



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

June 3, 2024

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hiawatha National Bank  
Charter Number 15698

N1555 770<sup>th</sup> Street  
Hager City, WI 54014

Office of the Comptroller of the Currency

222 South Ninth Street, Suite 800  
Minneapolis, MN 55402

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

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## Overall CRA Rating

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

**The lending test is rated: Outstanding**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- A majority of loans are originated inside the bank's assessment areas (AA).
- Hiawatha National Bank (HNB) exhibits adequate responsiveness to AA needs through community development (CD) loans, qualified investments, and CD services.
- HNB demonstrated excellent dispersion of loans across geographies of different income levels.
- HNB demonstrated excellent distribution of loans to businesses of different sizes and borrowers of different income levels.
- HNB's loan-to-deposit ratio (LTD) is more than reasonable given the bank's size, financial condition, and credit needs of the AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable. HNB's net LTD ratio averaged 86.41 percent over the 12 quarters from March 31, 2020 through December 31, 2022. The bank's quarterly LTD ratio ranged from a low of 68.71 percent in the third quarter of 2021 to a high of 115.26 percent in the second quarter of 2020. HNB ranks first among four similarly situated banks for average LTD. Similarly situated banks include those operating in or near the bank's AAs with similar asset sizes.

| Loan to Deposit Ratio Institution (Headquarters) | Assets as of 12/31/2022<br>(\$000s) | Average LTD Ratio<br>(%) |
|--|-------------------------------------|--------------------------|
| <b>Hiawatha National Bank (Hager City, WI)</b>   | <b>634,681</b>                      | <b>86.41</b>             |
| First State Bank (New London, WI)                | 331,547                             | 76.73                    |
| Security Financial Bank (Durand, WI)             | 828,402                             | 76.36                    |
| Dairy State Bank (Rice Lake, WI)                 | 705,542                             | 41.71                    |

Source: Call Report data from March 31, 2020 through December 31, 2022.

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 66 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.

| Lending Inside and Outside of the Assessment Area |                 |    |         |    |            |                                 |    |             |    |                   |
|---|-----------------|----|---------|----|------------|---------------------------------|----|-------------|----|-------------------|
| Loan Category                                     | Number of Loans |    |         |    | Total<br># | Dollar Amount of Loans \$(000s) |    |             |    | Total<br>\$(000s) |
|   | Inside          |    | Outside |    |            | Inside                          |    | Outside     |    |                   |
|   | #               | %  | #       | %  |            | \$                              | %  | \$          | %  |                   |
| Home Mortgage                                     | 767             | 67 | 383     | 33 | 835        | 172,396,723                     | 61 | 110,239,327 | 39 | 282,636,050       |
| Small Business                                    | 68              | 57 | 52      | 43 | 435        | 26,760,823                      | 38 | 43,347,901  | 62 | 70,108,724        |
| Total   | 835             | 66 | 435     | 34 | 1270       | 199,157,546                     | 57 | 153,587,228 | 44 | 352,744,774       |

Source: OCC Loan Sample, bank reported 2020-2022 HMDA data.

## Description of Institution

HNB is a single-state, national bank chartered in Hager City, Wisconsin. As of December 31, 2022, the bank had total assets of \$634.7 million. HNB is entirely owned by Lake Shore III Corporation, a single bank holding company located in Glenwood City, WI. The bank has a main office in Hager City, two branches in Hudson, and branches in Maiden Rock, Glenwood City, Osceola, and Plymouth, WI. The bank also has a Loan Production Office (LPO) in Eau Claire, WI. In addition to the branch locations, the bank operates three non-deposit taking automated teller machines (ATMs) in Hager City, Maiden Rock, and a grocery store in Glenwood City.

Since the previous CRA evaluation, the bank opened a full-service branch in Plymouth, WI in March 2020, which expanded the bank's AA to include the Sheboygan Metropolitan Statistical Area (MSA). HNB also merged with affiliate First American Bank, N.A. in August 2020. This merger resulted in the addition of one branch in Hudson, WI but did not impact the bank's AA.

HNB operates with one rating area and three AAs. The bank rating area is the state of Wisconsin, and the AAs are the MN-WI MSA AA, Sheboygan MSA AA, and the WI Non-MSA AA. The MN-WI MSA AA consists of the counties of St. Croix and Pierce, in western WI. The counties are part of the Minneapolis-St. Paul-Bloomington, MN-WI MSA and are served by branches in Hudson, Glenwood City, Maiden Rock, and Hager City. The Sheboygan MSA AA consists of Sheboygan County, in eastern WI and is served by the Plymouth branch. The WI Non-MSA AA consists of Dunn, Pepin, and Polk counties in western WI and is served primarily by the Osceola branch.

HNB offers a variety of traditional products and services for commercial and retail banking customers. Deposit products include checking and savings accounts, certificates of deposit, health savings accounts, and retirement savings accounts. Loan products include fixed- and adjustable-rate mortgages, vehicle loans, personal and business lines of credit, commercial real estate, and agriculture loans. The bank's lending focuses are business and home mortgage products. As of December 31, 2022, net loans and leases totaled \$441.7 million or 69.6 percent of total assets. By dollar volume, the loan portfolio comprises 73.6 percent real estate loans, 24.0 percent commercial loans, 1.7 percent agricultural loans, and 0.7 percent individual loans. Tier one capital represents 11.1 percent of risk-weighted assets.

The bank received a Satisfactory rating at prior CRA evaluation dated February 3, 2020. There are no financial, legal, or other factors that impede the bank's ability to meet its CRA obligations.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Lending Test evaluation period is January 1, 2020, through December 31, 2022. The evaluation was conducted using Small Bank CRA examination procedures with Intermediate Small Bank CRA performance standards considered for the portion of the evaluation period between January 1, 2022, through December 31, 2022. HNB transitioned to Intermediate Small Bank (ISB) requirements effective January 1, 2022, based on asset size as of December 31, 2020, and December 31, 2021.

We relied on Home Mortgage Disclosure Act (HMDA) data to assess home mortgage loans. We also reviewed a sample of business loans originated within each AA. These products were determined through an analysis of the bank's lending activity, including the dollar and number of loan originations and purchases during the evaluation period. We also reviewed all CD loans, investments, and services submitted by bank management as part of the evaluation.

