



**PUBLIC DISCLOSURE**

October 20, 2025

**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's community development (CD) performance through CD loans, qualified investments, and services demonstrate adequate responsiveness to the CD needs in the bank's AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was more than reasonable.

The quarterly LTD ratio averaged 80.3 percent over the 12 quarters ended December 31, 2024. The bank ranks first in its peer group that includes two other similarly situated banks that have average LTD ratios of 74.3 percent and 65.3 percent, respectively. The banks in the peer group have assets that range from \$173 million to \$681 million, with the Stephenson National Bank and Trust being the largest. The banks in the peer group have assets that range from \$173 million to \$681 million, with the Stephenson National Bank and Trust (SNBT) being the largest.

### Lending in Assessment Area

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

The bank originated and purchased 87.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
Home Mortgage											
	2022-2023	337	84.7	61	15.3	398	45,540	73.1	16,785	26.9	62,325
	2024	130	82.3	28	17.7	158	21,773	75.4	7,114	24.6	28,887
<b>Subtotal</b>		<b>467</b>	<b>84.0</b>	<b>89</b>	<b>16.0</b>	<b>556</b>	<b>67,313</b>	<b>73.8</b>	<b>23,899</b>	<b>26.2</b>	<b>91,212</b>
Small Business											
	2022-2024	180	100.0	0	0.0	180	34,72134	100.0	0	0.0	34,721
<b>Subtotal</b>		<b>180</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>180</b>	<b>3434347,721</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>34,721</b>
<b>Total</b>		<b>647</b>	<b>87.9</b>	<b>89</b>	<b>12.1</b>	<b>736</b>	<b>102,034</b>	<b>81.0</b>	<b>23,899</b>	<b>19.0</b>	<b>125,933</b>

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

## Description of Institution

SNBT is a \$681 million multi-state 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-service branches, five of which are located in the state of Wisconsin, and one that is located in the state of Michigan. The bank also has a trust office in Marquette, Michigan and a Loan Production Office (LPO) in Green Bay, Wisconsin. The bank operates ATMs at all branch locations and has a deposit-taking ATM at the LPO.

The bank offers traditional commercial and residential loan products and serves the depository needs of its local community. The bank is primarily funded through core deposits, which total \$576 million, and net loans total \$472 million or 69.2 percent of assets as of December 31, 2024. By dollar volume, the loan portfolio is comprised of 63.0 percent commercial loans, 27.0 percent residential loans, 9.9 percent consumer loans, and less than 0.1 percent agricultural loans. Tier 1 capital totals \$65.1 million.

SNBT has three AAs that include 32 census tracts (CTs) located in Michigan and Wisconsin. The AAs are comprised of six CTs in Menominee County, Michigan; eight CTs in Oconto County, Wisconsin; and 12 CTs in Marinette County, 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.

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 September 12, 2022.

## 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 AAs through lending activities. The CD Test evaluates the bank's responsiveness to needs in its AAs 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 covered the period since the prior CRA examination. The Lending Test evaluated loans originated between January 1, 2022, and December 31, 2024, and the CD Test evaluated CD activities during the same period. January 1, 2022, through December 31, 2024. The Lending Test 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 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), if applicable, are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating 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, 2024. The state of Wisconsin received the most weight given the state of Wisconsin holds 86.0 percent of deposits, while the state of Michigan holds 12.9 percent of deposits. The remaining 1.2 percent of deposits are held in other states.

The state ratings in rating areas with a single AA are based on performance in that AA. The state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national 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<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans by income level of the geography.
- The bank exhibits a reasonable distribution of loans to businesses of different sizes.
- The bank exhibits adequate responsiveness to CD needs in the state through CD investments and services.
- The bank exhibits adequate responsiveness to CD needs in the state through CD loans.

### Description of Institution's Operations in Wisconsin

SNBT operates five full-service branches in Wisconsin, as well as an LPO in Green Bay, Wisconsin. Four branches are in Marinette County and one branch is in Oconto County. Three of the four Marinette County branches are in middle-income CTs and one branch is in a moderate-income CT. The Oconto County branch is in a moderate-income CT. All branches, as well as the LPO, have deposit-taking ATMs on site.

