



PUBLIC DISCLOSURE

April 3, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BMO Harris Bank N.A.
(known as BMO Bank N.A. after September 3, 2023)
Charter Number: 14583

320 South Canal Street
Chicago, Illinois 60606

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street
Washington, DC 20219

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

Table of Contents

Overall CRA Rating	3
Description of Institution.....	4
Scope of the Evaluation.....	6
Discriminatory or Other Illegal Credit Practices Review	11
Multistate Metropolitan Statistical Area Ratings	12
Chicago-Naperville-Elgin, IL-IN-WI (Chicago) MMSA	12
Kansas City, MO-KS (Kansas City) MMSA	24
Minneapolis-St. Paul-Bloomington, MN-WI (Minneapolis) MMSA	34
St. Louis, MO-IL (St. Louis) MMSA	44
State Ratings.....	54
State of Arizona	54
State of Florida.....	74
State of Illinois	86
State of Indiana	96
State of Kansas.....	109
State of Missouri	117
State of Wisconsin	125
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations	C-1
Appendix D: Tables of Performance Data	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of BMO Harris Bank N.A. (BHB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	BMO Harris Bank N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

The Lending Test rating is based on performance across all rating areas. The overall conclusions are a weighted average, based on deposits, of the four multi-state metropolitan statistical area (MMSA) and seven state ratings, with the performance in the Chicago MMSA assessment area (AA) carrying the greatest weight.

The Investment Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.

The Service Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.

Lending in Assessment Areas

A majority of BHB's loans were in its AAs. Examiners considered the impact of the nationwide lending performed by the BMO Transportation Finance (BMOTF) line of business. Please refer to the Description of Institution section for additional information on BMOTF.

BHB originated and purchased 52.8 percent of its total loans inside its AAs during the evaluation period. When excluding BMOTF loans, the percentage increases to 89.9 percent. Examiners performed this analysis at the bank, rather than the AA, level. These percentages did not include extensions of credit by affiliates that examiners may consider under the other performance criteria.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	34,564	86.8	5,236	13.2	39,800	7,313,878	64.2	4,075,013	35.8	11,388,891
Small Business	58,137	42.8	77,684	57.2	135,821	5,113,450	36.3	8,984,254	63.7	14,097,704
Small Farm	1,257	50.7	1,224	49.3	2,481	87,219	41.0	125,492	59.0	212,711
Total	93,958	52.8	84,144	47.2	178,102	12,514,547	48.7	13,184,759	51.3	25,699,306

Lending Inside and Outside of the Assessment Areas excluding BMOTF loans										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	34,564	86.8	5,236	13.2	39,800	7,313,878	64.2	4,075,013	35.8	11,388,891
Small Business	43,123	92.6	3,469	7.4	46,592	3,229,428	86.5	505,657	13.5	3,735,085
Small Farm	1,145	90.0	127	10.0	1,272	77,825	81.6	17,602	18.4	95,427
Total	78,832	89.9	8,832	10.1	87,664	10,621,131	69.8	4,598,272	30.2	15,219,403

Description of Institution

BMO Harris Bank N.A. (BHB or bank), headquartered in Chicago, Illinois, is a full-service interstate commercial bank that is a wholly owned subsidiary of BMO Financial Corporation (BFC). BFC is a wholly owned subsidiary of BMO Financial Group (BFG). BFG is a highly diversified North American based financial services provider headquartered in Toronto, Canada with over \$1.1 trillion Canadian in assets as of January 31, 2023. BHB has one banking affiliate, BMO Harris Central, N.A., which is a special purpose cash management bank, offering delivery of controlled disbursement account services for corporate customers. BHB management opted not to include any activities of this affiliate in this performance evaluation (PE).

BHB had total assets of almost \$177 billion as of December 31, 2022. This included total loans and leases of \$100.8 billion that consisted of \$39.7 billion (39.3 percent of loans and leases) in commercial loans, \$29.1 billion (28.9 percent) in other loans, \$23.3 billion (23.1 percent) in real-estate related loans, \$ 8.4 billion (8.3 percent) in individual loans, and \$340.5 million (0.3 percent) in agricultural loans. Total tier 1 capital as of December 31, 2022, was almost \$19 billion.

As of December 31, 2022, BHB had a network of 504 branch office locations and 1,466 automated teller machines (ATMs), of which 716 were deposit-taking, in nine states that included Arizona, Florida, Illinois, Indiana, Kansas, Minnesota, Missouri, Texas, and Wisconsin. This PE contains the evaluation of BHB's performance within 33 AAs in seven states and four MMSA rating areas.

On January 17, 2022, BHB filed an application requesting approval to merge Bank of the West (BOTW), a state-chartered nonmember bank, with and into BHB, with BHB as the surviving institution. BHB also sought permission to retain and operate the main office and branches of BOTW as licensed branches of BHB and to retain and operate as operating subsidiaries certain BOTW subsidiaries. The

OCC approved the application on January 17, 2023, and the merger finalized on February 2, 2023. Examiners did not include data from BOTW in this evaluation.

BHB has a licensed branch in the Dallas-Plano-Irving, TX Metropolitan Statistical Area (MSA). While BHB received a full-service branch license, this is a commercial branch located in the existing commercial banking office in Dallas, Texas. The branch serves as a physical location, required per state of Texas regulatory rules, to accept escrow deposits from certain business types (e.g., title insurance companies). BHB does not accept retail deposits or originate retail loans from this location. Examiners did not include an analysis of this MSA in this PE.

BHB offers a broad range of real estate, commercial, and consumer credit products; deposit products and services; and trust, investment, and financial advisory services to personal, business, corporate, and institutional clients. BHB's personal banking products and services include checking accounts, statement savings accounts, money market accounts, and certificates of deposit; fixed and adjustable-rate mortgages; credit cards; retirement accounts and investments; home equity, personal loans and lines of credit; and auto loans. BHB's business banking products and services include business checking and savings accounts, and certificates of deposit; business loans, business real estate loans, and government loan programs; and, receivables management, payables management, payroll processing, and merchant services.

The BMOTF line of business is one of the largest commercial truck and trailer financiers in North America. The customers served include original equipment manufacturers, dealers, for-hire and private fleets, and waste and recycling companies located throughout the United States. The equipment financed includes heavy-duty tractors and trailers, medium-duty vehicles, alternative-fuel vehicles, and waste and recycling collection vehicles and equipment. Many of these loans meet the Consolidated Report of Condition and Income (Call Report) definition of small loans to business or small loans to farms which BHB reported under the CRA, and examiners analyzed as such. Examiners considered the impact of this portfolio on the small loans to businesses and small loans to farms analyses in those AAs that had a high percentage of these accounts.