We analyzed the distribution of loans by income level of the borrower and geography for activity occurring in 2020 and 2021 separate from activity occurring in 2022 because of changes in the demographic comparative data. Activity occurring in 2020 and 2021 was compared to 2015 American Community Survey (ACS) data and 2021 Dun & Bradstreet (D&B) data. Activity occurring in 2022 was compared to 2020 United States (U.S.) Census data and 2022 D&B data.

We also reviewed the financial, economic, and environmental factors of the AAs to determine the bank's lending performance. We contacted two community members with knowledge of the economic conditions and demographics to gather additional insight on lending needs and opportunities in the AAs.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs 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 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

Given HNB is an intrastate institution, all weight was applied to the bank's performance in the State of Wisconsin. The state rating is based on performance in all bank AAs. AA weighting was determined based on deposit activity as of June 30, 2022, and lending activity by number and dollar volume during the evaluation period. The bank's performance in the MN-WI MSA AA received more weight in determining conclusions as it holds 81.0 percent of the bank's deposits and 72.6 percent of the bank's lending activity. The Sheboygan MSA and WI Non-MSA AAs were weighted equally and received less consideration. The Sheboygan MSA AA holds 8.0 percent of the bank's deposits and 19.6 percent of the

bank's lending activity, and the WI Non-MSA AA holds 11.1 percent of the bank's deposits and 7.8 percent of the bank's lending activity.

Refer to the "Scope" section under State Rating section for details regarding how the products were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Wisconsin

**CRA rating for the State of Wisconsin:** Satisfactory

**The Lending Test is rated:** Outstanding

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The distribution of loans to small businesses and home mortgage loans across geographies of different income levels is excellent.
- The distribution of loans to small businesses and borrowers of different income levels is excellent.
- The bank exhibits adequate responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services.

### Description of Institution's Operations in Wisconsin

Wisconsin includes all of the bank's branches and operations. HNB operates seven branches, three cash-dispensing ATMs, and one LPO in the State of Wisconsin. The bank operates in three AAs in the State of Wisconsin: MN-WI MSA AA, Sheboygan MSA AA, and WI Non-MSA AA.

Product and service offerings are consistent across AAs. The bank's business strategy focuses on serving the local community as a traditional community bank. Small loans to businesses and home mortgage loans are the primary products offered at all branches and served as the primary products analyzed during this evaluation.

#### MN-WI MSA AA

The MN-WI MSA AA includes Pierce and St. Croix counties in Wisconsin. HNB includes all census tracts (CT) in both counties. HNB operates five branches and three cash-dispensing ATMs in the AA. HNB operates two branches in Hudson, one branch in Hager City, one branch in Maiden Rock, and one branch in Glenwood City. One ATM is located at the Hager City branch, one ATM is located at the Maiden Rock branch, and one ATM is located at a local grocery store in Glenwood City.

The MN-WI MSA AA accounted for 81.0 percent of HNB's deposits as of June 30, 2022 and 72.6 percent of the bank's loans originated during the evaluation period, excluding loans originated at the bank's LPO. The primary lending products in the AA are business and home mortgage given the bank's diverse operations in the urban and suburban communities served. Competition in the Hudson area of the AA is strong and includes local community banks, regional, and national banks. As of June 30, 2022, there were 15 financial institutions with 34 offices in the AA, not including credit unions. HNB accounted for 14.4 percent of total deposits and ranked second in deposit market share in the AA. HNB's branches are the only banks in the small towns of Glenwood City, Maiden Rock, and Hager City.

We completed one community contact in the MN-WI MSA AA. We conducted a telephone interview with a senior director of a county organization focused on affordable housing in Pierce County. The community contact noted the need for affordable housing in the area, particularly as home prices and

rents have increased over the last five years. There are no negative perceptions towards financial institutions in the area and the community contact noted that institutions are involved in the community.

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2020-2021 MN-WI MSA AA</b>   |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 22       | 0.0                   | 18.2                         | 72.7                     | 9.1                     | 0.0                   |
| Population by Geography  | 126,917  | 0.0                   | 17.2                         | 75.2                     | 7.6                     | 0.0                   |
| Housing Units by Geography   | 50,688   | 0.0                   | 18.2                         | 75.3                     | 6.5                     | 0.0                   |
| Owner-Occupied Units by Geography  | 35,992   | 0.0                   | 15.1                         | 76.7                     | 8.1                     | 0.0                   |
| Occupied Rental Units by Geography   | 11,644   | 0.0                   | 28.0                         | 70.0                     | 2.0                     | 0.0                   |
| Vacant Units by Geography  | 3,052    | 0.0                   | 17.1                         | 79.4                     | 3.5                     | 0.0                   |
| Businesses by Geography  | 8,074    | 0.0                   | 17.3                         | 74.1                     | 8.6                     | 0.0                   |
| Farms by Geography   | 769      | 0.0                   | 15.6                         | 76.3                     | 8.1                     | 0.0                   |
| Family Distribution by Income Level  | 34,195   | 19.4                  | 20.0                         | 25.1                     | 35.5                    | 0.0                   |
| Household Distribution by Income Level   | 47,636   | 22.2                  | 17.1                         | 20.6                     | 40.1                    | 0.0                   |
| Median Family Income MSA - 33460<br>Minneapolis-St. Paul-Bloomington, MN-<br>WI MSA  |          | \$84,589              | Median Housing Value         |                          |                         | \$202,068             |
|  |          |                       | Median Gross Rent            |                          |                         | \$839                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 5.0%                  |
| <i>Source: 2015 ACS and 2021 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |



| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2022 MN-WI MSA AA</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 26       | 0.0                   | 19.2                         | 73.1                     | 7.7                     | 0.0                   |
| Population by Geography  | 135,748  | 0.0                   | 16.8                         | 76.3                     | 6.9                     | 0.0                   |
| Housing Units by Geography   | 53,068   | 0.0                   | 17.4                         | 76.7                     | 6.0                     | 0.0                   |
| Owner-Occupied Units by Geography  | 38,229   | 0.0                   | 16.8                         | 75.4                     | 7.8                     | 0.0                   |
| Occupied Rental Units by Geography   | 12,310   | 0.0                   | 17.1                         | 81.7                     | 1.2                     | 0.0                   |
| Vacant Units by Geography  | 2,529    | 0.0                   | 27.3                         | 71.6                     | 1.1                     | 0.0                   |
| Businesses by Geography  | 10,317   | 0.0                   | 17.2                         | 74.4                     | 8.5                     | 0.0                   |
| Farms by Geography   | 877      | 0.0                   | 31.1                         | 62.9                     | 5.9                     | 0.0                   |
| Family Distribution by Income Level  | 35,357   | 18.7                  | 21.2                         | 27.9                     | 32.2                    | 0.0                   |
| Household Distribution by Income Level   | 50,539   | 21.4                  | 18.0                         | 21.6                     | 39.1                    | 0.0                   |
| Median Family Income MSA - 33460<br>Minneapolis-St. Paul-Bloomington, MN-<br>WI MSA  |          | \$103,977             | Median Housing Value         |                          |                         | \$252,987             |
|  |          |                       | Median Gross Rent            |                          |                         | \$971                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 3.3%                  |
| <i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