According to the 2024 Dun & Bradstreet SBSF Demographics, the Wisconsin non-MSA AA is comprised of 12 CTs, of which zero are low-income, two (16.7 percent) are moderate income, 10 (83.3 percent) are middle-income, and zero are upper-income. The total population of the AA is 41,872, which is comprised of 11,229 families. The number of families at each income level is 2,312 (20.6 percent) low-income, 2,341 (20.9 percent) moderate-income, 2,753 (24.5 percent) middle-income, and 3,823 (34.1 percent) upper-income. The median family income in the Wisconsin non-MSA AA is \$86,700. There are 30,910 total housing units in the geography, of which 14,274 (46.2 percent) are owner-occupied. There are 1,297 businesses in the AA, of which 73.3 percent report revenues less than \$1 million, 11.2 percent report revenues over \$1 million, and 15.6 percent do not have reported revenues available for 2024.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of December 31, 2025, SNBT ranks first among six other deposit taking institutions in the non-MSA AA with 35.3 percent of deposits. SNBT's largest competitor is Associated Bank, National Association, with 15.8 percent of deposits. Nicolet National Bank, the Peshtigo National Bank, and Farmers & Merchants Bank & Trust hold deposit share of 15.6 percent, 14.0 percent, and 11.6 percent of deposits, respectively.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

## Wisconsin Non-MSA

Assessment Area(s) - WI Non-MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.00	16.67	83.33	0.00	0.00
Population by Geography	41,872	0.00	16.95	83.05	0.00	0.00
Housing Units by Geography	30,910	0.00	35.94	64.06	0.00	0.00
Owner-Occupied Housing by Geography	14,274	0.00	18.89	81.11	0.00	0.00
Occupied Rental Units by Geography	4,595	0.00	13.36	86.64	0.00	0.00
Vacant Units by Geography	12,041	0.00	64.76	35.24	0.00	0.00
Businesses by Geography	1,297	0.00	14.26	85.74	0.00	0.00
Farms by Geography	101	0.00	24.75	75.25	0.00	0.00
Family Distribution by Income Level	11,229	20.59	20.85	24.52	34.05	0.00
Household Distribution by Income Level	18,869	27.30	16.73	20.52	35.45	0.00
Unemployment rate (%)	4.44	0.00	6.60	4.11	0.00	0.00
Households Below Poverty Level (%)	11.56	0.00	10.39	11.81	0.00	0.00
Median Family Income (Non-MSAs - WI)		\$71,403		Median Housing Value		\$131,100
Median Family Income (Non-MSAs - WI) for 2024		\$86,700		Median Gross Rent		\$672
				Families Below Poverty Level		7.56
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

### Employment and Economic Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics Report, annual unemployment rates in the AA ranged from 4.1 percent to 3.4 percent in 2022-23, compared to a statewide unemployment rate of 2.8 percent in 2022-23. In 2024, the annual unemployment rates in the AA was 4.0 percent, compared to a statewide unemployment rate of 3.0 percent.

### Scope of Evaluation in Wisconsin

For the state of Wisconsin, we completed a full-scope review of the non-MSA AA and a limited-scope review for the Green Bay MSA AA. 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 Wisconsin is reasonable.

### Conclusions for Area Receiving a Limited-Scope Review

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

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

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

### ***Home Mortgage Loans***

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

Refer to table 8 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans is reasonable.

#### 2022-23

The distribution of home mortgage loans is reasonable.

The proportion of lending in moderate-income geographies was less than the percentage of owner-occupied housing units and exceeded the aggregate distribution of all reporting lenders.

#### 2024

The distribution of home mortgage loans is reasonable.

The proportion of lending in moderate-income geographies was below the percentage of owner-occupied housing units and was less than the aggregate distribution of all reporting lenders.

### ***Small Loans to Businesses***

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

The distribution of small loans to businesses is reasonable.

#### 2022-23

The distribution of small loans to businesses is reasonable.

The proportion of lending to businesses in moderate-income geographies was less than the percentage of businesses and exceeded the aggregate distribution of all reporting lenders.

#### 2024

The distribution of small business loans is reasonable.

The proportion of lending to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies.