In early 2020, the corona virus (COVID-19) pandemic led to a public health emergency that severely impacted the national economy. COVID-19 had spread worldwide and caused deteriorating economic conditions resulting from mandated stay-at-home orders and business shutdowns used to slow the spread of the virus. BHB adapted to changing needs and priorities, providing essential banking products and services to customers during the pandemic. Specifically, BHB enhanced its digital banking capabilities allowing customers impacted by stay-at-home orders to conduct their banking activities remotely. BHB participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), which provided small businesses impacted by the pandemic with funds to cover payroll costs or other expenses. BHB originated over 33,000 PPP loans totaling over \$4 billion. BHB also partnered with a COVID resource organization that provided customers and employees with service referrals to organizations that could help with their financial and other needs.

Currently, there are no financial impediments to BHB's ability to help meet the credit needs within its communities.

The OCC assigned BHB an overall Outstanding rating for its last CRA evaluation dated April 6, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated home mortgage loans; small loans to businesses and farms; community development (CD) loans; qualified investments; and CD and retail services from January 1, 2020, through December 31, 2022 (the evaluation period). Examiners did not consider consumer loans in this evaluation, as consumer lending was not a substantial majority of BHB's business and management did not request consideration. Examiners did not include any information from BOTW as the merger occurred after the end date of the evaluation period. Examiners considered qualifying activities performed in response to the significant impact of the COVID pandemic across the United States that occurred during the evaluation period. This included consideration of loans made under the SBA's PPP as either small loans to businesses or farms under the borrower and geographic distribution of lending analysis, or as CD loans, depending on their size.

Due to updated 2020 Census data, census tract income level designation changes became effective January 1, 2022. Examiners must analyze loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage loans and small loans to businesses and farm data from January 1, 2020, through December 31, 2021 (2020-2021 evaluation period), using 2015 American Community Survey (ACS) demographic information. Examiners analyzed home mortgage loans and small loans to businesses and farms data from January 1, 2022, through December 31, 2022 (2022 evaluation period), using 2020 Census demographic information. Unless otherwise noted in a specific rating area, examiners placed more weight on the 2020-2021 evaluation period as it covered more of the overall evaluation period and had comparisons to both demographic and aggregate data. Examiners included narrative discussions and data in the tables in Appendix D for both periods.

On June 5, 2020, the OCC published a modernized CRA Rule. The June 2020 CRA Rule was subsequently rescinded on December 14, 2021. The Rule was in effect from October 1, 2020, until December 31, 2021. While in force, the rule expanded bank lending, investment, and services activities that qualified for positive CRA consideration. This included other activities that met the credit needs of economically disadvantaged individuals and entities, low- and moderate-income geographies, and other identified areas of need in banks' communities. The 2020 CRA Rule also expanded the circumstances in which banks received pro-rata consideration for qualifying activities beyond those activities that received consideration under the current framework. Certain CD activities that provided some benefit to, but did not primarily benefit, specified populations, entities, or areas would receive pro-rata credit equal to the partial benefit provided. Finally, the June 2020 CRA Rule allowed for allocation of an activity across all of a bank's AAs and other MSAs or non-MSAs served by the activity according to the share of the bank's deposits in those areas, to the extent the bank cannot document that the services or funding it provided was allocated to a particular project. An activity that met these qualifying criteria under the June 2020 CRA rule that BHB conducted between October 1, 2020, and December 31, 2021, remained a qualifying activity even after rescission of the June 2020 CRA rule and were included in this evaluation. Examiners listed CD services considered under the expanded June 2020 CRA rule that did not fall into a current CD service criteria as "general qualified volunteer activities."

There were no MSA boundary changes introduced by the Office of Management and Budget during the evaluation period that affected any of BHB's AAs.

Lending Test

Generally, examiners did not perform statistical analysis or draw conclusions for a loan product if there were less than 20 originated or purchased loans in an AA. However, BHB had one rating area, the state of Kansas, where examiners completed analysis even though there were only 19 small loans to businesses to determine a Lending Test conclusion. In most markets, BHB made few, if any, small loans to farms as farm lending was not a primary product for the bank. Some of the bank's AAs that contain more rural geographies had enough small loans to farms to analyze. Due to the limited number of farms in low- and moderate-income geographies, small farm lending had no material impact on the Lending Test conclusion. If examiners included an analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area.

Examiners determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product's market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

For lending performance, the loan distribution analyses compared originated and purchased home mortgage loans, small loans to businesses, and small loans to farms to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrates how the bank is performing compared to other lenders in the AA and provides context on the reasonableness of the bank's performance. Examiners excluded BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYWI1W2K3), and BMO Harris Bank N.A. (10000014583) when determining aggregate percentages.

For the 2020-2021 evaluation period, for both home mortgage loans and small loans to businesses, examiners placed more emphasis on borrower and geographic demographic distributions than on aggregate performance. Borrower and geographic demographic comparators covered both years of the evaluation period where aggregate comparators included only data from 2021. For the 2022 evaluation period, for home mortgage loans, examiners placed equal emphasis on demographic and aggregate distributions. For small loans to business, examiners concluded only on demographic data, as 2022 business aggregate data was not available at the time of the evaluation. If 2022 performance was stronger or weaker than 2020-2021 performance, only those factors that impacted the conclusion were listed. All other comparator performances were consistent.

Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated examiners consider one component more than the other. When there were differences in performance between loan products in a specific AA, examiners determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount. When there were performance differences between low- and moderate-income geographies, examiners placed more emphasis on the geographic category with more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). Examiners described any variations within the narrative comments of each rating area.

For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-income individuals and families. Additionally, examiners considered the impact of home affordability

for low- and moderate-income borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. In these higher cost markets, it is difficult for many low- and moderate-income borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

BHB originated a substantial volume of PPP loans during the evaluation period. Between 2020 and 2021, the bank originated more than 32,000 PPP loans totaling \$2.4 billion within the bank's AAs. Examiners considered those loans that met the Call Report definition of a loan to small businesses or small farms as part of the Lending Test as small loans to businesses or small loans to farms. For 77.5 percent of these PPP loans, BHB did not collect revenue information as revenue information was not a requirement of the PPP lending program. As a result, BHB had a substantially higher volume of small business loans with revenues not reported in each of its full-scope AAs. Interagency guidance stated: "When evaluating CRA performance, the agencies will take into account the unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency and will not penalize a bank for making a large volume of loans for which gross annual revenue information is not available." To fully consider the bank's lending patterns within the context of the PPP program, examiners analyzed bank performance including and excluding PPP loans for which revenue was unavailable or uncollected. This performance context generally resulted in more positive performance when considering the Distribution of Loans by Income Level of the Borrower for small businesses and small farms in most AAs. Examiners described the impact of this analysis in the Lending Test section of each full-scope AA. BHB originated an additional 648 PPP loans, totaling almost \$1.6 billion, that also received consideration as CD within their AAs.

The lending analysis also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex or responsive to AA needs. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. To provide perspective, CD lending volume was compared to the quarterly average of tier 1 capital over the evaluation period allocated to the AA or rated area based on the pro rata share of bank deposits attributed to that area.

