



PUBLIC DISCLOSURE

September 12, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Stephenson National Bank and Trust
Charter Number 4137

1820 Hall Avenue
Marinette, WI 54143

Office of the Comptroller of the Currency

1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and the credit needs of its assessment areas (AAs).
- A majority of loan originations are made within the bank's AAs.
- The borrower distribution of home mortgage loans among borrowers of different incomes and small loans to businesses of different sizes are considered reasonable.
- The bank exhibits reasonable geographic distribution of loans in the AA.
- The bank's community development (CD) performance through CD loans, qualified investments, and services demonstrate adequate responsiveness to CD needs in the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is more than reasonable.

The bank's quarterly LTD ratio averages 79.13 percent over the 12 quarters starting September 30, 2019, to June 30, 2022. The bank ranks second in its peer group that includes six other similarly situated banks with LTD ratios of 56.84 percent and to 89.95 percent. The banks in this peer group have total assets ranging from \$128 million to \$37 billion, with Stephenson National Bank and Trust (SNBT) being the third largest.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 89.10 percent of its total loans by number and 75.0 percent of its total loans by dollar amount 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. See the chart below for additional detail.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	248	91.2	24	8.8	272	40,306	90.1	4,409	9.9	44,715
2020	552	85.7	92	14.3	644	75,529	74.8	25,510	25.2	101,039
2021	403	93.5	28	6.5	431	55,184	89.5	6,483	10.5	61,667
Subtotal	1203	89.3	144	10.7	1,347	171,019	82.5	36,402	17.5	207,421
Small Business										
2019 - 2021	105	86.8	16	13.2	121	10,046,498	75.0	3,404,807	25.0	13,451,305
Subtotal	1,308	87.3	160	12.7	1,468	10,217,517	75.0	3,441,209	25.0	13,658,726
Total	1,308	89.1	160	10.9	1,468	10,217,517	75.0	3,441,209	25.0	13,658,726
<i>Source: Bank Data</i> <i>Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Stephenson National Bank and Trust is a \$655 million institution headquartered in Marinette, Wisconsin. The bank is wholly owned by Stephenson National Bancorp, Inc., a one-bank holding company. The bank has six full-services branches, five of which are located in the state of Wisconsin, and one is located in the state of Michigan. The bank also has a Trust office in Marquette, Michigan as well as a Loan Production Office (LPO) in Green Bay, Wisconsin. The bank operates ATMs at all branch locations and added a deposit-taking ATM at their LPO in Green Bay, Wisconsin on January 1, 2021, which added Brown County as a new AA.

SNBT's business strategy has been to serve the credit and depository needs of its local community by offering traditional commercial and residential products. Bank operations are primarily funded through local core deposits, which total \$565 million, or 86.30 percent of total assets. Total loans represent 68.56 percent of total assets as of June 30, 2022. By dollar volume, the loan portfolio consists of 64.31 percent commercial loans, 23.75 percent residential real estate loans, 11.79 percent consumer loans, and 0.15 percent agricultural loans. Tier 1 capital totals \$61.4 million.

SNBT has three AAs, which includes 25 CTs, located in both Michigan and Wisconsin. The AAs include six CTs in Menominee County in the state of Michigan, all 12 CTs in Marinette County in the State of Wisconsin, and seven CTs in Oconto County in the State of Wisconsin. The AAs comply with regulatory requirements and do not arbitrarily exclude any low- or moderate-income (LMI) geographies. There are no low-income CTs located in any of the bank's AAs.

The bank also received positive consideration for its response to the COVID – 19 pandemic during the evaluation period through the origination of SBA Paycheck Protection Program (PPP) loans. These loans helped to stabilize small businesses and communities in the AA and statewide. The bank

originated \$36,500,891 in the first round of PPP loans and \$14,169,027 in the second round of PPP loans.

There are no legal or financial factors impeding the bank's ability to meet the credit needs in its AAs. SNBT was evaluated as an Intermediate Small Bank (ISB) and received a Satisfactory rating at its prior CRA examination dated August 5, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated SNBT's performance under the ISB Lending and CD Tests. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities. The CD Test evaluates the bank's responsiveness to needs in its AA through CD lending, qualified investments, and services. We reviewed data for the bank's primary loan products, small business loans and home mortgage loans, to evaluate the bank's lending performance.

This evaluation covers the period since the prior CRA examination, August 5, 2019, through September 12, 2022. The Lending Test evaluated loans originated between January 1, 2019, and December 31, 2021, and the CD Test evaluated CD activities during the same period.