### ***Lending Gap Analysis***

We performed a lending gap analysis that included a review of sampled loans to businesses. We did not identify any unexplained, conspicuous gaps in lending.

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

The bank exhibited 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 8 in the state of Wisconsin section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans is reasonable.

#### 2022-23

The distribution of home mortgage loans is reasonable.

The proportion of lending to low-income borrowers was below the percentage of low-income families and the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers was in line with the percentage of families and was below the aggregate distribution of all reporting lenders.

#### 2024

The distribution of home mortgage loans is reasonable.

The proportion of lending to low-income borrowers was below the percentage of low-income families and was in line with the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers exceeded the percentage of moderate-income families and was in line with the aggregate distribution of all reporting lenders.

### ***Small Loans to Businesses***

Refer to table 10 in the state of Wisconsin section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small business loans is reasonable.

#### 2022-23

The distribution of small business loans is reasonable.

The proportion of lending to small businesses was near the percentage of small businesses and exceeded the aggregate distribution of all reporting lenders.

#### 2024

The distribution of small business loans is reasonable.

The proportion of lending to small businesses was near to the percentage of small businesses.

### Responses to Complaints

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

### Conclusions for Area Receiving Limited-Scope Review

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

### COMMUNITY DEVELOPMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited 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.

### Number and Amount of Community Development Loans

The CD 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.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Wisconsin Non-MSA	8	80.0	3,176	80.9
Green Bay MSA	2	20.0	750	19.1

The following are examples of CD loans the bank originated or purchased in this AA:

- Two loans, totaling \$1.25 million, to a school serving a majority of LMI students.
- One loan, totaling \$500 thousand, for economic development for stabilization of a moderate-income CT.
- One loan, totaling \$250 thousand, to a nonprofit elder care facility that accepts public funding and whose purpose is to support LMI patients.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Wisconsin Non-MSA	0	0	108	\$110	108	93.1	110	94.0	0	0
Green Bay MSA	0	0	8	\$7	8	6.9	7	6.0	0	0
Total	0	0	116	\$117	116	100.0	117	100.0		

The number of CD investments is adequate, relative to the investment opportunities available in the AAs. The bank's qualified investments included 116 donations to 51 different organizations that support economic development, affordable housing initiatives, and community services targeted towards LMI individuals and geographies.

The following are examples of qualified investments in the AA:

- A donation to an organization providing financial support for foster parents.
- A donation to an organization providing housing for LMI individuals.

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

SNBT demonstrated adequate responsiveness to the CD service needs of its AAs, relative to the opportunities in the area. During the evaluation period, SNBT employees provided financial expertise and technical assistance to several CD organizations that serve the bank's AAs. These organizations focus on AA needs for affordable housing, economic development, and providing services to LMI individuals.

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

- Employees taught financial literacy programs to high school and elementary students.
- Members of the bank's executive management team serve in the capacity of president and treasurer of a business development corporation.
- Various employees serve on boards in both Wisconsin and Michigan AAs to aid in financial assistance programs for students.

### Conclusions for Area Receiving a Limited-Scope Review

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

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

## State Rating

### State of Michigan

#### **CRA rating for the State of Michigan<sup>2</sup>: Satisfactory**

**The Lending Test is rated: Satisfactory**

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

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans by income level of the geography.
- The bank exhibits a reasonable distribution of loans to businesses of different sizes.
- The bank exhibits adequate responsiveness to CD needs in the state through CD investments and services.
- The bank exhibits adequate responsiveness to CD needs in the state through CD loans.

#### **Description of Institution's Operations in Michigan**

SNBT operates one full-service branch and one trust office in the state of Michigan. The full-service branch is in Menominee, Michigan and the trust office is in Marquette, Michigan. The full-service branch is in a middle-income CT and has an onsite ATM, while the trust office is not included in the bank's AA, does not take deposits, and does not have an onsite ATM.