### Sheboygan MSA AA

The Sheboygan MSA AA consists of Sheboygan County, Wisconsin. HNB includes all CTs in the MSA. HNB operates one branch and no ATMs in the AA. The bank's branch is located in Plymouth, WI, a town with a population of less than 10,000. The HNB branch is approximately 13 miles from downtown Sheboygan, a city with a population of nearly 50,000. HNB opened the branch in March 2020 after operating as an LPO in Sheboygan for several years.

The Sheboygan MSA AA accounted for 8.0 percent of HNB's deposits as of June 30, 2022, and 19.6 percent of the bank's loans originated during the evaluation period, excluding loans originated at the bank's LPO. The primary lending products in the AA are business and home mortgage. Competition in the AA is strong and includes local community banks, regional, and national banks. As of June 30, 2022, there were 15 financial institutions with 33 offices in the AA, not including credit unions. HNB accounted for 1.3 percent of total deposits and ranked 14<sup>th</sup> in deposit market share in the AA.

We completed one community contact in the Sheboygan MSA AA. We conducted a telephone interview with a senior director of a local organization promoting growth in the Sheboygan MSA. The community contact noted that growth in the area slowed as the use of COVID-19 relief funds and grants tapered off toward the end of the evaluation period. The contact noted that traditional credit needs in the area are met but noted opportunities to fund start-up businesses. There are no negative perceptions towards financial institutions in the area, and the community contact noted that institutions are involved in the community.

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2020-2021 Sheboygan MSA AA</b>   |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 27       | 0.0                   | 14.8                         | 66.7                     | 14.8                    | 3.7                   |
| Population by Geography  | 115,226  | 0.0                   | 13.0                         | 72.2                     | 14.8                    | 0.0                   |
| Housing Units by Geography   | 50,648   | 0.0                   | 13.7                         | 73.5                     | 12.9                    | 0.0                   |
| Owner-Occupied Units by Geography  | 33,009   | 0.0                   | 7.7                          | 76.3                     | 15.9                    | 0.0                   |
| Occupied Rental Units by Geography   | 13,692   | 0.0                   | 26.2                         | 67.2                     | 6.7                     | 0.0                   |
| Vacant Units by Geography  | 3,947    | 0.0                   | 20.0                         | 71.2                     | 8.8                     | 0.0                   |
| Businesses by Geography  | 5,817    | 0.0                   | 16.2                         | 68.4                     | 15.4                    | 0.0                   |
| Farms by Geography   | 334      | 0.0                   | 3.3                          | 73.1                     | 23.7                    | 0.0                   |
| Family Distribution by Income Level  | 30,905   | 17.7                  | 18.4                         | 25.6                     | 38.3                    | 0.0                   |
| Household Distribution by Income Level   | 46,701   | 22.1                  | 16.9                         | 20.8                     | 40.2                    | 0.0                   |
| Median Family Income MSA - 43100<br>Sheboygan, WI MSA  |          | \$66,599              | Median Housing Value         |                          |                         | \$146,406             |
|  |          |                       | Median Gross Rent            |                          |                         | \$664                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 6.8%                  |
| <i>Source: 2015 ACS and 2021 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2022 Sheboygan MSA AA</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 29       | 0.0                   | 6.9                          | 72.4                     | 17.2                    | 3.4                   |
| Population by Geography  | 118,034  | 0.0                   | 7.6                          | 72.9                     | 19.5                    | 0.0                   |
| Housing Units by Geography   | 51,249   | 0.0                   | 7.9                          | 74.1                     | 18.0                    | 0.0                   |
| Owner-Occupied Units by Geography  | 33,556   | 0.0                   | 3.9                          | 73.9                     | 22.1                    | 0.0                   |
| Occupied Rental Units by Geography   | 14,198   | 0.0                   | 15.5                         | 75.5                     | 9.0                     | 0.0                   |
| Vacant Units by Geography  | 3,495    | 0.0                   | 15.3                         | 70.2                     | 14.6                    | 0.0                   |
| Businesses by Geography  | 7,293    | 0.0                   | 6.6                          | 73.1                     | 20.3                    | 0.0                   |
| Farms by Geography   | 403      | 0.0                   | 1.7                          | 75.9                     | 22.3                    | 0.0                   |
| Family Distribution by Income Level  | 30,134   | 15.6                  | 20.6                         | 24.7                     | 39.1                    | 0.0                   |
| Household Distribution by Income Level   | 47,754   | 20.5                  | 18.5                         | 20.8                     | 40.1                    | 0.0                   |
| Median Family Income MSA - 43100<br>Sheboygan, WI MSA  |          | \$76,845              | Median Housing Value         |                          |                         | \$163,530             |
|  |          |                       | Median Gross Rent            |                          |                         | \$751                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 3.8%                  |
| <i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

WI Non-MSA AA

The WI Non-MSA AA consists of Polk, Dunn, and Pepin counties in Wisconsin. HNB includes all CTs in the counties. HNB operates one branch and no ATMs in the AA. The bank's branch is located in Osceola, WI. The bank's Osceola branch serves Polk County, and branches in Glenwood City and Maiden Rock, located in the MN-WI MSA AA, serve Dunn and Pepin counties, respectively.