For the Lending Test, we evaluated home mortgage loans, which include home purchase, home improvement, refinance, and multifamily loans reported under the Home Mortgage Disclosure Act (HMDA). In addition, to evaluate small business lending, we used data from bank reports and a random sample of business loans originated in the bank's AAs. Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

Selection of Areas for Full-Scope Review

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

The bank's overall rating is a blend of the state ratings, as of December 31, 2021. The state of Wisconsin received the most weight given the state of Wisconsin holds 69.95 percent of deposits and 72.80 percent of loans, while the state of Michigan holds 27.37 percent of deposits and 24.60 percent of loans. The remaining 2.68 percent of deposits and 2.60 percent of loans are held by other.

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

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The borrower distribution of home mortgage loans among borrowers of different incomes and small loans to businesses of different sizes are considered reasonable.
- The bank exhibits reasonable geographic distribution of loans in the AA.
- The bank's CD performance through CD loans, qualified investments, and services demonstrates adequate responsiveness to CD needs in the AAs.

Description of Institution's Operations in Wisconsin

SNBT operates five full-services branches in Wisconsin as well as a LPO in Green Bay, Wisconsin. Four of the five branches are in Marinette County while one branch is in Oconto County. All four branches in Marinette County are in middle-income CTs while the Oconto branch is in a moderate-income CT. All branches have ATMs on site. The bank added a deposit-taking ATM in Green Bay, Wisconsin on January 1, 2021, adding Brown County into the bank's AA.

Bank deposits have remained stable throughout the examination period. As of December 31, 2021, Wisconsin deposits account for 70.0 percent of total bank deposits, or \$403 million. Wisconsin deposits primarily consist of checking and savings accounts, which account for 75.70 percent of Wisconsin deposits, or \$305 million. Bank loans have also remained stable throughout the examination period. As of December 31, 2021, Wisconsin loans account for 72.80 percent of total bank loans, or \$403 million.

Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Stephenson WI Non-MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	15.4	76.9	0.0	7.7
Population by Geography	41,287	0.0	16.3	83.7	0.0	0.0
Housing Units by Geography	30,393	0.0	27.1	72.9	0.0	0.0
Owner-Occupied Units by Geography	13,841	0.0	17.4	82.6	0.0	0.0
Occupied Rental Units by Geography	4,478	0.0	12.9	87.1	0.0	0.0
Vacant Units by Geography	12,074	0.0	43.5	56.5	0.0	0.0
Businesses by Geography	2,354	0.0	13.1	86.9	0.0	0.0
Farms by Geography	149	0.0	14.8	85.2	0.0	0.0
Family Distribution by Income Level	11,341	20.3	22.0	24.8	32.9	0.0
Household Distribution by Income Level	18,319	26.7	18.2	19.7	35.3	0.0
Median Family Income Non-MSAs – WI		\$60,742	Median Housing Value			\$112,901
			Median Gross Rent			\$624
			Families Below Poverty Level			8.8%

Employment and Economic Factors

The three major areas of employment in the Marinette, WI area are manufacturing, retail trade and construction. Major employers include Fincantieri Marinette Marine, Johnson Controls, Waupaca Foundry, and the Aurora Medical Center – Bay Area. The unemployment rate for Marinette County and the state of Wisconsin as of June 2022 was 3.4 percent and 3.5 percent, respectively. According to Moody’s Analytics, the labor force in Wisconsin will decline at a faster rate due to the aging population in this area. Overall, since the pandemic, the overall recovery has been slow and labor shortages have left many businesses short of employees, but the local economy is stable.

Community Contact

We spoke with one community contact regarding all AAs. Overall, the needs of the community are being met by local financial institutions. The contact stated that the AA has a growing manufacturing base which is bringing employees into the area with well-paid jobs, but the housing market and lack of housing in the area are the most significant challenges they see. Unemployment is low, and employers are struggling with maintaining employees in the restaurants and tourism areas. Small businesses are largely performing positively but are still recovering from the pandemic. The area has a high population of aging individuals. The contact stated that SNBT is very involved in the community in different capacities. The bank is very engrained in the community by supporting all organizations and making their presence known in the community both financially and by volunteering their time and skills.