According to the 2024 Dun & Bradstreet SBSF Demographics, the bank's AA is comprised of 6 CTs, of which zero are low-income, one (16.7 percent) is moderate income, five (83.3 percent) are middle-income, and zero are upper-income. The total population of the AA is 20,042, which is comprised of 5,214 families. The number of families at each income level is 876 (16.8 percent) low-income, 1,158 (22.2 percent) moderate-income, 1,258 (24.1 percent) middle-income, and 1,924 (36.9 percent) upper-income. The median family income in the Michigan non-MSA AA is \$78,300. The total housing units in the geography are 12,051, of which 6,918 (57.4 percent) are owner-occupied. There are 543 businesses in the AA, of which 68.0 percent report revenues less than \$1 million, 15.5 percent report revenues over \$1 million, and 16.6 percent do not have reported revenues available for 2024.

According to the FDIC Deposit Market Share Report as of December 31, 2025, SNBT ranks second among five deposit taking institutions in the non-MSA AA with 33.3 percent of deposits. SNBT's largest competitor is Flagstar Bank, National Association with 36.6 percent of deposits. Nicolet National Bank, the First National Bank & Trust, and Northern Interstate Bank hold deposit share of 14.4 percent, 10.7 percent, and 5.0 percent of deposits, respectively.

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<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

## Michigan Non-MSA

Assessment Area(s) - MI Non-MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.00	16.67	83.33	0.00	0.00
Population by Geography	20,042	0.00	11.65	88.35	0.00	0.00
Housing Units by Geography	12,051	0.00	16.03	83.97	0.00	0.00
Owner-Occupied Housing by Geography	6,918	0.00	12.92	87.08	0.00	0.00
Occupied Rental Units by Geography	2,016	0.00	6.94	93.06	0.00	0.00
Vacant Units by Geography	3,117	0.00	28.81	71.19	0.00	0.00
Businesses by Geography	543	0.00	9.58	90.42	0.00	0.00
Farms by Geography	32	0.00	21.88	78.13	0.00	0.00
Family Distribution by Income Level	5,214	16.80	22.21	24.13	36.86	0.00
Household Distribution by Income Level	8,934	24.48	17.45	21.07	37.00	0.00
Unemployment rate (%)	5.12	0.00	2.41	5.46	0.00	0.00
Households Below Poverty Level (%)	12.06	0.00	10.54	12.25	0.00	0.00
Median Family Income (Non-MSAs - MI)		\$63,042			Median Housing Value	\$121,300
Median Family Income (Non-MSAs - MI) for 2024		\$78,300			Median Gross Rent	\$597
					Families Below Poverty Level	7.00

FFIEC File - 2024 Census  
 2024 Dun & Bradstreet SBSF Demographics  
 Due to rounding, totals may not equal 100.0%  
 (\*) The NA category consists of geographies that have not been assigned an income classification

### Economic and Other Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics Report, the annual unemployment rate in Menominee, Michigan was 4.1 percent in 2022, compared to a statewide unemployment rate of 4.2 percent in 2022. In 2024, the unemployment rate in the four counties ranged from 3.8 percent to 5.3 percent, compared to a statewide unemployment rate of 4.7 percent.

### Scope of Evaluation in Michigan

The non-MSA AA is the only AA in the state of Michigan, and it 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 was reasonable.

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

The bank exhibited a reasonable geographic distribution of loans in the state.

### ***Home Mortgage Loans***

Refer to table 7 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.

The distribution of home mortgage loans is reasonable.

#### 2022-23

The distribution of home mortgage loans is reasonable.

The proportion of lending in moderate-income geographies exceeded the percentage of owner-occupied housing units and was below the aggregate distribution of all reporting lenders.

#### 2024

The distribution of home mortgage loans is excellent.

The proportion of lending in moderate-income geographies exceeded the percentage of owner-occupied housing units and was above the aggregate distribution of all reporting lenders.

### ***Small Loans to Businesses***

Refer to table 9 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.

The distribution of small loans to businesses is reasonable.

#### 2022-23

The distribution of small loans to businesses is reasonable.

The proportion of lending to businesses in moderate-income geographies was less than the percentage of businesses but was above the aggregate distribution of all reporting lenders.

#### 2024

The distribution of small business loans is excellent.

The proportion of lending to businesses in moderate-income geographies exceeded the percentage of businesses and the aggregate distribution in moderate-income geographies.

### ***Lending Gap Analysis***

We performed a lending gap analysis that included a review of sampled loans to businesses. We did not identify any unexplained, conspicuous gaps in lending.

