 | 13.2 | 37.0 | 0.0 | 0.1 | 0.0 |

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Appleton MSA | 35 | 3,400 | 2.4 | 694 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 71.3 | 100.0 | 61.5 | 28.7 | 0.0 | 38.5 | 0.0 | 0.0 | 0.0 |
| Fond du Lac MSA | 605 | 82,481 | 41.4 | 1,505 | 0.0 | 0.0 | 0.0 | 19.7 | 14.5 | 18.4 | 63.5 | 68.8 | 63.7 | 16.8 | 16.7 | 17.9 | 0.0 | 0.0 | 0.0 |
| Madison MSA | 49 | 5,693 | 3.3 | 967 | 0.0 | 0.0 | 0.0 | 30.6 | 32.7 | 33.0 | 69.4 | 67.3 | 67.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Milwaukee MSA | 384 | 62,241 | 26.2 | 31,763 | 11.6 | 5.5 | 8.0 | 16.2 | 20.1 | 14.7 | 33.3 | 44.3 | 34.2 | 38.1 | 29.7 | 42.6 | 0.7 | 0.5 | 0.5 |
| Non-MSA | 289 | 32,841 | 19.8 | 1,953 | 0.0 | 0.0 | 0.0 | 6.8 | 1.0 | 5.9 | 77.7 | 84.8 | 77.1 | 15.5 | 14.2 | 16.9 | 0.0 | 0.0 | 0.0 |
| Oshkosh MSA | 16 | 1,685 | 1.1 | 2,488 | 0.0 | 0.0 | 0.0 | 16.2 | 6.3 | 14.1 | 63.1 | 75.0 | 64.4 | 16.0 | 18.8 | 17.3 | 4.7 | 0.0 | 4.1 |
| Sheboygan MSA | 85 | 13,211 | 5.8 | 1,881 | 0.0 | 0.0 | 0.0 | 6.6 | 3.5 | 7.4 | 72.2 | 72.9 | 71.0 | 21.2 | 23.5 | 21.5 | 0.0 | 0.0 | 0.0 |
| Total | 1,463 | 201,552 | 100.0 | 41,251 | 8.7 | 1.4 | 6.1 | 15.6 | 12.9 | 14.2 | 42.5 | 66.5 | 42.0 | 32.4 | 19.1 | 36.9 | 0.9 | 0.1 | 0.7 |

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2021 |
|---|--|----------------|-------------------|-----------------------|---|---------------------|------------------|--|---------------------|---|---------------------|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| NEBAT Appleton MSA 2021 | 40 | 1,586 | 2.6 | 718 | 78.9 | 87.5 | 58.2 | 5.9 | 12.5 | 15.2 | 0.0 |
| NEBAT Fond du Lac MSA 2021 | 684 | 56,838 | 44.7 | 1,806 | 78.9 | 75.1 | 60.7 | 6.8 | 24.9 | 14.4 | 0.0 |
| NEBAT Madison MSA 2021 | 68 | 3,021 | 4.4 | 981 | 79.9 | 94.1 | 59.3 | 5.7 | 5.9 | 14.3 | 0.0 |
| NEBAT Milwaukee MSA 2021 | 276 | 45,961 | 18.0 | 33,602 | 80.6 | 66.3 | 51.3 | 7.9 | 33.7 | 11.5 | 0.0 |
| NEBAT Non MSA 2021 | 321 | 21,763 | 21.0 | 2,004 | 79.9 | 81.0 | 57.1 | 5.9 | 19.0 | 14.1 | 0.0 |
| NEBAT Oshkosh MSA 2021 | 45 | 3,892 | 2.9 | 2,632 | 78.0 | 84.4 | 53.5 | 7.1 | 15.6 | 14.9 | 0.0 |
| NEBAT Sheboygan MSA 2021 | 96 | 9,691 | 6.3 | 1,944 | 78.6 | 76.0 | 57.0 | 7.6 | 24.0 | 13.8 | 0.0 |
| Total | 1,530 | 142,752 | 100.0 | 43,687 | 80.1 | 76.3 | 52.7 | 7.6 | 23.7 | 12.3 | 0.0 |
| <i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | |

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2022-23 | |
|--|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| NEBAT Appleton MSA 2023 | 35 | 3,400 | 2.4 | 694 | 87.7 | 71.4 | 56.6 | 3.4 | 28.6 | 8.8 | 0.0 | |
| NEBAT Fond du Lac MSA 2023 | 605 | 82,481 | 41.4 | 1,505 | 85.2 | 62.6 | 54.6 | 4.3 | 37.4 | 10.4 | 0.0 | |
| NEBAT Madison MSA 2023 | 49 | 5,693 | 3.3 | 967 | 87.3 | 83.7 | 59.8 | 2.9 | 16.3 | 9.8 | 0.0 | |
| NEBAT Milwaukee MSA 2023 | 384 | 62,241 | 26.2 | 31,763 | 88.0 | 69.0 | 53.2 | 4.2 | 31.0 | 7.8 | 0.0 | |
| NEBAT Non MSA 2023 | 289 | 32,841 | 19.8 | 1,953 | 86.3 | 73.4 | 56.3 | 3.8 | 26.6 | 9.8 | 0.0 | |
| NEBAT Oshkosh MSA 2023 | 16 | 1,685 | 1.1 | 2,488 | 85.1 | 81.3 | 53.9 | 4.4 | 18.8 | 10.4 | 0.0 | |
| NEBAT Sheboygan MSA 2023 | 85 | 13,211 | 5.8 | 1,881 | 85.3 | 69.4 | 55.5 | 4.9 | 30.6 | 9.8 | 0.0 | |
| Total | 1,463 | 201,552 | 100.0 | 41,251 | 87.5 | 67.9 | 53.8 | 4.2 | 32.1 | 8.3 | 0.0 | |
| <i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | | |

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|----------------------------|----------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| NEBAT Appleton MSA 2021 | 2 | 85 | 0.9 | 86 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 93.0 | 100.0 | 97.7 | 7.0 | 0.0 | 2.3 | 0.0 | 0.0 | 0.0 |
| NEBAT Fond du Lac MSA 2021 | 79 | 6,078 | 36.2 | 179 | 0.7 | 0.0 | 0.0 | 0.9 | 0.0 | 0.0 | 87.7 | 91.1 | 87.2 | 10.7 | 8.9 | 12.8 | 0.0 | 0.0 | 0.0 |
| NEBAT Madison MSA 2021 | 17 | 1,944 | 7.8 | 89 | 0.0 | 0.0 | 0.0 | 11.1 | 0.0 | 10.1 | 88.9 | 100.0 | 89.9 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| NEBAT Milwaukee MSA 2021 | 4 | 335 | 1.8 | 170 | 7.3 | 0.0 | 5.3 | 8.5 | 0.0 | 5.9 | 36.6 | 75.0 | 29.4 | 47.7 | 25.0 | 59.4 | 0.0 | 0.0 | 0.0 |
| NEBAT Non MSA 2021 | 97 | 10,030 | 44.5 | 307 | 0.0 | 0.0 | 0.0 | 0.8 | 0.0 | 0.3 | 81.3 | 77.3 | 80.8 | 17.9 | 22.7 | 18.9 | 0.0 | 0.0 | 0.0 |
| NEBAT Oshkosh MSA 2021 | 0 | 0 | 0.0 | 60 | 0.0 | 0.0 | 0.0 | 6.4 | 0.0 | 0.0 | 66.7 | 0.0 | 75.0 | 26.9 | 0.0 | 25.0 | 0.0 | 0.0 | 0.0 |
| NEBAT Sheboygan MSA 2021 | 19 | 2,157 | 8.7 | 124 | 0.0 | 0.0 | 0.0 | 3.3 | 0.0 | 1.6 | 73.1 | 57.9 | 74.2 | 23.7 | 42.1 | 24.2 | 0.0 | 0.0 | 0.0 |
| Total | 218 | 20,629 | 100.0 | 1,015 | 3.1 | 0.0 | 0.9 | 5.5 | 0.0 | 2.2 | 62.6 | 82.6 | 74.4 | 28.8 | 17.4 | 22.6 | 0.0 | 0.0 | 0.0 |