Scope of Evaluation in Wisconsin

For the state of Wisconsin, we completed a full-scope review of the non-MSA and a limited-scope review for the Green Bay MSA. The non-MSA AA is weighted more heavily in arriving at the overall conclusion for the state, as the bank's largest market share of loans and deposits is concentrated in this area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Satisfactory. Based on a full-scope review, the bank's lending performance in the state of Wisconsin is reasonable.

Conclusions for Areas Receiving Full-Scope Reviews

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable 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.

Non-MSA AA

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. The bank originated 22.8 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans exceeds the demographics that show 17.4 percent of owner-occupied housing is in moderate-income geographies. The percentage of bank loans is above the aggregate peer lending data, which shows 20.4 percent of peer home mortgage lending was in moderate-income geographies.

Small Loans to Businesses

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

Non-MSA AA

The geographic distribution of business loans reflects poor distribution among geographies. There are no low-income CTs in the bank's AA. Based on our sample, the bank originated 7.2 percent of small business loans in moderate-income geographies. This percentage is less than the demographics which show 13.1 percent of AA businesses are in moderate-income geographies. The percentage of bank loans is less than the aggregate peer lending data, which shows 9.3 percent of peer lending was to businesses in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable 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.

Non-MSA AA

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 5.5 percent of its home mortgages to low-income families, which is below the demographics that show 20.3 percent of families in the AA are low-income. The percentage of bank loans to low-income families is slightly below the aggregate peer lending data, which shows 6.0 percent of peer lending within the AA was to low-income families. The bank originated 18.9 percent of home mortgages to moderate-income families, which is less than the demographics that show 22.0 percent of families in the AA are moderate-income. The bank's lending exceeds the aggregate peer lending data, which shows 18.7 percent of peer lending within the AA was to moderate-income families.

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 small loans to businesses.

Non-MSA AA

The borrower distribution of loans reflects reasonable distribution among businesses of different sizes. Our random sample shows the bank originated 74.1 percent of its business loans to small businesses (business with gross annual revenues of \$1.0 million or less) within the AA. The bank's lending percentage is below the demographics that shows 77.0 percent of AA businesses are small businesses. However, the bank's lending exceeds the aggregate peer lending data, which shows 50.7 percent of peer business lending in the AA was to small businesses.

Conclusions for Area Receiving a Limited Scope Review

Based on limited-scope reviews, the bank's performance under the Lending Test in the Green Bay MSA is consistent with the bank's overall performance under the Lending Test in the full scope areas.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practices during this evaluation.

COMMUNITY DEVELOPMENT TEST

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

Based on our full-scope review, the bank exhibits adequate responsiveness to CD needs in its AAs through CD loans, qualified investments, and CD Services, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

SNBT's CD lending record reflects adequate responsiveness in identifying and addressing the credit needs in the bank's AAs.

SNBT originated or renewed 14 loans, totaling \$1,640,483, during the evaluation period in the bank's Wisconsin non-MSA AA. One of the companies is a nonprofit organization dedicated to improving the community and economic vitality of the area with loans totaling \$293,600. There were also loans for a senior citizen center to assist in meeting the challenges of poverty and housing.

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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Non-MSA	14	82.0	1,640,483	93.0
Green Bay MSA	3	18.0	122,516	7.0

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000')	#	\$(000')	#	% of Total	\$(000')	% of Total	#	\$(000's)
Non-MSA	0	0	60	129	60	74.0	129	7.0	0	0
Green Bay MSA	0	0	21	1,773	21	26.0	1,773	93.0	0	0

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

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

The bank's qualified investments included 81 charitable donations to 51 organizations, totaling \$1,902,915, in the AAs. These investments were to organizations that support economic development, affordable housing initiatives, and community services targeted towards LMI individuals and geographies. Of note, there were 13 donations totaling \$36,050 that benefited both Marinette and Menominee Counties. While both AAs benefited from the donations, we allocated the funds to the Marinette County AA during this Performance Evaluation because the donations were allocated to Menominee in the last Performance Evaluation.

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

Extent to Which the Bank Provides Community Development Services

SNBT demonstrates adequate responsiveness to the CD service needs in its AAs. Overall, 51 bank employees spent 4,892 hours providing financial expertise and technical assistance to 50 different CD organizations that serve the bank's AA. These organizations address the AA's need for affordable housing, economic development, and social services to LMI individuals.

While not an all-inclusive list, the following are examples of some of the services provided:

- An employee serves on the board of an organization as treasurer, providing financial expertise.
- Several of bank senior management serve on boards for the purpose of downtown development providing lending expertise to help the organization promote business retention and economic growth in the AAs.
- An employee serves as a board member for a micro loan fund committee providing financial expertise.
- Multiple employees serve on various planning commissions in the AA.
- Senior management serves as director of an organization for the state of Wisconsin Banking Association.