BHB used innovative and/or flexible lending programs to serve AA credit needs during the evaluation. BHB participated in over 200 programs offered by local governments, non-profit organizations, and affordable housing agencies throughout its AAs. Examples included: various state housing finance agency (HFA) programs, Freddie Mac Home Possible Program (Home Possible), Neighborhood Home Loan Product (NHLP), Federal Housing Authority (FHA) loans, and down payment and closing cost assistance from the Federal Home Loan Bank of Chicago affordable housing and down payment assistance programs (DPAs). In addition, BHB established a self-funded grant program (BHB grants) that provided up to \$3,000 in down payment or closing cost assistance. Borrowers could combine the grants with a wide array of affordable mortgage products or external down payment assistance programs. These products and programs complement the bank's existing suite of products, which examiners considered in the "Product Innovation and Flexibility" section for those AAs that had significant activity in these products.

Investment Test

The analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as its primary purpose. Qualified investments included investments that met the definition of CD that BHB made in the current evaluation period or prior to the current evaluation period and were still outstanding. Examiners considered prior-period investments at

the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. BHB received consideration for any qualified investment activity that benefited a specific AA in the applicable state or MMSA rating area. This included investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered broader statewide or regional activities that did not serve an AA only if the bank had reasonably served the needs of its AAs.

To provide perspective regarding the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to the quarterly average of tier 1 capital over the evaluation period allocated to each AA based on its pro rata share of deposits. The complexity and innovativeness of investments were typical for an institution of this size and capacity.

Service Test

The review of services during the evaluation period included analyzing BHB's network of branches and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. Examiners gave the most weight to the geographic distribution of bank branches and changes in branch locations.

The analysis of the distribution of the bank's retail branches was based on locations as of December 31, 2022. Income category classifications were based on the 2020 Census. When applicable, examiners considered changes to the branch distribution in an AA that resulted solely from a geography's income classification changing from the 2015 ACS to the 2020 census.

In the full-scope AAs, examiners reviewed branch locations in middle- and upper-income geographies that served and improved access for low- and moderate-income customers or customers in low- and moderate-income geographies in one of two ways. Examiners gave positive consideration when a middle- and upper-income branch was "across the street" (less than 1,000 feet) from a low- or moderate-income geography. Examiners also considered middle- and upper-income branches that showed that the branch served low- and moderate-income customers. Examiners reviewed maps showing significant numbers (over 50 percent) of both retail and small business customers located in low- or moderate-income geographies with either a deposit or lending relationship at a branch in a near-by middle- or upper-income geography. Examiners considered each middle- and upper-income branch only once.

BHB offered other alternative delivery systems (ADS) including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options that increased accessibility for both retail and business customers. Examiners positively considered ADS usage where bank data demonstrated that systems usage, including online banking or the bank's mobile application, by low- and moderate-income customers was high (over 50 percent) as of the fourth quarter of 2022 and/or had significantly increased (50 percent or more) over the evaluation period. Examiners also considered the extent and innovativeness of BHB's CD services in meeting the credit needs within its AAs.

BHB continues to offer its SMART Money Checking account that the bank developed in response to the Consumer Financial Protection Bureau's (CFPB) request of banks to offer a deposit account for the un- and under-banked. This no-overdraft, low-fee account was simple, transparent, and available to those with low QualiFile scores. In 2021, SMART Money became Bank On certified by the Cities for Financial Empowerment Fund. During the evaluation period, the bank opened over 68,580 of these accounts with 39 percent opened in branches located in, or adjacent to, low- and moderate-income

geographies. BHB also offers the Credit Builder loan program that helped individuals begin to establish or repair credit. This was a certificate-of-deposit account secured loan that served a dual function for savings and credit establishment. At loan maturity, the borrower receives the full account balance plus accrued interest in addition to establishing credit that BHB reported to all three credit reporting agencies. During the evaluation period, BHB opened 3,336 of these accounts totaling \$4.5 million. Examiners considered these products in the Retail Banking Services section of every full-scope AA.

Selection of Areas for Full-Scope Review

In each state where the bank had an office, examiners selected one or more AAs within that state for a full-scope review. For purposes of this evaluation, examiners combined and evaluated bank delineated AAs located within the same MSA or MMSA as a single AA. Similarly, examiners combined and evaluated bank delineated non-MSA AAs within the same state as a single AA. Examiners may evaluate these combined AAs using full- or limited-scope procedures.

When determining areas for full-scope reviews, examiners considered factors such as BHB's percentage of deposits within the rating area; business strategy within a particular MMSA or state; the number of branches; the volume of reportable loans originated and purchased in each state and/or MMSA; the significance of the bank to the AA based on its deposit market share and rank; comments received from the public; and conclusions from prior CRA evaluations. Where necessary, examiners selected multiple AAs to complete sufficient full-scope analyses to support the conclusions and ratings. Refer to the "Scope" section under each State Rating section for details regarding how examiners selected full-scope AAs. 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 MMSA and state ratings. The Chicago MMSA AA and the state of Wisconsin carried the greatest weights in the overall conclusions. These two areas represented 82.1 percent of BHB's deposits, with 64.3 percent and 17.8 percent of deposits, respectively.

Examiners based the MMSA and state ratings on performance in all the bank's AAs and were not based solely on the performance in the full-scope AAs to the exclusion of performance in the limited-scope AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how examiners weighted the areas in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c), in determining a national bank's CRA rating, the OCC considered evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans the OCC considered as part of the bank's lending performance. As part of this evaluation process, the OCC consulted 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 CFPB, as applicable.

The OCC did not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC had considered information made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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 concerned activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Ratings

Chicago-Naperville-Elgin, IL-IN-WI (Chicago) MMSA

CRA rating for the Chicago MMSA¹: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution and overall borrower distribution of originated and purchased home mortgage loans, small loans to businesses, and small loans to farms were adequate.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.
- BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Institution's Operations in the Chicago MMSA

The Chicago MMSA AA was comprised of four Metropolitan Divisions (MDs). BHB delineated the entirety of the Chicago-Naperville-Evanston, IL MD and the Lake County-Kenosha County, IL-WI MD as AAs. BHB also delineated as AAs the portions of the Elgin, IL MD and the Gary, IN MD where BHB had branch locations. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, Federal Deposit Insurance Corporation (FDIC) summary of deposit information, BHB had almost \$85.7 billion in deposits in these AAs, which represented 64.3 percent of BHB's total deposits. During the evaluation period, BHB made \$5.5 billion, or 43 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs. This rating area was BHB's largest in terms of deposits held and dollar volume of loans originated or purchased.

BHB had 193 office locations and 620 ATMs, of which 341 were deposit-taking, within these AAs. BHB ranked second in deposit market share with 14.4 percent. Primary competitors included JPMorgan Chase Bank, N.A. with 304 branches and 23.5 percent market share, Bank of America, N.A. with 127 branches and 10.2 percent market share, and The Northern Trust Company with five branches and 6.5

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

percent market share. There were 151 additional FDIC-insured depository institutions with 1,627 offices within BHB's AAs.