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

The bank exhibited a 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 8 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.

The distribution of home mortgage loans is reasonable.

#### 2022-23

The distribution of home mortgage loans is poor.

The proportion of lending to low-income borrowers was below the percentage of low-income families and the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers was below the percentage of families and the aggregate distribution of all reporting lenders.

#### 2024

The distribution of home mortgage loans is reasonable.

The proportion of lending to low-income borrowers was below the percentage of low-income families and the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers exceeded the percentage of moderate-income families and was below the aggregate distribution of all reporting lenders.

### ***Small Loans to Businesses***

Refer to table 10 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.

The distribution of small business loans is reasonable.

#### 2022-23

The distribution of small business loans is reasonable.

The proportion of lending to small businesses was near both the percentage of small businesses and exceeded the aggregate distribution of all reporting lenders.

#### 2024

The distribution of small business loans is reasonable.

The proportion of lending to small businesses was near to the percentage of small businesses.

### **Responses to Complaints**

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

## COMMUNITY DEVELOPMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope and limited-scope review, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

### Number and Amount of Community Development Loans

SNBT's CD lending record reflects adequate responsiveness to identifying and addressing the credit needs in the Michigan non-MSA. The bank did not originate new CD loans within the Michigan non-MSA AA during our assessment period due to lack of opportunity within the county; however, they did originate approximately \$3 million in qualifying CD loans in adjacent Marinette County, Wisconsin. The counties border one another along the Wisconsin-Michigan border and have a shared economy, with a majority of the population living in the Wisconsin non-MSA AA.

### Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Michigan Non-MSA	0	0	42	53	42	100.0	53	100.0	0	0

The number of CD investments is adequate, relative to the investment opportunities available in the AAs. The bank's qualified investments included 42 donations to 19 different organizations that support economic development, affordable housing initiatives, and community services targeted towards LMI individuals and geographies.

The following are examples of qualified investments in the AA:

- A donation to an organization providing LMI housing for disabled and elderly residents.
- A donation to an organization providing housing for unhoused individuals within the AA.

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

SNBT demonstrated adequate responsiveness to the CD service needs of its AAs, relative to the opportunities in the area. During the evaluation period, 61 SNBT employees provided financial expertise and technical assistance to CD organizations that serve the bank's AAs. These organizations focus on AA needs for affordable housing, economic development, and provide services to LMI individuals.

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

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

- An employee serves as an instructor for a financial literacy initiative providing financial literacy courses to inmates.
- Multiple employees serve on various planning commissions within the AA.
- A member of executive management serves as the town treasurer for a town within the AA.

## 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>	1/1/2022 – 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans. Community development loans, qualified investments, community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<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>Wisconsin</b>		
Non-MSA	Full-Scope	All of Marinette County
Green Bay MSA	Limited-Scope	Portion of Oconto County and Brown County
<b>Michigan</b>		
Michigan Non-MSA	Full-Scope	Portion of Menominee County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
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

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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 the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, 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 CD loans and qualified investments, branch distribution, and CD services).

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

## Appendix D: Tables of Performance Data

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

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.