Conclusions for Area Receiving a Limited Scope Review

Based on limited-scope reviews, the bank's performance under the CD Test in the Green Bay MSA is consistent with the bank's overall performance under the CD Test in the full scope areas.

State Rating

State of Michigan

CRA rating for the State of Michigan: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The borrower distribution of mortgage loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of small business loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of small business loans reflects reasonable distribution among geographies.
- The bank's CD performance through CD loans, qualified investments, and services demonstrates adequate responsiveness to CD needs in the AA.

Description of Institution's Operations in Michigan

SNBT operates one full-service branch in the state of Michigan, located in Menominee, MI, as well as a Trust office, located in Marquette, MI. The full-service branch is in a middle-income CT, while the trust office is not included in the bank's AA as they do not take deposits at this location. The Menominee, MI location has one ATM on-site.

Bank deposits have remained stable throughout the examination period. The state of Michigan is a secondary source of total deposits for the bank. As of December 31, 2021, Michigan deposits account for 27.4 percent of total bank deposits, or \$158 million. Michigan deposits primarily consist of checking and savings accounts, which account for 75.6 percent of Michigan deposits, or \$119 million.

Bank loans have remained stable throughout the examination period. As of December 31, 2021, Michigan loans account for 24.6 percent of total bank loans, or \$137 million.

Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Stephenson MI Non-MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	42.9	28.6	14.3
Population by Geography	20,152	0.0	19.4	47.8	32.8	0.0
Housing Units by Geography	11,906	0.0	16.2	51.9	31.9	0.0
Owner-Occupied Units by Geography	7,178	0.0	17.7	45.5	36.9	0.0
Occupied Rental Units by Geography	2,051	0.0	24.2	53.7	22.1	0.0
Vacant Units by Geography	2,677	0.0	6.3	67.5	26.2	0.0
Businesses by Geography	1,022	0.0	17.8	56.2	26.0	0.0
Farms by Geography	59	0.0	6.8	61.0	32.2	0.0
Family Distribution by Income Level	5,608	20.0	18.8	24.0	37.1	0.0
Household Distribution by Income Level	9,229	26.6	17.5	17.2	38.7	0.0
Median Family Income Non-MSAs - MI		\$53,628	Median Housing Value			\$100,568
			Median Gross Rent			\$535
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment and Economic Factors

The largest employers in Menominee County are the same as mentioned for Marinette County, Wisconsin as they are bordering counties. They include Fincantieri Marinette Marine, Johnson Controls, Waupaca Foundry, and Aurora Medical Center – Bay Area.

According to the Bureau of Labor Statistics, the unemployment rate for Menominee County was 4.6 percent and the state of Michigan was 4.8 percent as of June 2022.

The bank ranks fourth according to the Deposit Market Share Report as of June 30, 2022, with a market share of 4.77 percent. There is competition from larger institutions in the AA, since adding Brown County to its AA. The top three financial institutions had deposit market shares of 33.06 percent (Associated Bank), 19.87 percent (Nicolet National Bank), and 10.57 percent (BMO Harris Bank).

Scope of Evaluation in Michigan

There is one AA in the state of Michigan, which received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Michigan is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to table O in the state of Michigan 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.

Non-MSA AA

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. The bank originated 19.6 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans exceeds the demographics that show 17.7 percent of owner-occupied housing is in moderate-income geographies. The percentage of bank loans is below the aggregate peer lending data, which shows 22.2 percent of peer home mortgage lending was in moderate-income geographies.

Small Loans to Businesses

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

Non-MSA AA

The geographic distribution of business loans reflects excellent distribution among geographies. There are no low-income CTs in the bank's AA. Based on our sample, the bank originated 37.0 percent of small business loans in moderate-income geographies. This percentage exceeds the demographics which show 17.8 percent of AA businesses are in moderate-income geographies. The percentage of bank loans also exceeds the aggregate peer lending data, which shows 11.8 percent of peer lending was to businesses in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to table P in the state of Michigan 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.