The following tables provide a summary of the demographics, including housing and business information, for the Chicago MMSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago MMSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,182	14.2	23.7	29.2	31.8	1.0
Population by Geography	9,382,158	9.8	23.3	32.1	34.5	0.2
Housing Units by Geography	3,741,525	10.2	22.3	32.1	35.0	0.3
Owner-Occupied Units by Geography	2,194,473	4.5	17.6	35.5	42.3	0.1
Occupied Rental Units by Geography	1,199,360	17.3	29.5	27.5	25.1	0.6
Vacant Units by Geography	347,692	22.2	27.9	25.9	23.6	0.4
Businesses by Geography	824,188	6.1	16.6	29.4	47.5	0.4
Farms by Geography	13,057	3.7	15.1	38.7	42.3	0.1
Family Distribution by Income Level	2,238,726	23.4	16.4	18.7	41.5	0.0
Household Distribution by Income Level	3,393,833	25.3	15.3	17.0	42.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$237,596
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,037
Median Family Income MSA - 23844 Gary, IN		\$64,075	Families Below Poverty Level			10.6%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago MMSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,300	11.9	22.9	32.1	31.7	1.5
Population by Geography	9,471,334	8.9	22.3	34.6	33.7	0.6
Housing Units by Geography	3,795,034	9.4	22.0	34.4	33.7	0.6
Owner-Occupied Units by Geography	2,262,712	4.6	18.1	37.6	39.3	0.3
Occupied Rental Units by Geography	1,229,132	15.6	28.1	30.3	25.1	0.9
Vacant Units by Geography	303,190	19.7	26.1	27.4	25.8	0.9
Businesses by Geography	1,053,823	6.1	17.0	32.1	44.3	0.6
Farms by Geography	15,362	4.3	17.5	38.6	39.3	0.4
Family Distribution by Income Level	2,253,041	22.9	16.7	19.4	41.0	0.0

Table A – Demographic Information of the Assessment Area
Assessment Area: Chicago MMSA – 2022

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Household Distribution by Income Level	3,491,844	25.2	15.4	17.0	42.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$273,659
Median Family Income MSA - 20994 Elgin, IL		\$97,326	Median Gross Rent			\$1,216
Median Family Income MSA - 23844 Gary, IN		\$75,625	Families Below Poverty Level			8.1%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$105,876				
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent.						
* The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the Chicago MMSA AA was \$237,596 in 2020-2021 and was \$273,659 in 2022. In addition, the Federal Housing Finance Authority (FHFA) House Price Index (HPI) calculator indicated housing values in the MSA increased approximately 25.4 percent over the evaluation periods.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022) and lowest cost/highest cost MD, low-income families earned less than \$32,038/\$43,569 or \$37,633/\$52,938 and moderate-income families earned less than \$51,260/\$69,710 or \$60,261/\$84,701. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$801/1,089 or \$942/\$1,323 for low-income borrowers and \$1,282/\$1,743 or \$1,507/\$2,118 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$1,275/\$1,469. Many low-income borrowers would have had difficulty affording a mortgage loan in any of the MDs during both evaluation periods.

Data from Moody's Analytics over the evaluation periods indicated that the Chicago MMSA AA experienced job growth at a steady rate since the pandemic spike in unemployment in the spring of 2020. Robust growth in transportation/warehousing and leisure/hospitality offset sluggishness elsewhere, including office-using industries. Single-family house price appreciation gained momentum during the evaluation periods. The modest increase in single-family construction did not make up for a slowdown in multifamily building. The pace of total housing starts remained suppressed.

Based on data from the U.S. Bureau of Labor Statistics (BLS), the unemployment rate in the Chicago MMSA AA was 4 percent in January 2020, as high as 18.4 percent in April 2020, and 4.1 percent in December 2022. Major employers in the AA included: Advocate Health Care System; Northwestern Memorial Healthcare; Amita Health; University of Chicago; JPMorgan Chase & Co.; Amazon; United Continental Holdings Inc.; Walgreens Boots Alliance Inc.; Northwestern University; Presence Health; Walmart Inc.; Abbott Laboratories; Jewel-Osco Stores; University of Illinois; and American Airlines.

Examiners reviewed a local government consolidated plan and information from 13 community contact interviews conducted during the evaluation period; three from affordable housing organizations; two from economic development agencies; two from homeownership counseling agencies; two from

nonprofit real estate developers; and one each from a nonprofit small business lender, a Community Development Financial Institution (CDFI), a community services organization, and a housing authority. These sources identified the following needs within the community:

- Affordable housing, including financing for purchases or rehabilitation of one- to four-family homes
- Alternatives to pay day loans
- Financial education programs that assist consumers with building and maintaining savings, student loan counseling, debt management counseling, and second chance checking accounts
- First-time homebuyer workshops, and small business planning assistance
- Small business micro loans
- Service on the board of directors of nonprofit organization
- Financing and grant support for community land trusts to prevent gentrification

The Chicago MMSA AA offered abundant opportunities to meet the identified needs. There were numerous CD and social services organizations in the AA. Local governments had designated many areas for redevelopment and use a variety of resources to increase investments in those areas including tax increment financing (TIF) districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs. Examiners noted at least 34 certified CDFIs, 21 HUD-approved housing counseling agencies, and 12 SBA Small Business Development centers serving the AA.

Scope of Evaluation in the Chicago MMSA AA

For purposes of this evaluation, examiners combined BHB's four delineated AAs into one and aggregated the data at the MMSA level for purposes of analysis and presentation. This AA received a full-scope review.

Examiners placed more emphasis on small loans to businesses versus home mortgage loans and small loans to farms in arriving at the overall conclusion. Small loans to businesses represented the majority of BHB's lending in this AA. Small loans to farms received the least weighting as farm lending was not a primary focus for BHB.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO MMSA AA

LENDING TEST

BHB's performance under the Lending Test in the Chicago MMSA AA is rated High Satisfactory.

Based on a full-scope review, BHB's performance in the Chicago MMSA AA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Chicago	14,062	31,361	115	335	45,873
Total	14,062	31,361	115	335	45,873

Dollar Volume of Loans (\$000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Chicago	2,789,285	2,701,779	4,738	1,316,371	6,812,173
Total	2,789,285	2,701,779	4,738	1,316,371	6,812,173

BHB ranked second out of 155 depository institutions (top 2 percent) with a deposit market share of 14.4 percent.

For home mortgage loans, BHB's market share of 1 percent ranked 26th out of 1,013 lenders (top 3 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 8.4 percent market share, Guaranteed Rate, Inc. with 6.5 percent market share, and Rocket Mortgage with 4.6 percent market share. Of the top 15 home mortgage lenders, 10 were non-depository financial institutions (NDFIs) and five were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 3.3 percent ranked ninth out of 342 lenders (top 3 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 20.6 percent market share, American Express National Bank with 13.9 percent market share, and Cross River with 9.6 percent market share. The top eight small business lenders were institutions with large business credit card portfolios with average loan sizes of \$26,000 or less. BHB's average small business loan size was \$74,000.