# State of Wisconsin

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Green Bay MSA	45	9,009	17.65	17,208	0.20	2.22	0.34	18.63	37.78	20.82	55.23	48.89	52.57	25.94	11.11	26.28	--	--	--
WI Non-MSA	210	26,837	82.35	2,313	--	--	--	18.89	22.38	25.46	81.11	77.62	74.54	--	--	--	--	--	--
<b>Total</b>	<b>255</b>	<b>35,845</b>	<b>100.00</b>	<b>19,521</b>	<b>0.17</b>	<b>0.39</b>	<b>0.30</b>	<b>18.67</b>	<b>25.10</b>	<b>21.37</b>	<b>59.19</b>	<b>72.55</b>	<b>55.17</b>	<b>21.96</b>	<b>1.96</b>	<b>23.16</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- 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		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Green Bay MSA	19	6,075	18.45	7,901	0.20	--	0.29	18.63	21.05	21.49	55.23	68.42	52.36	25.94	10.53	25.86	--	--	--
WI Non-MSA	84	14,351	81.55	1,133	--	--	--	18.89	28.57	25.42	81.11	71.43	74.58	--	--	--	--	--	--
<b>Total</b>	<b>103</b>	<b>20,427</b>	<b>100.00</b>	<b>9,034</b>	<b>0.17</b>	<b>--</b>	<b>0.25</b>	<b>18.67</b>	<b>27.18</b>	<b>21.98</b>	<b>59.19</b>	<b>70.87</b>	<b>55.15</b>	<b>21.96</b>	<b>1.94</b>	<b>22.61</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- 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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Green Bay MSA	45	9,009	17.65	17,208	18.99	4.44	11.33	18.84	26.67	22.33	23.18	17.78	24.01	39.00	31.11	31.04	--	20.00	11.30
WI Non-MSA	210	26,837	82.35	2,313	20.73	13.33	11.72	20.95	16.67	22.44	24.53	14.29	21.40	33.78	40.95	30.13	--	14.76	14.31
<b>Total</b>	<b>255</b>	<b>35,845</b>	<b>100.00</b>	<b>19,521</b>	<b>19.21</b>	<b>11.76</b>	<b>11.37</b>	<b>19.11</b>	<b>18.43</b>	<b>22.34</b>	<b>23.35</b>	<b>14.90</b>	<b>23.70</b>	<b>38.32</b>	<b>39.22</b>	<b>30.94</b>	<b>--</b>	<b>15.69</b>	<b>11.65</b>

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Green Bay MSA	19	6,075	18.45	7,901	18.99	10.53	7.80	18.84	26.32	21.87	23.18	21.05	22.73	39.00	21.05	34.58	--	21.05	13.02
WI Non-MSA	84	14,351	81.55	1,133	20.59	10.71	9.62	20.85	15.48	25.51	24.52	20.24	21.45	34.05	44.05	28.42	--	9.52	15.00
<b>Total</b>	<b>103</b>	<b>20,427</b>	<b>100.00</b>	<b>9,034</b>	<b>19.20</b>	<b>8.03</b>	<b>8.26</b>	<b>19.10</b>	<b>22.33</b>	<b>22.42</b>	<b>23.35</b>	<b>22.57</b>	<b>22.50</b>	<b>38.36</b>	<b>33.81</b>	<b>33.82</b>	<b>--</b>	<b>13.27</b>	<b>13.00</b>

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Green Bay MSA	40	12,196	66.85	9,892	1.48	--	1.33	24.69	40.00	23.52	48.71	32.50	47.94	25.12	27.50	27.20	--	--	--
WI Non-MSA	40	6,047	33.15	939	--	--	--	14.00	7.5	18.10	86.00	92.50	81.90	--	--	--	--	--	--
<b>Total</b>	<b>80</b>	<b>18,243</b>	<b>100.00</b>	<b>10,831</b>	<b>1.30</b>	<b>--</b>	<b>1.22</b>	<b>23.40</b>	<b>47.50</b>	<b>23.05</b>	<b>53.22</b>	<b>62.50</b>	<b>50.88</b>	<b>22.08</b>	<b>13.75</b>	<b>24.85</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- 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.

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Green Bay MSA	20	3,919	53.63	--	1.46	--	--	25.16	30.00	--	48.41	55.00	--	24.97	15.00	--	--	--	--
WI Non-MSA	20	3,388	46.37	--	--	--	--	14.26	15.00	--	85.74	85.00	--	--	--	--	--	--	--
<b>Total</b>	<b>40</b>	<b>7,307</b>	<b>100.00</b>	<b>--</b>	<b>1.28</b>	<b>--</b>	<b>--</b>	<b>23.84</b>	<b>22.50</b>	<b>--</b>	<b>52.94</b>	<b>70.00</b>	<b>--</b>	<b>21.94</b>	<b>7.50</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Green Bay MSA	40	12,196	66.85	9,892	81.43	77.50	52.75	6.38	22.50	12.19	--
WI Non-MSA	40	6,047	33.15	939	79.69	77.50	56.66	5.54	22.50	14.77	--
<b>Total</b>	<b>80</b>	<b>18,243</b>	<b>100.00</b>	<b>10,831</b>	<b>81.22</b>	<b>77.50</b>	<b>53.09</b>	<b>6.28</b>	<b>22.50</b>	<b>12.50</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Green Bay MSA	20	3,919	53.63	--	74.82	75.00	--	11.94	25.00	13.25	--
WI Non-MSA	20	3,388	46.37	--	73.25	60.00	--	11.18	40.00	15.57	--
<b>Total</b>	<b>40</b>	<b>7,307</b>	<b>100.00</b>	<b>--</b>	<b>74.63</b>	<b>67.50</b>	<b>--</b>	<b>11.85</b>	<b>32.50</b>	<b>13.53</b>	<b>--</b>

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- 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.