Non-MSA AA

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 4.3 percent of its home mortgages to low-income families, which is below the demographics that show 20.0 percent of families in the AA are low-income. The percentage of bank loans to low-income families is also below but near the aggregate peer lending data, which shows 5.6 percent of peer lending within the AA was to low-income families. The bank originated 13.3 percent of home mortgages to moderate-income families, which is less than the demographics that show 18.8 percent of families in the AA are moderate-income. The bank's lending is less than the aggregate peer lending data, which shows 17.4 percent of peer lending within the AA was to moderate-income families.

Small Loans to Businesses

Refer to table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Non-MSA AA

The borrower distribution of loans reflects excellent distribution among businesses of different sizes. Our random sample shows the bank originated 79.0 percent of its business loans to small businesses (business with gross annual revenues of \$1.0 million or less) within the AA. The bank's lending exceeds the demographics that shows 77.2 percent of AA businesses are small businesses. The bank's lending also exceeds the aggregate peer lending data, which shows 61.8 percent of peer business lending in the AA was to small businesses.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practices during this evaluation.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Michigan is rated Satisfactory.

The bank exhibits adequate responsiveness to CD needs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

SNBT’s CD lending record reflects adequate responsiveness to identifying and addressing the credit needs in the bank’s AA.

SNBT originated one new loan for \$3,500 to an organization supporting community and neighborhood economic development. SNBT originated or renewed \$1,233,083 in loans for Menominee and Marinette Counties. We allocated these loans to the Marinette County portion of CD loans. These loans were all for economic development and community services targeted towards LMI individuals and geographies.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Non-MSA	0	0	16	30	16	100	30	100	0	0

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

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

The bank’s qualified investments included 16 charitable donations to 10 organizations, totaling \$36,050, in the AA. These investments were to organizations that support affordable housing initiatives, economic development, and community services targeted towards LMI individuals and geographies.

Extent to Which the Bank Provides Community Development Services

SNBT demonstrates adequate responsiveness to the CD service needs in its AAs.

During the evaluation period, SNBT employees provided financial expertise and technical assistance to several CD organizations serving the bank’s AAs. These organizations address AA needs for affordable housing, economic development, and social services to LMI individuals.

While not a comprehensive list, the following are some highlights of the services provided:

- Employees taught financial education programs to high school and elementary students.
- Senior management executives serve in the capacity of president and treasurer of a business development corporation. This organization is for economic development in the neighboring communities and neighborhoods.
- Several employees serve on boards in the Menominee/Marinette area to aid in financial assistance for school programs. These programs reach thousands of children for financial assistance and mentoring programs.

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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”.

Time Period Reviewed:	01/01/2019 – 12/31/2021	
Bank Products Reviewed:	(Home mortgage, small business loans) (Community development loans, qualified investments, community development services)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wisconsin		
Non-MSA	Full-Scope	All of Marinette County
Green Bay MSA	Limited-Scope	Portion of Oconto County and Brown County in the Green Bay MSA
Michigan		
Non-MSA	Full-Scope	Portion of Menominee County

Appendix B: Summary of MMSA and State Ratings

RATINGS The Stephenson National Bank & Trust			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
SNBT	Satisfactory	Satisfactory	Satisfactory
State:			
Wisconsin	Satisfactory	Satisfactory	Satisfactory
Michigan	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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

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 30th of each year. Tables without data are not included in this PE.

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

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

State of Wisconsin

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Non-MSA WI	724	92,201	100.0	1,937	0.0	0.0	0.0	17.4	22.8	20.4	82.6	77.2	79.6	0.0	0.0	0.0	0.0	0.0	0.0	
Total	724	92,201	100.0	1,937	0.0	0.0	0.0	17.4	22.8	20.4	82.6	77.2	79.6	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Green Bay MSA – Oconto County	95	13,055	100.0	2,027	0.0	0.0	0.0	9.2	1.3	5.7	60.5	91.6	49.0	30.3	7.4	45.3	0.0	0.0	0.0	
Total	95	13,055	100.0	2,027	0.0	0.0	0.0	9.2	1.3	5.7	60.5	91.6	49.0	30.3	7.4	45.3	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Green Bay MSA – Oconto and Brown County	83	15,401	100.0	19,334	1.0	0.0	0.8	21.4	12.0	16.6	51.0	71.1	47.4	26.6	16.9	35.1	0.0	0.0	0.0
Total	83	15,401	100.0	19,334	1.0	0.0	0.8	21.4	12.0	16.6	51.0	71.1	47.4	26.6	16.9	35.1	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2020 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																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA WI	724	92,201	100.0	1,937	20.3	5.5	6.0	22.0	18.9	18.7	24.8	23.3	20.7	32.9	44.8	39.5	0.0	7.5	15.1
Total	724	92,201	100.0	1,937	20.3	5.5	6.0	22.0	18.9	18.7	24.8	23.3	20.7	32.9	44.8	39.5	0.0	7.5	15.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 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 **2019-20**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Green Bay MSA - Oconto County	95	13,055	100.0	2,027	18.8	12.6	7.9	18.9	27.4	22.5	23.3	20.0	25.1	39.0	34.7	32.9	0.0	6.7	11.6
Total	95	13,055	100.0	2,027	18.8	12.6	7.9	18.9	27.4	22.5	23.3	20.0	25.1	39.0	34.7	32.9	0.0	6.7	11.6