For small loans to farms, BHB's market share of 4.9 percent ranked sixth out of 50 lenders (top 12 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 20.3 percent market share, First Midwest Bank with 14.9 percent market share, and John Deere Financial, Federal Savings Bank (FSB) with 11.4 percent market share.

Distribution of Loans by Income Level of the Geography

BHB exhibited an adequate geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was poor. Examiners considered the impact of heavy competition among home mortgage lenders and low inventory of purchasable homes in low- and moderate-income geographies.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was adequate.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies was well below the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was well below, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders. Included in this analysis were 2,416 PPP loans totaling \$167.5 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Small Loans to Farms

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

The geographic distribution of small loans to farms was adequate. Examiners considered that small farm lending was not a primary focus for BHB.

For 2020 through 2021, the percentage of small loans to farms originated or purchased in both low- and moderate-income geographies was significantly below the percentage of farms located in those geographies. The percentage of small loans to farms originated or purchased in low-income geographies exceeded, and in moderate-income geographies approximated, the aggregate percentage of all reporting lenders. Included in this analysis were three PPP loans that totaled \$30,000 to small farms located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB did not originate or purchase enough small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes and the significant increase in home values during the evaluation period, which limited the affordability for many low-income borrowers.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans to low-income geographies was below the percentage of owner-occupied housing units in those geographies.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and below the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 48.2 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 12,328 out of 15,991 PPP loans, totaling approximately \$28.3 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Farms

Refer to Table T in the Chicago MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was adequate. Examiners considered that small farm lending was not a primary focus for BHB.

For 2020 through 2021, the percentage of loans to small farms originated or purchased was well below both the percentage of small farms in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 55.6 percent of its small loans to farms, including PPP loans. Examiners considered the fact that BHB originated 52 out of 78 PPP loans, totaling approximately \$1.2 million, to farms with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB did not originate or purchase enough small loans to farms to conduct a meaningful analysis.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 335 CD loans totaling over \$1.3 billion, which represented 13.9 percent of allocated tier 1 capital. BHB utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 42.6 percent of these loans funded revitalization and stabilization efforts, 39.3 percent funded affordable housing that provided over 3,800 units, 10.5 percent funded community services, and 7.6 percent funded economic development activities. This included 209 PPP loans totaling \$531.2 million within the AA that qualified as CD.

Examples of CD loans in the AA include:

- A \$63.1 million loan for the construction of a new facility and new equipment lines for a small business. The new facility will be in a moderate-income geography and initially created 20 new jobs with the potential to employ up to 150 employees from the local community once fully operational.
- A total of \$20.9 million in loans to a Federally Qualified Health Center (FQHC) that received most of its revenues from Medicaid. The funds supported working capital, development of a new healthcare facility, and refinancing of four hospital locations. The new healthcare facility was in a moderate-income geography. This FQHC served over 75,000 patients annually throughout its clinics located within the Chicago MMSA AA.
- A \$2 million line of credit to support working capital needs for a social service agency that provided comprehensive assistance and wellness programming to low-income individual and families.

Services provided included day care, after school programs, violence prevention and intervention, interim housing, home care for older adults, and a wellness center.

- A \$1.3 million non-revolving line of credit to finance the purchase of new equipment, furniture, and fixtures for a start-up small business located in a moderate-income geography. The new business created 31 full-time jobs and nine part-time jobs. The small business also received a \$250,000 grant from the City of Chicago's Neighborhood Opportunity Fund, which awards grants to projects that have a catalytic impact on the neighborhood and lead to the construction or rehabilitation of new and existing, publicly accessible commercial spaces.

Product Innovation and Flexibility

BHB made extensive use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 2,725 loans totaling \$80.3 million among the various flexible lending products available in the Chicago MMSA AA. This included 74 Home Possible loan totaling \$11.1 million, 119 HFA loans totaling \$19.8 million, 42 FHA loans totaling \$9.9 million, eight NHLP loans totaling \$1.7 million, 1,155 Credit Builder loans totaling \$1.5 million, and 1,327 Special Purpose Credit Program loans totaling \$30.8 million. In addition, BHB facilitated the use of 161 DPA grant of \$805,000 and 60 BHB grants totaling \$180,000.

INVESTMENT TEST

BHB's performance under the Investment Test in the Chicago MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Chicago MMSA AA was excellent.

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)
Full-Scope:										
Chicago	208	452,810	763	537,469	971	100.0	990,279	100.0	91	289,335
Total	208	452,810	763	537,469	971	100.0	990,279	100.0	91	289,335
<small>*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.</small>										

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 10.5 percent of tier 1 capital allocated to the AA. This did not include 91 unfunded commitments totaling \$289.3 million, an additional 3.1 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB made significant use of innovative and/or complex investments to support CD initiatives. BHB had 147 qualified investments and grants totaling \$627.2 million related to affordable housing, 96 totaling \$191.4 million related to economic development, 683 totaling \$134.7 million to community service

organizations that provided needed services to low- and moderate-income individuals, and 45 totaling \$37.4 million for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- A \$27.5 million investment in a multi-investor low-income housing tax credit (LIHTC) fund that acquires equity interests in affordable housing projects expected to qualify for federal LIHTCs as well as other federal tax benefits. The investment was allocated for two properties: one with two sites consisting of 37 units located in a low-income geography and 14 units located in a moderate-income geography, and a second property, which was a 55-unit new construction senior housing project, located in a moderate-income geography. Affordable housing was one of the greatest needs in the Chicago MMSA AA.
- Three \$10 million investments in licensed Small Business Investment Company (SBIC) equity funds that invest in the Chicago MMSA AA. These funds make subordinated debt and minority equity co-investments in lower middle-market companies that fit the SBA's definition of a small business.
- A \$10 million investment with a not-for-profit lender, real estate consultant, and CDFI with a focus on lending for community support services and community facilities projects ranging from affordable housing to schools, community centers, and physical structures required to meet community needs such as health care and childcare centers.

SERVICE TEST

BHB's performance under the Service Test in the Chicago MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Chicago MMSA AA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
Chicago	100.0	193	100.0	3.6	18.1	32.1	45.6	0.5	8.9	22.3	34.6	33.7	0.6
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in low-income geographies was well below, and in moderate-income geographies was near-to, the percentage of the population living within those geographies. Examiners further considered 40 middle- or upper-income branches, 16 that were "across the street" from a low- or moderate-income geography and 24 that data indicated served a significant number of customers from

low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 620 ATMs in the AA, of which 341 were deposit-taking. BHB provided data that indicated 59.8 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 26.9 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
Chicago	3	24	0	-4	-7	-10	0
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, BHB's opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB opened three branches, one in a low-income geography and none in moderate-income geographies. BHB closed 24 branches, one in a low-income geography and four in moderate-income geographies. BHB closed the branch located in a low-income geography due to safety and building issues. They opened a new branch in a low-income geography approximately one mile north of the prior location to continue serving the community. In addition, the drive-thru facility at a closed branch located in a moderate-income geography remained in place. Even after the closures, BHB maintained the second largest number of branches in the AA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Friday, and 176 branches were open from 9:00 a.m. to noon on Saturdays. Of the 17 branches not open on Saturday, one was in a low-income geography and three were in moderate-income geographies. There were 156 locations with drive-thru facilities, operating under similar hours.