The WI Non-MSA AA accounted for 11.1 percent of HNB's deposits as of June 30, 2022, and 7.8 percent of the bank's loans originated during the evaluation period, excluding loans originated at the bank's LPO. The primary lending products in the AA are business and home mortgage. Competition in the AA is strong and includes local community banks, regional, and national banks. As of June 30, 2022, there were 20 financial institutions with 29 offices in the AA, not including credit unions. HNB accounted for 3.2 percent of total deposits and ranked ninth in deposit market share in the AA. The top three financial institutions in the AA in terms of deposit market share represent approximately 50 percent of the deposit market share.

| <b>Table A – Demographic Information of the Assessment Area</b> |          |                       |                              |                          |                         |                       |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2020-2021 WI Non-MSA AA</b>                 |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>                              | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)                                     | 20       | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Population by Geography   | 95,103   | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Housing Units by Geography                                      | 45,932   | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Owner-Occupied Units by Geography                               | 27,385   | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Occupied Rental Units by Geography                              | 10,004   | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Vacant Units by Geography                                       | 8,543    | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Businesses by Geography   | 5,585    | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Farms by Geography  | 789      | 0.0                   | 0.0                          | 100.0                    | 0.0                     | 0.0                   |
| Family Distribution by Income Level                             | 24,802   | 17.6                  | 19.5                         | 22.8                     | 40.1                    | 0.0                   |
| Household Distribution by Income Level                          | 37,389   | 21.7                  | 16.9                         | 18.6                     | 42.8                    | 0.0                   |
| Median Family Income Non-MSAs - WI                              |          | \$60,742              | Median Housing Value         |                          |                         | \$153,042             |
|   |          |                       | Median Gross Rent            |                          |                         | \$701                 |
|   |          |                       | Families Below Poverty Level |                          |                         | 7.4%                  |

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

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2022 WI Non-MSA AA</b>   |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 25       | 4.0                   | 4.0                          | 88.0                     | 4.0                     | 0.0                   |
| Population by Geography  | 97,735   | 2.9                   | 2.3                          | 91.7                     | 3.1                     | 0.0                   |
| Housing Units by Geography   | 47,050   | 0.9                   | 4.3                          | 90.5                     | 4.3                     | 0.0                   |
| Owner-Occupied Units by Geography  | 28,880   | 0.0                   | 2.8                          | 93.3                     | 3.9                     | 0.0                   |
| Occupied Rental Units by Geography   | 10,018   | 4.0                   | 2.8                          | 92.2                     | 1.1                     | 0.0                   |
| Vacant Units by Geography  | 8,152    | 0.1                   | 11.7                         | 78.4                     | 9.9                     | 0.0                   |
| Businesses by Geography  | 7,148    | 2.2                   | 2.9                          | 92.1                     | 2.8                     | 0.0                   |
| Farms by Geography   | 881      | 0.0                   | 2.5                          | 93.8                     | 3.7                     | 0.0                   |
| Family Distribution by Income Level  | 24,713   | 17.3                  | 17.7                         | 23.1                     | 41.9                    | 0.0                   |
| Household Distribution by Income Level   | 38,898   | 22.2                  | 15.3                         | 18.7                     | 43.8                    | 0.0                   |
| Median Family Income Non-MSAs - WI   |          | \$71,740              | Median Housing Value         |                          |                         | \$172,544             |
|  |          |                       | Median Gross Rent            |                          |                         | \$789                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 5.9%                  |
| <i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

## Scope of Evaluation in Wisconsin

We completed a full-scope review of all three AAs. The State of Wisconsin rating is weighted most heavily on the MN-WI MSA AA, which accounted for the largest portion of deposits and lending activity during the evaluation period. The Sheboygan MSA and WI Non-MSA AAs were weighted equally and received less consideration. The 2020 and 2021 evaluation period received the most weight as this time period accounted for the majority of loan originations and purchases.

Within each AA, we analyzed small business loans and home mortgage loans. Small business loans represented the largest portion of lending activity in the MN-WI MSA and Sheboygan MSA AAs. Therefore, business loans received the most weight when determining Lending Test conclusions for these AAs. Business loans by total number within each AA represented 59 percent for the MN-WI MSA and 70 percent for the Sheboygan MSA. Business loans and home mortgage loans were equally weighted in the WI Non-MSA AA. Business loans represented 60 percent by dollar volume and 18 percent by number of lending activity, and home mortgage loans represented 35 percent by dollar volume and 72 percent by number of lending activity in the WI Non-MSA AA. Refer to Appendix A for more information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

### LENDING TEST

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

#### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Wisconsin is excellent.

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

The bank exhibits excellent geographic distribution of loans in the state.

##### *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.

##### MN WI MSA AA

The distribution of home mortgage loans to individuals in different income level CTs is reasonable for the 2020 and 2021 evaluation period. The percentage of home mortgage loans made in moderate-income CTs was near to the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. The AA did not have any low-income CTs in 2020 and 2021.

The distribution of home mortgage loans to individuals in different income level CTs AA is excellent for the 2022 evaluation period. The percentage of home mortgage loans made in moderate-income CTs exceeded the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. The AA did not have any low-income CTs in 2022.

##### Sheboygan MSA AA

The distribution of home mortgage loans to individuals in different income level CTs is poor for the 2020 and 2021 evaluation period. Management did not originate any home mortgage loans in moderate-income CTs during this period. Performance was well below demographic data and the aggregate percentage of all reporting lenders. The AA did not have any low-income CTs.

An analysis of the distribution of home mortgage loans to individuals in different income level CTs was not completed for 2022 as the bank did not have enough lending activity in the AA to provide a meaningful analysis. The bank only made six home mortgage loans in the AA.

##### WI Non-MSA AA

An analysis of the distribution of home mortgage loans to individuals in different income level CTs was not completed for 2020 and 2021 as the AA did not have any low- or moderate-income CTs in 2020 and 2021.

The distribution of home mortgage loans to individuals in different income level CTs is excellent for the 2022 evaluation period. The percentage of home mortgage loans made in moderate-income CTs exceeded the percentage of owner-occupied housing units and the aggregate percentage of all reporting

lenders. Management did not originate any home mortgage loans in the low-income CT in 2022. Demographic and aggregate lending data indicate there are minimal owner-occupied housing units and lending opportunities in the low-income CT.

### ***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 loans to small businesses.

#### MN-WI MSA AA

The distribution of small business loans in different income level CTs is excellent for the 2020 and 2021 evaluation period. The percentage of loans made to small businesses in moderate-income CTs exceeded the percentage of small businesses and the aggregate percentage of all reporting lenders. The AA did not have any low-income CTs in 2020 and 2021.

The distribution of small business loans in different income level CTs is excellent for the 2022 evaluation period. The percentage of loans made to small businesses in the moderate-income CTs significantly exceeded the percentage of small businesses and the aggregate percentage of all reporting lenders. The AA did not have any low-income CTs in 2022.