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|----------------------------|----------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| NEBAT Appleton MSA 2023 | 2 | 40 | 0.6 | 87 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 83.2 | 100.0 | 92.0 | 16.8 | 0.0 | 8.0 | 0.0 | 0.0 | 0.0 |
| NEBAT Fond du Lac MSA 2023 | 114 | 10,115 | 32.9 | 222 | 0.0 | 0.0 | 0.0 | 4.1 | 0.0 | 0.9 | 74.0 | 81.6 | 77.9 | 21.9 | 18.4 | 21.2 | 0.0 | 0.0 | 0.0 |
| NEBAT Madison MSA 2023 | 35 | 3,114 | 10.1 | 109 | 0.0 | 0.0 | 0.0 | 18.9 | 20.0 | 24.8 | 81.1 | 80.0 | 75.2 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| NEBAT Milwaukee MSA 2023 | 5 | 289 | 1.4 | 176 | 8.3 | 0.0 | 0.6 | 11.0 | 0.0 | 2.3 | 35.2 | 80.0 | 30.1 | 45.3 | 20.0 | 67.0 | 0.2 | 0.0 | 0.0 |
| NEBAT Non MSA 2023 | 158 | 14,570 | 45.5 | 281 | 0.0 | 0.0 | 0.0 | 3.7 | 0.0 | 2.5 | 76.5 | 74.1 | 76.2 | 19.9 | 25.9 | 21.4 | 0.0 | 0.0 | 0.0 |
| NEBAT Oshkosh MSA 2023 | 2 | 92 | 0.6 | 73 | 0.0 | 0.0 | 0.0 | 7.8 | 0.0 | 2.7 | 64.6 | 100.0 | 61.6 | 26.2 | 0.0 | 35.6 | 1.4 | 0.0 | 0.0 |
| NEBAT Sheboygan MSA 2023 | 31 | 2,369 | 8.9 | 159 | 0.0 | 0.0 | 0.0 | 1.3 | 0.0 | 0.6 | 77.1 | 83.9 | 76.1 | 21.6 | 16.1 | 23.3 | 0.0 | 0.0 | 0.0 |
| Total | 347 | 30,589 | 100.0 | 1,107 | 3.9 | 0.0 | 0.1 | 8.2 | 2.0 | 3.9 | 56.9 | 78.4 | 69.4 | 30.9 | 19.6 | 26.6 | 0.2 | 0.0 | 0.0 |

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2021 |
|--|----------------------|---------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans |
| NEBAT Appleton MSA 2021 | 2 | 85 | 0.9 | 86 | 95.2 | 100.0 | 54.7 | 3.0 | 0.0 | 1.7 | 0.0 |
| NEBAT Fond du Lac MSA 2021 | 79 | 6,078 | 36.2 | 179 | 94.4 | 98.7 | 68.2 | 4.9 | 1.3 | 0.7 | 0.0 |
| NEBAT Madison MSA 2021 | 17 | 1,944 | 7.8 | 89 | 96.4 | 100.0 | 47.2 | 2.0 | 0.0 | 1.7 | 0.0 |
| NEBAT Milwaukee MSA 2021 | 4 | 335 | 1.8 | 170 | 93.7 | 100.0 | 62.9 | 4.3 | 0.0 | 2.0 | 0.0 |
| NEBAT Non MSA 2021 | 97 | 10,030 | 44.5 | 307 | 95.4 | 94.8 | 58.3 | 3.5 | 5.2 | 1.0 | 0.0 |
| NEBAT Oshkosh MSA 2021 | -- | -- | -- | 60 | 97.3 | -- | 56.7 | 2.4 | -- | 0.3 | -- |
| NEBAT Sheboygan MSA 2021 | 19 | 2,157 | 8.7 | 124 | 92.8 | 84.2 | 56.5 | 6.3 | 15.8 | 0.9 | 0.0 |
| Total | 218 | 20,629 | 100.0 | 1,015 | 94.6 | 95.9 | 59.2 | 3.9 | 4.1 | 1.4 | 0.0 |
| <i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | |

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2022-23 |
|--|----------------------|---------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans |
| NEBAT Appleton MSA 2023 | 2 | 40 | 0.6 | 87 | 96.8 | 100.0 | 41.4 | 1.6 | 0.0 | 1.6 | 0.0 |
| NEBAT Fond du Lac MSA 2023 | 114 | 10,115 | 32.9 | 222 | 95.9 | 93.9 | 60.4 | 3.6 | 6.1 | 0.5 | 0.0 |
| NEBAT Madison MSA 2023 | 35 | 3,114 | 10.1 | 109 | 97.1 | 100.0 | 44.0 | 1.3 | 0.0 | 1.7 | 0.0 |
| NEBAT Milwaukee MSA 2023 | 5 | 289 | 1.4 | 176 | 95.6 | 100.0 | 65.9 | 2.5 | 0.0 | 1.9 | 0.0 |
| NEBAT Non MSA 2023 | 158 | 14,570 | 45.5 | 281 | 96.7 | 91.1 | 53.7 | 2.6 | 8.9 | 0.8 | 0.0 |
| NEBAT Oshkosh MSA 2023 | 2 | 92 | 0.6 | 73 | 98.0 | 100.0 | 47.9 | 1.6 | 0.0 | 0.4 | 0.0 |
| NEBAT Sheboygan MSA 2023 | 31 | 2,369 | 8.9 | 159 | 95.8 | 96.8 | 45.9 | 3.8 | 3.2 | 0.4 | 0.0 |
| Total | 347 | 30,589 | 100.0 | 1,107 | 96.2 | 93.7 | 53.6 | 2.5 | 6.3 | 1.3 | 0.0 |
| <i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | |

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.