BHB opened 25,888 SMART Money checking accounts and 1,155 Credit Builder accounts in the Chicago MMSA AA during the evaluation period.

Community Development Services

The institution was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, 90 bank employees conducted 353 financial education events totaling 1,394 hours in coordination with 92 different organizations. Over 7,030 participants attended these classes. These events included financial literacy and wellness for both adults and students, first-time homebuyer education and down payment assistance programs, foreclosure prevention, housing seminars primarily targeted to low- and moderate-income individuals and families, and entrepreneurial classes for small business owners. Leadership was evident by 81 bank employees

spending over 4,378 hours serving on boards and committees for 79 different CD organizations. Additionally, 37 employees provided 650 hours of technical expertise by providing tax preparation and legal assistance to low- and moderate-income individuals and families and 132 employees provided over 2,170 hours of general qualified volunteer activities.

Examples of CD services in the AA include:

- A senior level bank employee was a board member of an anti-poverty, hunger relief non-profit organization whose mission was to provide healthy food and impactful programs to promote self-sufficiency. The organization restricted its food programs to individuals earning less than 185 percent of the Federal Poverty Guidelines. Programs provided low-income families the support to meet immediate needs and education to achieve long-term independence.
- One senior level employee served as board president, was a committee member, and contributed to fund raising, while another bank employee served on the advisory board for the local chapter of a nationwide non-profit housing organization. The organization's mission was to build strength, stability, and self-reliance in partnership with families in need of decent and affordable housing. The organization invested in neighborhood and housing improvements through affordable homeownership education, neighborhood grants, home care education, community action and homeowner support. BHB also made grants totaling \$250,000 to this organization during the review period.
- One senior level bank employee sat on the board, and another was a member of the multifamily loan committee of a certified CDFI headquartered in the AA. The CDFI originated construction and permanent loans for multi-family rental properties in low- and moderate-income communities in the city and sold the pooled notes to investors. Its mission was to be a leading force in affordable housing and neighborhood revitalization through innovative financing programs and policy leadership. During the review period, BHB also made \$33 million in allocated investments to the CDFI.

Kansas City, MO-KS (Kansas City) MMSA

CRA rating for the Kansas City MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution of originated and purchased home mortgage loans and small loans to businesses was good and overall borrower distribution was adequate.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test Rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the Kansas City MMSA

BHB delineated five of the 14 counties included in the Kansas City MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just over \$1.2 billion in deposits in this AA, which represented 0.9 percent of BHB's total deposits. During the evaluation period, BHB made \$219.7 million or 1.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 10 office locations and 13 ATMs, all of which were deposit-taking, within the AA. BHB ranked 13th in deposit market share with 1.6 percent. The top four competitors had 54.1 percent of the market. These competitors included UMB Bank, N.A. with 29 branches and 28.1 percent market share, Commerce Bank with 39 branches and 12 percent market share, Bank of America, N.A. with 31 branches and 7.9 percent market share, and U.S. Bank, N.A. with 39 branches and 6.1 percent market share. There were 87 additional FDIC-insured depository institutions with 397 offices within BHB's AA.

The following tables provide a summary of the demographics, including housing and business information, for the Kansas City MMSA AA for each evaluation period.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Kansas City MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	463	16.8	22.2	29.2	27.6	4.1
Population by Geography	1,732,280	10.4	21.8	33.8	33.7	0.3
Housing Units by Geography	746,566	12.2	22.9	34.4	30.0	0.5
Owner-Occupied Units by Geography	435,668	6.6	18.0	35.5	39.7	0.2
Occupied Rental Units by Geography	242,654	17.6	30.2	34.4	17.1	0.7
Vacant Units by Geography	68,244	28.7	28.5	27.1	13.7	2.0
Businesses by Geography	159,373	7.7	18.6	31.7	40.0	2.0
Farms by Geography	3,975	5.9	17.0	35.2	41.5	0.4
Family Distribution by Income Level	433,865	21.4	17.2	20.0	41.4	0.0
Household Distribution by Income Level	678,322	23.7	16.7	17.4	42.2	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$164,056
			Median Gross Rent			\$858
			Families Below Poverty Level			9.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Kansas City MMSA - 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	527	10.6	25.0	32.6	27.1	4.6
Population by Geography	1,856,365	7.8	24.4	35.0	32.1	0.7
Housing Units by Geography	779,890	8.7	25.9	35.4	29.0	0.9
Owner-Occupied Units by Geography	457,130	4.9	20.5	37.4	36.7	0.4
Occupied Rental Units by Geography	260,833	13.3	32.8	34.1	18.3	1.5
Vacant Units by Geography	61,927	17.5	36.8	26.0	17.3	2.4
Businesses by Geography	230,359	6.3	21.4	33.2	36.2	3.0
Farms by Geography	5,495	4.6	20.0	38.0	36.3	1.1
Family Distribution by Income Level	453,426	20.3	17.3	21.4	41.1	0.0
Household Distribution by Income Level	717,963	23.8	16.3	17.9	42.0	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$86,562	Median Housing Value			\$205,278
			Median Gross Rent			\$1,008
			Families Below Poverty Level			6.9%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the Kansas City MMSA AA was \$164,056 in 2020-2021 and \$205,278 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 36.5 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2020), low-income families earned less than \$36,312 or \$43,281 and moderate-income families earned less than \$58,098 or \$69,250. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$908 or \$1,082 for low-income borrowers and \$1,452 or \$1,731 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$881 or \$1,102. Many low-income borrowers would have had difficulty affording a mortgage loan in the Kansas City MMSA AA.

Data from Moody's Analytics over the evaluation period indicated that the Kansas City MMSA AA had recovered since the pandemic, but that job growth was beginning to slow in 2022 given the job losses incurred by the financial industry in the area. Population gains in the area increased housing demand, which raised home prices. Utilization of office spaces has decreased since the pandemic as more employees are working from home and will impact other businesses in the areas that once served these workers.

Based on data from the BLS, the unemployment rate in the Kansas City MMSA AA was 3.4 percent in January 2020, was as high as 12 percent in April 2020, and was 2.3 percent in December 2022. Major employers in the AA included: Children's Mercy Hospital; Cerner Corp.; Honeywell; Saint Luke's Health System; Truman Medical Centers; SS&C; Burns & McDonnell; Research Medical Center; University of Missouri-Kansas; Commerce Bank; and Hallmark Cards Inc.