#### Sheboygan MSA AA

The distribution of small business loans in different income level CTs is poor for the 2020 and 2021 evaluation period. Management did not originate any loans to small businesses in the moderate-income CTs, which is significantly below the percentage of small businesses and the aggregate percentage of all reporting lenders. The bank branch that serves the Sheboygan MSA AA is new (opened in early 2020) and is located far from the moderate-income CTs, limiting the bank's ability to make loans. The AA did not have any low-income CTs in 2020 and 2021.

The distribution of small business loans in different income level CTs is poor for the 2022 evaluation period. Management did not originate any loans to small businesses in the moderate-income CTs, which is below the percentage of small businesses and the aggregate percentage of reporting lenders. The AA did not have any low-income CTs in 2022.

#### WI Non-MSA AA

An analysis of the distribution of small business loans in different income level CTs was not completed for 2020 and 2021 because the AA did not have any low- or moderate-income CTs during that time period.

The distribution of small business loans in different income level CTs is reasonable for the 2022 evaluation period. The percentage of loans made to small businesses in the moderate-income CT exceeds the percentage of small businesses in moderate-income geographies and the aggregate percentage of all reporting lenders. Management did not originate any loans to small businesses in the low-income CT, which is below the percentage of small businesses in low-income geographies and the aggregate percentage of all reporting lenders.

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

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

### ***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.

#### MN-WI MSA AA

The distribution of home mortgage loans to individuals of different income levels is excellent for the 2020 and 2021 evaluation period. The percentage of loans made to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The distribution of home mortgage loans to individuals of different income levels is reasonable for the 2022 evaluation period. The percentage of loans made to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of loans made to moderate-income borrowers was significantly below the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

#### Sheboygan MSA AA

The distribution of home mortgage loans to individuals of different income levels is reasonable for the 2020 and 2021 evaluation period. The percentage of loans made to low-income borrowers was below the percentage of low-income families and the aggregate percentage of all reporting lenders. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

An analysis of the distribution of home mortgage loans to individuals of different income levels was not completed for 2022 as the bank did not have enough lending activity in the AA to provide a meaningful analysis. The bank only made six home mortgage loans in the AA in 2022.

#### WI Non-MSA AA

The distribution of home mortgage loans to individuals of different income levels is poor for the 2020 and 2021 evaluation period. Lending to low- and moderate-income borrowers was below the demographic comparator and the aggregate percentage of all reporting lenders.

The distribution of home mortgage loans to individuals of different income levels is excellent for the 2022 evaluation period. The percentage of loans made to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

### ***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 originations and purchases of loans to small businesses.

#### MN-WI MSA AA

The distribution of loans to small businesses is excellent for the 2020 and 2021 evaluation period. The percentage of loans made to small businesses was below the percentage of small businesses located in the AA but exceeded the aggregate percentage of all reporting lenders.

The distribution of loans to small businesses is excellent for the 2022 evaluation period. The percentage of loans made to small businesses was below the percentage of small businesses located in the AA but exceeded the aggregate performance of all reporting lenders.

#### Sheboygan MSA AA

The distribution of loans to small businesses is poor for the 2020 and 2021 evaluation period. The percentage of loans made to small businesses was below the percentage of small businesses located in the AA and the aggregate performance of all reporting lenders.

The distribution of loans to small businesses is poor for the 2022 evaluation period. The percentage of loans made to small businesses was below the percentage of small businesses located in the AA and the aggregate performance of all reporting lenders.

#### WI Non-MSA AA

The distribution of loans to small businesses is excellent for the 2020 and 2021 evaluation period. The percentage of loans made to small businesses was below the percentage of small businesses located in the AA but exceeded the aggregate performance of all reporting lenders.

The distribution of loans to small businesses is excellent for the 2022 evaluation period. The percentage of loans made to small businesses was below the percentage of small businesses located in the AA but exceeded the aggregate performance of all reporting lenders.

### **Responses to Complaints**

Neither the bank nor the OCC received any complaints related to HNB's CRA performance in Wisconsin during the evaluation period.



## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Wisconsin is rated Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs. HNB transitioned to ISB requirements effective January 1, 2022. As a result, the CD Test was only applicable for 2022. However, we also considered CD activity in 2020 and 2021 at the bank's option.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans for 2020-2022.

| <b>Community Development Loans</b> |            |              |               |               |
|------------------------------------|------------|--------------|---------------|---------------|
| Assessment Area                    | Total      |              |               |               |
|                                    | #          | % of Total # | \$(000's)     | % of Total \$ |
| MN-WI MSA AA                       | 147        | 62.0         | 6,500         | 55.6          |
| Sheboygan MSA AA                   | 27         | 11.4         | 2,782         | 23.8          |
| WI Non-MSA AA                      | 63         | 26.6         | 2,400         | 20.6          |
| <b>Total</b>                       | <b>237</b> | <b>100.0</b> | <b>11,682</b> | <b>100.0</b>  |

#### MN-WI MSA AA

CD lending activities exhibit excellent responsiveness to AA needs. Management originated no qualified CD loans in 2022 after the bank was designated as an ISB. However, HNB originated 147 qualified Paycheck Protection Program (PPP) loans, totaling \$6.5 million in 2020 and 2021. The PPP loans allowed local businesses to keep their workforce employed during the COVID-19 pandemic. This represents 14.1 percent of allocated tier 1 capital.

#### Sheboygan MSA AA

CD lending activities exhibit excellent responsiveness to AA needs. Management originated no qualified CD loans in 2022 after the bank was designated as an ISB. However, HNB originated 27 qualified PPP loans in 2020 and 2021. The PPP loans allowed local businesses to keep their workforce employed during the COVID-19 pandemic. This represents 59.8 percent of allocated tier 1 capital.

#### WI Non-MSA AA

CD lending activities exhibit excellent responsiveness to AA needs. Management originated one qualified CD loan totaling \$1.2 million in 2022. The loan is for an assisted living facility with the majority of residents receiving Medicaid. HNB also originated 62 qualified PPP loans totaling \$1.2 million in 2021. CD lending represents 37.2 percent of allocated tier 1 capital.