Source: 2015 ACS ; 01/01/2019 - 12/31/2020 Bank Data, 2020 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 **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Green Bay MSA – Oconto and Brown County	83	15,401	100.0	19,334	20.1	7.2	8.0	18.4	24.1	21.3	21.7	18.1	22.7	39.8	33.7	35.3	0.0	16.9	12.6
Total	83	15,401	100.0	19,334	20.1	7.2	8.0	18.4	24.1	21.3	21.7	18.1	22.7	39.8	33.7	35.3	0.0	16.9	12.6

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA WI	52	4,351	100.0	343	0.0	0.0	0.0	13.1	7.2	9.3	86.9	92.8	90.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	52	4,351	100.0	343	0.0	0.0	0.0	13.1	7.2	9.3	86.9	92.8	90.7	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-20**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Green Bay MSA – Oconto County	20	3,258	100	382	0.0	0.00	0.0	8.8	37.6	8.6	64.7	51.8	49.2	26.6	10.6	42.1	0.0	0.0	0.0
Total	20	3,258	100	382	0.0	0.0	0.0	8.8	37.6	8.6	64.7	51.8	49.2	26.6	10.6	42.1	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Green Bay MSA – Oconto and Brown County	7	693,988	100	5,640	2.9	0.0	3.2	26.8	7.7	27.1	46.0	58.8	43.1	24.3	33.5	26.6	0.0	0.0	0.0
Total	7	693,988	100	5,640	2.9	0.0	3.2	26.8	7.7	27.1	46.0	58.8	43.1	24.3	33.5	26.6	0.0	0.0	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA WI	52	4,351	100.0	343	77.0	74.1	50.7	6.8	25.9	16.3	0.0	
Total	52	4,351	100.0	343	77.0	74.1	50.7	6.8	25.9	16.3	0.0	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-20
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	
Green Bay MSA – Oconto County	20	3,258	100	382	84.1	69.9	49.7	4.7	30.1	11.3	0.00	
Total	20	3,258	100	382	84.1	69.9	49.7	4.7	30.1	11.3	0.00	
<i>Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Green Bay MSA – Oconto and Brown County	7	693,988	100	5,640	78.6	79.7	42.8	7.8	20.3	13.6	0.0	
Total	7	693,988	100	5,640	78.6	79.7	42.8	7.8	20.3	13.6	0.00	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

State of Michigan

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Non-MSA AA Michigan	301	50,361	100.0	604	0.0	0.0	0.0	17.7	19.6	22.2	45.5	32.2	36.9	36.9	48.2	40.9	0.0	0.0	0.0	
Total	301	50,361	100.0	604	0.0	0.0	0.0	17.7	19.6	22.2	45.5	32.2	36.9	36.9	48.2	40.9	0.0	0.0	0.0	

Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2020 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																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA AA Michigan	301	50,361	100.0	604	20.0	4.3	5.6	18.8	13.3	17.4	24.0	25.2	24.0	37.1	47.8	34.6	0.0	9.3	18.4	
Total	301	50,361	100.0	604	20.0	4.3	5.6	18.8	13.3	17.4	24.0	25.2	24.0	37.1	47.8	34.6	0.0	9.3	18.4	

Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA AA Michigan	26	1,742	100.0	170	0.0	0.0	0.0	17.8	37.0	11.8	56.2	43.3	60.0	26.0	19.7	28.2	0.0	0.0	0.0
Total	26	1,742	100.0	170	0.0	0.0	0.0	17.8	37.0	11.8	56.2	43.3	60.0	26.0	19.7	28.2	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA AA Michigan	26	1,742	100.0	170	77.2	79.0	61.8	6.8	21.0	16.0	0.0
Total	26	1,742	100.0	170	77.2	79.0	61.8	6.8	21.0	16.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%