Examiners reviewed area community action plans and three community contact interviews conducted during the evaluation period: two from affordable housing agencies and one from a community resource organization. These sources identified the following needs within the community:

- Affordable housing, both owner-occupied and rental properties
- Investment in disadvantaged areas to support business development
- Improvements in public transportation for residents to access jobs in employment hubs
- Effective training programs for high growth occupations

The Kansas City MMSA AA offered adequate opportunities for financial institutions to meet the identified needs. There were a variety of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted seven certified CDFIs, four HUD-approved housing counseling agencies, and two SBA Small Business Development centers serving the AA.

Scope of Evaluation in the Kansas City MMSA

Examiners conducted a full-scope review of the Kansas City MMSA AA. Examiners emphasized small loans to businesses versus home mortgage lending in arriving at the overall conclusions. Small loans to businesses represented the majority of BHB's lending in this AA. BHB did not originate or purchase a sufficient volume of small loans to farms to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY MMSA

LENDING TEST

BHB's performance under the Lending Test in the Kansas City MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Kansas City MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Kansas City	456	1,261	5	16	1,738
Total	456	1,261	5	16	1,738

Dollar Volume of Loans (\$000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Kansas City	101,365	117,999	412	136,732	356,508
Total	101,365	117,999	412	136,732	356,508

BHB ranked 13th out of 92 depository institutions (top 15 percent) with a deposit market share of 1.6 percent.

For home mortgage loans, BHB's market share of 0.2 percent ranked 91st out of 673 lenders (top 14 percent). The top three lenders were Community America Credit Union with 6.1 percent market share, Rocket Mortgage with 5.1 percent market share, and Wells Fargo Bank, N.A. with 4.9 percent market share. Of the top 15 home mortgage lenders in this AA, nine were NDFIs, one was a credit union, and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 0.9 percent ranked 24th out of 198 lenders (top 13 percent). The top three lenders were American Express National Bank with 15.2 percent market share, JPMorgan Chase Bank, N.A. with 11.6 percent market share, and U.S. Bank, N.A. with 10.3 percent market share. Of the top 10 small business lenders in this AA, seven were institutions with large business credit card portfolios with average loan sizes of \$24,000 or less. BHB's average small business loan size was \$76,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans originated or purchased in low-income geographies was near-to the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively. Included in this analysis were 106 PPP loans totaling \$9.7 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was stronger than with the 2020 through 2021 performance. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA and significant increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers approximated, and to moderate-income borrowers exceeded, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate. BMOTF finance accounted for most small business loans within the Kansas City MMSA AA.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 55.3 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 402 out of 532 PPP loans, totaling approximately \$31.5 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 16 CD loans totaling over \$136.7 million, which represented 101.1 percent of allocated tier 1 capital. BHB utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs of affordable housing. By dollar volume, 70.4 percent of these loans funded affordable housing that provided 823 units, 26.5 percent funded revitalization and stabilization efforts, and 3.1 percent funded community services. This included 10 PPP loans totaling \$36.2 million that qualified as CD within the AA.

Examples of CD loans in the AA include:

- A \$10.5 million loan to finance the construction of a new multifamily housing complex. The project consisted of 62 affordable housing units, with 27 units allocated for Housing Assistance Payment (HAP) contracts and 15 LIHTC units restricted to persons earning 60 percent or less of the area median income. The remaining 20 units had rents below the Federal Financial Institutions Examination Council (FFIEC) affordable limit for the AA. This loan was part of a complex financing package consisting of multiple sources, including a \$6.5 million LIHTC investment by BHB.
- A \$7.6 million loan to finance the construction of a new multifamily housing complex. The project consisted of 49 units, 44 of which had rents below the FFIEC affordable limit for the AA. This loan was part of a complex financing package consisting of multiple sources.

Product Innovation and Flexibility

BHB used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 117 loans totaling \$1.8 million among the various flexible lending products available in the Kansas City MMSA AA. This included five Home Possible loans totaling \$778,820, one FHA loan totaling \$174,245, 60 Credit Builder loans totaling \$74,250, and 51 Special Purpose Credit Program loans totaling \$778,000. In addition, BHB facilitated the use of three DPA grants totaling \$15,000 and one BHB Grant of \$3,000.

INVESTMENT TEST

BHB's performance under the Investment Test in the Kansas City MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Kansas City MMSA AA was excellent.

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)
Full-Scope:										
Kansas City	13	\$9,466	29	\$7,436	42	100	\$16,902	100	16	\$5,774
Total	13	\$9,466	29	\$7,436	42	100	\$16,902	100	16	\$5,774
*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.										

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 12.5 percent of tier 1 capital allocated to the AA. This did not include 16 unfunded commitments totaling \$5.7 million, an additional 4.3 percent of allocated capital.

BHB exhibited good responsiveness to community credit and economic development needs. BHB occasionally used innovative and/or complex investments to support CD initiatives. BHB had six qualified investments and grants totaling \$8.5 million related to affordable housing, two totaling \$6.6 million related to economic development, 30 totaling \$1.6 million to community service organizations that provided needed services to low- and moderate-income individuals, and four totaling \$320,787 for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- Over \$12 million in current- and prior-period investments in a CDFI that provided loans, consulting, and development support to mission-driven nonprofits. The organization's mission was to ensure all people in all communities, including low- and moderate-income individuals and families, had equitable access to healthcare, childcare, housing, education, and other fundamental necessities.
- The renewal of a \$3 million investment and three grants totaling \$30,000 to the local chapter of a nationwide CDFI. The CDFI offered loans and lines of credit to organizations in the bank's AA that provided services to low- and moderate-income individuals or geographies. Services included financial education programs, revitalization initiatives, affordable housing creation or refurbishment, and grants to small businesses within the AA.

SERVICE TEST

BHB's performance under the Service Test in Kansas City MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Kansas City MMSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
Kansas City	100.0	10	100.0	0.0	20.0	20.0	50.0	10.0	7.8	24.4	35.0	32.1	0.7
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in moderate-income geographies was near-to the percentage of the population living within those geographies. BHB did not have any branches in low-income geographies. Examiners further considered five middle- or upper-income branches, one that was "across the street" from a low-income geography and four that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 13 ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 60.1 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 36.9 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
Kansas City	0	0	0	0	0	0	0
*The NA category consists of geographies that have not been assigned an income classification.							

BHB did not open or close any branches in the Kansas City MMSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches had the same lobby hours and drive-thru hours of 9:00 a.m. to 5:00 pm, Monday through Friday. Six branches were open Saturdays from 9:00 a.m. to noon.

BHB opened 264 SMART Money checking accounts and 60 Credit Builder accounts in the Kansas City MMSA AA during the evaluation period.