## Number and Amount of Qualified Investments

The bank exhibits poor responsiveness to qualified investments in the State of Wisconsin. The table below includes all qualified investments for 2020-2022.

| Qualified Investments   |               |           |                |              |           |              |              |               |                        |           |
|-------------------------|---------------|-----------|----------------|--------------|-----------|--------------|--------------|---------------|------------------------|-----------|
| Assessment Area         | Prior Period* |           | Current Period |              | Total     |              |              |               | Unfunded Commitments** |           |
|                         | #             | \$(000's) | #              | \$(000's)    | #         | % of Total # | \$(000's)    | % of Total \$ | #                      | \$(000's) |
| MN-WI MSA               | 0             | 0         | 17             | 16           | 17        | 50.0         | 16           | 0.2           | 0                      | 0         |
| Sheboygan MSA           | 0             | 0         | 4              | 3            | 4         | 11.8         | 3            | 0.1           | 0                      | 0         |
| WI Non-MSA              | 0             | 0         | 8              | 10           | 8         | 23.5         | 10           | 0.1           | 0                      | 0         |
| Statewide/Regional Area | 0             | 0         | 5              | 6,436        | 5         | 14.7         | 6,436        | 99.6          | 0                      | 0         |
| <b>Total</b>            | <b>0</b>      | <b>0</b>  | <b>34</b>      | <b>6,465</b> | <b>34</b> | <b>100.0</b> | <b>6,465</b> | <b>100.0</b>  | <b>0</b>               | <b>0</b>  |

\* 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.

### MN-WI MSA AA

Management provided nine qualified CD investments totaling \$8 thousand in 2022 and eight CD investments in 2020-21 totaling \$8 thousand. Qualified investments exhibited very poor responsiveness to AA needs. CD Investments account for less than one percent of allocated tier 1 capital. Qualified investments consist of donations to local organizations that provide affordable housing or community services to the low- and moderate-income (LMI) individuals.

### Sheboygan MSA AA

Management provided one qualified CD investment totaling \$1 thousand in 2022 and three CD investments in 2020-21 totaling \$2 thousand. Qualified investments exhibited very poor responsiveness to AA needs. The CD Investment accounts for less than one percent of allocated tier 1 capital. Qualified investments donations to local organizations that promote economic development and provide affordable housing for LMI individuals.

### WI Non-MSA AA

Management provided five qualified CD investments totaling \$8 thousand in 2022 and three CD investments in 2020-21 totaling \$2 thousand. Qualified investments exhibited very poor responsiveness to AA needs. CD Investments account for less than one percent of allocated tier 1 capital. Qualified investments consist of donations to local organizations that provide community services to LMI individuals, provide affordable housing, and promote economic development.

### Statewide/Regional Area

Management made two CD investments totaling \$2.9 million that benefits the statewide or regional area by providing affordable housing in 2022. This accounts for 5.2 percent of tier 1 capital. The primary investment is a \$2.9 million investment in a Community Development Financial Institution (CDFI) with a primary purpose of providing lending for affordable housing, including to LMI individuals in WI. The other investment was a \$500 donation to an organization promoting affordable housing in WI. In addition, HNB made three investments into qualifying CD organizations totaling \$3.5 million in 2020 and 2021. One \$3 million investment was made to a CDFI with a primary purpose of providing lending for affordable housing, including to LMI individuals in WI. Another investments included a \$500 thousand investment in a women-owned financial institution and a \$500 donation to an organization promoting affordable housing in WI.

## **Extent to Which the Bank Provides Community Development Services**

The bank exhibits poor responsiveness to CD services in the State of Wisconsin.

### MN-WI MSA AA

Qualified CD service activity exhibited poor responsiveness to AA needs. Four employees provided a total of 43 qualified service hours to three qualified CD organizations during the evaluation period. CD service hours included 31 hours for economic development purposes and eight hours for affordable housing.

### Sheboygan MSA AA

Qualified CD service activity exhibited very poor responsiveness to AA needs. No employees provided qualified service hours to qualified CD organizations during the evaluation period.

### WI Non-MSA AA

Qualified CD service activity exhibited adequate responsiveness to AA needs given that the bank only has one branch in the AA. One employee provided a total of 88 qualified service hours to one qualified CD organization during the evaluation period. CD service hours were to an organization focused on economic development.

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

|   |  |                                   |
|---|--|-----------------------------------|
| <b>Time Period Reviewed:</b>                            | 01/01/2020 to 12/31/2022   |                                   |
| <b>Bank Products Reviewed:</b>                          | Home mortgage and small business loans<br>CD loans, qualified investments, CD services |                                   |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>  | <b>Products Reviewed</b>          |
| Not Applicable  |  |                                   |
| <b>List of Assessment Areas and Type of Examination</b> |  |                                   |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>  | <b>Other Information</b>          |
| <b>State of Wisconsin</b>                               |  |                                   |
| MN-WI MSA AA  | Full-scope   | Counties of Pierce and St. Croix  |
| Sheboygan MSA AA  | Full-scope   | County of Sheboygan               |
| WI Non-MSA AA   | Full-scope   | Counties of Polk, Dunn, and Pepin |

## Appendix B: Summary of State Ratings

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| <b>RATINGS      Hiawatha National Bank</b> |                             |                       |                                  |
|--|-----------------------------|-----------------------|----------------------------------|
| <b>Overall Bank:</b>                       | <b>Lending Test Rating*</b> | <b>CD Test Rating</b> | <b>Overall Bank/State Rating</b> |
| Hiawatha National Bank                     | Outstanding                 | Satisfactory          | Satisfactory                     |
| State:                                     |                             |                       |                                  |
| Wisconsin                                  | Outstanding                 | Satisfactory          | Satisfactory                     |

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

**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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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.

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

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

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

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

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

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



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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

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. The table also presents aggregate peer data for the years the data is available. 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.

| 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  |
| MN-WI MSA        | 222                       | 59,115         | 32.9         | 9,747          | 0.0                               | 0.0          | 0.0        | 15.1                              | 11.3         | 16.5       | 76.7                              | 84.7         | 75.2        | 8.1                               | 4.1          | 8.3        | 0.0                               | 0.0          | 0.0        |
| Sheboygan MSA    | 30                        | 6,848          | 4.5          | 6,199          | 0.0                               | 0.0          | 0.0        | 7.7                               | 0.0          | 6.7        | 76.3                              | 90.0         | 75.4        | 15.9                              | 10.0         | 17.8       | 0.0                               | 0.0          | 0.0        |
| WI Non-MSA       | 422                       | 86,087         | 62.6         | 5,009          | 0.0                               | 0.0          | 0.0        | 0.0                               | 0.0          | 0.0        | 100.0                             | 100.0        | 100.0       | 0.0                               | 0.0          | 0.0        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>674</b>                | <b>152,051</b> | <b>100.0</b> | <b>20,955</b>  | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> | <b>8.3</b>                        | <b>3.7</b>   | <b>9.7</b> | <b>83.2</b>                       | <b>94.5</b>  | <b>81.2</b> | <b>8.5</b>                        | <b>1.8</b>   | <b>9.1</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