# State of Michigan

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
MI Non-MSA	98	13,877	100.00	686	--	--	--	28.52	24.49	24.34	71.48	75.51	75.66	--	--	--	--	--	--
<b>Total</b>	<b>98</b>	<b>13,877</b>	<b>100.00</b>	<b>686</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>28.52</b>	<b>24.49</b>	<b>24.34</b>	<b>71.48</b>	<b>75.51</b>	<b>75.66</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
MI Non-MSA	354	947	100.00	314	--	--	--	12.92	8.57	11.78	87.08	91.43	88.22	--	--	--	--	--	--
<b>Total</b>	<b>354</b>	<b>947</b>	<b>100.00</b>	<b>314</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>12.92</b>	<b>8.57</b>	<b>11.78</b>	<b>87.08</b>	<b>91.43</b>	<b>88.22</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.  
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Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
MI Non-MSA	98	13,877	100.00	686	18.01	5.10	9.62	22.48	18.37	23.76	24.24	23.47	19.83	35.27	41.84	28.57	--	11.22	18.22
<b>Total</b>	<b>98</b>	<b>13,877</b>	<b>100.00</b>	<b>686</b>	<b>18.01</b>	<b>5.10</b>	<b>9.62</b>	<b>22.48</b>	<b>18.37</b>	<b>23.76</b>	<b>24.24</b>	<b>23.47</b>	<b>19.83</b>	<b>35.27</b>	<b>41.84</b>	<b>28.57</b>	<b>--</b>	<b>11.22</b>	<b>18.22</b>

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Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
MI Non-MSA	35	4,947	100.00	314	16.80	2.86	9.24	22.21	22.86	26.43	24.13	14.29	20.38	36.86	54.29	27.07	--	5.71	16.88
<b>Total</b>	<b>35</b>	<b>4,947</b>	<b>100.00</b>	<b>314</b>	<b>16.80</b>	<b>2.86</b>	<b>9.24</b>	<b>22.21</b>	<b>22.86</b>	<b>26.43</b>	<b>24.13</b>	<b>14.29</b>	<b>20.38</b>	<b>36.86</b>	<b>54.29</b>	<b>27.07</b>	<b>--</b>	<b>5.71</b>	<b>16.88</b>

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Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MI Non-MSA	40	5,400	100.00	316	--	--	--	23.14	32.50	29.75	76.86	67.50	70.25	--	--	--	--	--	--
<b>Total</b>	<b>40</b>	<b>5,400</b>	<b>100.00</b>	<b>316</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>23.14</b>	<b>--</b>	<b>29.75</b>	<b>76.86</b>	<b>--</b>	<b>70.25</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
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Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MI Non-MSA	203,771		100.00	--	--	--	--	9.58	25.00	--	90.42	75.00	--	--	--	--	--	--	--
<b>Total</b>	<b>203,771</b>	<b>100.00</b>	--	--	--	--	--	<b>9.58</b>	25.00	--	<b>90.42</b>	75.00	--	--	--	--	--	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MI Non-MSA	405,400		100.00	316	65.26	62.50	54.43	17.05	37.50	17.68	--
<b>Total</b>	<b>405,400</b>	<b>100.00</b>	<b>316</b>	<b>65.26</b>	62.50	<b>54.43</b>	<b>17.05</b>	37.50	<b>17.68</b>	--	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MI Non-MSA	203,771		100.00	--	67.96	90.00	--	15.47	10.00	16.57	--
<b>Total</b>	<b>203,771</b>	<b>100.00</b>	--	<b>67.96</b>	90.00	--	<b>15.47</b>	10.00	<b>16.57</b>	--	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
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