| 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  |
| MN-WI MSA        | 33                        | 7,763         | 35.5         | 4,828          | 0.0                               | 0.0          | 0.0        | 16.8                              | 33.3         | 15.8       | 75.4                              | 63.6         | 76.7        | 7.8                               | 3.0          | 7.5         | 0.0                               | 0.0          | 0.0        |
| Sheboygan MSA    | 6                         | 2,843         | 6.5          | 3,500          | 0.0                               | 0.0          | 0.0        | 3.9                               | 0.0          | 6.4        | 73.9                              | 33.3         | 71.9        | 22.1                              | 66.7         | 21.7        | 0.0                               | 0.0          | 0.0        |
| WI Non-MSA       | 54                        | 9,738         | 58.1         | 2,901          | 0.0                               | 0.0          | 0.6        | 2.8                               | 5.6          | 3.7        | 93.3                              | 88.9         | 91.6        | 3.9                               | 5.6          | 4.1         | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>93</b>                 | <b>20,345</b> | <b>100.0</b> | <b>11,229</b>  | <b>0.0</b>                        | <b>0.0</b>   | <b>0.2</b> | <b>8.5</b>                        | <b>15.1</b>  | <b>9.7</b> | <b>80.0</b>                       | <b>76.3</b>  | <b>79.0</b> | <b>11.5</b>                       | <b>8.6</b>   | <b>11.1</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 |                           |                |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              | 2020-21     |
|---|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| 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   |
| MN-WI MSA   | 222                       | 59,115         | 32.9         | 9,747          | 19.4                 | 9.0          | 8.1        | 20.0                      | 24.8         | 21.6        | 25.1                    | 33.8         | 25.4        | 35.5                   | 30.2         | 29.4        | 0.0                            | 2.3          | 15.4        |
| Sheboygan MSA   | 30                        | 6,848          | 4.5          | 6,199          | 17.7                 | 3.3          | 8.2        | 18.4                      | 23.3         | 22.1        | 25.6                    | 16.7         | 23.0        | 38.3                   | 56.7         | 33.4        | 0.0                            | 0.0          | 13.4        |
| WI Non-MSA  | 422                       | 86,087         | 62.6         | 5,009          | 17.6                 | 3.3          | 4.4        | 19.5                      | 14.0         | 17.9        | 22.8                    | 24.6         | 24.5        | 40.1                   | 58.1         | 39.9        | 0.0                            | 0.0          | 13.3        |
| <b>Total</b>  | <b>674</b>                | <b>152,051</b> | <b>100.0</b> | <b>20,955</b>  | <b>18.3</b>          | <b>5.2</b>   | <b>7.2</b> | <b>19.3</b>               | <b>18.0</b>  | <b>20.9</b> | <b>24.6</b>             | <b>27.3</b>  | <b>24.5</b> | <b>37.7</b>            | <b>48.8</b>  | <b>33.1</b> | <b>0.0</b>                     | <b>0.7</b>   | <b>14.3</b> |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower |                           |               |              |                |                      |              |             |                           |              |             |                         |              |             |                        |              |             |                                |              | 2022        |
|---|---------------------------|---------------|--------------|----------------|----------------------|--------------|-------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| 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   |
| MN-WI MSA   | 33                        | 7,763         | 35.5         | 4,828          | 18.7                 | 18.2         | 11.8        | 21.2                      | 6.1          | 23.8        | 27.9                    | 33.3         | 25.1        | 32.2                   | 39.4         | 25.0        | 0.0                            | 3.0          | 14.3        |
| Sheboygan MSA   | 6                         | 2,843         | 6.5          | 3,500          | 15.6                 | 0.0          | 10.7        | 20.6                      | 0.0          | 22.8        | 24.7                    | 33.3         | 23.6        | 39.1                   | 50.0         | 31.7        | 0.0                            | 16.7         | 11.2        |
| WI Non-MSA  | 54                        | 9,738         | 58.1         | 2,901          | 17.3                 | 7.4          | 6.5         | 17.7                      | 25.9         | 21.3        | 23.1                    | 24.1         | 23.6        | 41.9                   | 42.6         | 36.3        | 0.0                            | 0.0          | 12.3        |
| <b>Total</b>  | <b>93</b>                 | <b>20,345</b> | <b>100.0</b> | <b>11,229</b>  | <b>17.3</b>          | <b>10.8</b>  | <b>10.1</b> | <b>20.0</b>               | <b>17.2</b>  | <b>22.8</b> | <b>25.5</b>             | <b>28.0</b>  | <b>24.2</b> | <b>37.2</b>            | <b>41.9</b>  | <b>30.0</b> | <b>0.0</b>                     | <b>2.2</b>   | <b>12.8</b> |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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.

| <b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b> |  |                 |                   |                       |                          |                     |                  |                               |                     |                  |                             |                     |                  |                            |                     |                  |                                    |                     |                  | <b>2020-21</b> |
|---|--|-----------------|-------------------|-----------------------|--------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|-----------------------------|---------------------|------------------|----------------------------|---------------------|------------------|------------------------------------|---------------------|------------------|----------------|
| <b>Assessment Area:</b>   | <b>Total Loans to Small Businesses</b> |                 |                   |                       | <b>Low-Income Tracts</b> |                     |                  | <b>Moderate-Income Tracts</b> |                     |                  | <b>Middle-Income Tracts</b> |                     |                  | <b>Upper-Income Tracts</b> |                     |                  | <b>Not Available-Income Tracts</b> |                     |                  |                |
|   | <b>#</b>                               | <b>\$ (000)</b> | <b>% of Total</b> | <b>Overall Market</b> | <b>% Businesses</b>      | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>           | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>         | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>        | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>                | <b>% Bank Loans</b> | <b>Aggregate</b> |                |
| MN-WI MSA   | 20                                     | 3,113           | 20.3              | 2,399                 | 0.0                      | 0.0                 | 0.0              | 17.3                          | 35.0                | 14.5             | 74.1                        | 55.0                | 73.3             | 8.6                        | 10.0                | 11.7             | 0.0                                | 0.0                 | 0.5              |                |
| Sheboygan MSA   | 20                                     | 6,842           | 44.6              | 1,944                 | 0.0                      | 0.0                 | 0.0              | 16.2                          | 0.0                 | 15.8             | 68.4                        | 90.0                | 66.5             | 15.4                       | 10.0                | 16.8             | 0.0                                | 0.0                 | 0.9              |                |
| WI Non-MSA  | 19                                     | 5,401           | 25.2              | 1,492                 | 0.0                      | 0.0                 | 0.0              | 0.0                           | 0.0                 | 0.0              | 100.0                       | 100.0               | 99.2             | 0.0                        | 0.0                 | 0.0              | 0.0                                | 0.0                 | 0.8              |                |
| <b>Total</b>  | <b>59</b>                              | <b>15,357</b>   | <b>100.0</b>      | <b>5,835</b>          | <b>0.0</b>               | <b>0.0</b>          | <b>0.0</b>       | <b>12.0</b>                   | <b>11.9</b>         | <b>11.2</b>      | <b>79.8</b>                 | <b>81.4</b>         | <b>77.7</b>      | <b>8.2</b>                 | <b>6.8</b>          | <b>10.4</b>      | <b>0.0</b>                         | <b>0.0</b>          | <b>0.7</b>       |                |

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

| <b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b> |  |                 |                   |                       |                          |                     |                  |                               |                     |                  |                             |                     |                  |                            |                     |                  |                                    |                     |                  | <b>2022</b> |
|---|--|-----------------|-------------------|-----------------------|--------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|-----------------------------|---------------------|------------------|----------------------------|---------------------|------------------|------------------------------------|---------------------|------------------|-------------|
| <b>Assessment Area:</b>   | <b>Total Loans to Small Businesses</b> |                 |                   |                       | <b>Low-Income Tracts</b> |                     |                  | <b>Moderate-Income Tracts</b> |                     |                  | <b>Middle-Income Tracts</b> |                     |                  | <b>Upper-Income Tracts</b> |                     |                  | <b>Not Available-Income Tracts</b> |                     |                  |             |
|   | <b>#</b>                               | <b>\$ (000)</b> | <b>% of Total</b> | <b>Overall Market</b> | <b>% Businesses</b>      | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>           | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>         | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>        | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Businesses</b>                | <b>% Bank Loans</b> | <b>Aggregate</b> |             |
| MN-WI MSA   | 20                                     | 5,752           | 25.7              | 2,393                 | 0.0                      | 0.0                 | 0.0              | 17.2                          | 45.0                | 15.1             | 74.4                        | 55.0                | 73.9             | 8.5                        | 0.0                 | 9.9              | 0.0                                | 0.0                 | 1.0              |             |
| Sheboygan MSA   | 22                                     | 7,882           | 35.2              | 1,881                 | 0.0                      | 0.0                 | 0.0              | 6.6                           | 0.0                 | 7.4              | 73.1                        | 86.4                | 70.7             | 20.3                       | 13.6                | 21.4             | 0.0                                | 0.0                 | 0.4              |             |
| WI Non-MSA  | 17                                     | 8,758           | 39.1              | 1,435                 | 2.2                      | 0.0                 | 1.0              | 2.9                           | 5.9                 | 3.2              | 92.1                        | 88.2                | 91.5             | 2.8                        | 5.9                 | 3.2              | 0.0                                | 0.0                 | 1.1              |             |
| <b>Total</b>  | <b>59</b>                              | <b>22,393</b>   | <b>100.0</b>      | <b>5,709</b>          | <b>0.6</b>               | <b>0.0</b>          | <b>0.3</b>       | <b>9.9</b>                    | <b>16.9</b>         | <b>9.6</b>       | <b>79.1</b>                 | <b>76.3</b>         | <b>77.3</b>      | <b>10.3</b>                | <b>6.8</b>          | <b>12.0</b>      | <b>0.0</b>                         | <b>0.0</b>          | <b>0.9</b>       |             |

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 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  |                                 |                   |              |                |                                 |              |             |                                |              |  | 2020-21      |
|--|---------------------------------|-------------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| Assessment Area:   | Total Loans to Small Businesses |                   |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |
|  | #                               | \$                | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |
| MN-WI MSA  | 20                              | 4,969,696         | 28.9         | 2,399          | 84.4                            | 60.0         | 52.7        | 5.4                            | 20.0         | 10.3                                   | 20.0         |
| Sheboygan MSA  | 20                              | 6,842,029         | 39.7         | 1,944          | 78.6                            | 35.0         | 57.0        | 7.6                            | 55.0         | 13.8                                   | 10.0         |
| WI Non-MSA   | 19                              | 5,401,847         | 31.4         | 1,492          | 81.5                            | 73.7         | 50.6        | 5.6                            | 21.1         | 12.9                                   | 5.3          |
| <b>Total</b>   | <b>59</b>                       | <b>17,213,572</b> | <b>100.0</b> | <b>5,835</b>   | <b>81.8</b>                     | <b>55.9</b>  | <b>53.6</b> | <b>6.1</b>                     | <b>32.2</b>  | <b>12.1</b>                            | <b>11.9</b>  |
| <i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.<br/>           Due to rounding, totals may not equal 100.0%</i> |                                 |                   |              |                |                                 |              |             |                                |              |  |              |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues  |                                 |                   |              |                |                                 |              |             |                                |              |  | 2022         |
|--|---------------------------------|-------------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| Assessment Area:   | Total Loans to Small Businesses |                   |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |
|  | #                               | \$                | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |
| MN-WI MSA  | 20                              | 5,752,238         | 25.7         | 2,393          | 87.6                            | 60.0         | 51.7        | 4.0                            | 35.0         | 8.3                                    | 5.0          |
| Sheboygan MSA  | 22                              | 7,882,460         | 35.2         | 1,881          | 82.6                            | 45.5         | 55.4        | 6.2                            | 50.0         | 11.2                                   | 4.5          |
| WI Non-MSA   | 17                              | 8,758,439         | 39.1         | 1,435          | 85.4                            | 58.8         | 50.1        | 4.2                            | 29.4         | 10.4                                   | 11.8         |
| <b>Total</b>   | <b>59</b>                       | <b>22,393,137</b> | <b>100.0</b> | <b>5,709</b>   | <b>85.5</b>                     | <b>54.2</b>  | <b>52.5</b> | <b>4.7</b>                     | <b>39.0</b>  | <b>9.8</b>                             | <b>6.8</b>   |
| <i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.<br/>           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.