Community Development Services

BHB provided a significant level of CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, three bank employees conducted five financial education events totaling 98 hours in coordination with two different organizations. Approximately 75 participants attended these classes. These events included first-time homebuyer education, basic banking, budgeting, and financial literacy, which included debt management, credit scores and credit reporting. Leadership was evident by three bank employees spending 206 hours on boards and committees for three different CD organizations. Additionally two employees provided 18 hours of general qualified volunteer activities.

Examples of CD services in the AA include:

- A bank employee provided 81 hours serving on the board of a local chapter of a nationwide community development corporation (CDC). The organization's mission included providing

affordable housing and economic development assistance to low- and moderate-income communities.

- A bank employee provided 69 hours serving as board chairman for an organization that provided responsive care for children from low- and moderate-income families. Programs included occupational therapy, nutrition assessment, psychological evaluations, play therapy, socialization, and counseling.

Minneapolis-St. Paul-Bloomington, MN-WI (Minneapolis) MMSA

CRA rating for the Minneapolis MMSA³: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution of originated and purchased home mortgage loans and small loans to businesses was good and overall borrower distribution was adequate.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.
- BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Institution's Operations in the Minneapolis MMSA

BHB delineated nine of the 15 counties included in the Minneapolis MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just under \$8.3 billion in deposits in this AA, which represented 6.2 percent of BHB's total deposits. During the evaluation period, BHB made \$633.9 million or 5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 23 office locations and 27 ATMs, of which 23 were deposit-taking, within this AA. BHB ranked fourth in deposit market share with 3.7 percent. The top three competitors had 70.6 percent of the market. These competitors included U.S. Bank, N.A. with 80 branches and 38.7 percent deposit market share, Wells Fargo Bank, N.A. with 86 branches and 25 percent market share, and Ameriprise Bank, FSB with two branches and 6.9 percent market share. There were 113 additional FDIC-insured depository institutions with 470 offices within BHB's AA.

The following tables provide a summary of the demographics, including housing and business information, for the Minneapolis MMSA AA for each evaluation period.

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Minneapolis MMSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	726	7.4	22.2	42.3	27.1	1.0
Population by Geography	3,079,031	6.2	19.6	43.2	30.6	0.3
Housing Units by Geography	1,257,426	5.8	20.4	44.4	29.1	0.3
Owner-Occupied Units by Geography	821,404	2.3	15.5	46.5	35.6	0.1
Occupied Rental Units by Geography	376,386	12.9	30.4	39.8	16.0	0.9
Vacant Units by Geography	59,636	9.7	23.6	42.9	22.9	0.8
Businesses by Geography	336,846	5.2	17.5	42.7	34.2	0.3
Farms by Geography	7,731	2.0	12.8	50.6	34.5	0.1
Family Distribution by Income Level	764,950	20.3	17.1	21.8	40.7	0.0
Household Distribution by Income Level	1,197,790	23.8	16.1	18.3	41.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	\$84,589		Median Housing Value			\$231,190
			Median Gross Rent			\$962
			Families Below Poverty Level			7.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Minneapolis MMSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	810	6.0	21.9	42.2	28.5	1.4
Population by Geography	3,298,852	5.5	20.6	43.3	29.8	0.9
Housing Units by Geography	1,305,571	5.2	20.9	44.1	29.1	0.7
Owner-Occupied Units by Geography	864,118	2.5	17.0	46.9	33.6	0.1
Occupied Rental Units by Geography	387,177	10.9	29.5	38.4	19.2	1.9
Vacant Units by Geography	54,276	8.0	22.4	39.6	28.9	1.1
Businesses by Geography	394,310	4.3	18.3	41.1	35.5	0.8
Farms by Geography	8,570	1.8	15.9	47.9	34.2	0.2
Family Distribution by Income Level	789,454	19.6	17.9	22.5	40.0	0.0
Household Distribution by Income Level	1,251,295	23.1	16.8	18.9	41.2	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$103,977	Median Housing Value			\$289,960
			Median Gross Rent			\$1,162
			Families Below Poverty Level			5.2%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the Minneapolis MMSA AA was \$231,190 in 2020-2021 and was \$289,960 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 23.7 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$42,295 or \$51,989 and moderate-income families earned less than \$67,691 or \$83,182. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,057 or \$1,300 for low-income borrowers and \$1,692 or \$2,080 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$1,241 or \$1,557. Many low-income borrowers would have had difficulty affording a mortgage loan in the Minneapolis MMSA AA during both evaluation periods.

Data from Moody's Analytics over the evaluation period indicated that job growth in the Minneapolis MMSA AA was underperforming regional peers, recouping only 80 percent of jobs lost during the pandemic. Labor demand remained near peak levels. Despite its slow job recovery, house price growth remained in the double digits.

Based on data from the BLS, the unemployment rate in the Minneapolis MMSA AA was 3.3 percent in January 2020, as high as 11.7 percent in May 2022, and 2.8 percent in December 2022. Major employers in the AA included: Fairview Health System; Allina Health System; Target Corp.; University of Minnesota; HealthPartners; Wells Fargo & Co.; UnitedHealth Group; 3M Co.; U.S. Bancorp; Medtronic; Inc.; SUPERVALU, Inc.; and Delta Airlines.

Examiners reviewed information from seven community contact interviews conducted during the evaluation period: four from economic development agencies and one each from an affordable housing organization, a farm service agency, and an area chamber of commerce. These sources identified the following needs within the community:

- Affordable housing, both single and multifamily units
- Affordable mortgage loans for low- and moderate-income borrowers and small business loans
- Low-cost rehabilitation loans for small businesses
- Short-term loans for farmers

The Minneapolis MMSA AA offered abundant opportunities for banks to meet the identified needs of the community. There were a variety of CD and social service organizations. Examiners noted at least 19 certified CDFIs, 15 HUD-approved housing counseling agencies, and four SBA Small Business Development centers serving the AA.

Scope of Evaluation in the Minneapolis MMSA

Examiners conducted a full-scope review of the Minneapolis MMSA AA. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion. Small loans to businesses represented the majority of BHB's lending in this AA. BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MINNEAPOLIS MMSA

LENDING TEST

BHB's performance under the Lending Test in the Minneapolis MMSA AA is rated High Satisfactory.

Based on a full-scope review, BHB's performance in the Minneapolis MMSA AA was good.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Minneapolis	1,415	2,429	15	117	3,976
Total	1,415	2,429	15	117	3,976

Dollar Volume of Loans (\$000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
Minneapolis	388,032	245,295	571	635,069	1,268,967
Total	388,032	245,295	571	635,069	1,268,967

BHB ranked fourth out of 117 depository institutions (top 4 percent) with a deposit market share of 3.7 percent.

For home mortgage loans, BHB's market share of 0.2 percent ranked 69th out of 716 lenders (top 10 percent). The top three lenders were U.S. Bank, N.A. with 8.4 percent market share, Wells Fargo Bank, N.A. with 6 percent market share, and Bell Bank with 5.1 percent market share. Of the top 15 home mortgage lenders, nine were NDFIs, two were credit unions, and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 1 percent ranked 16th out of 218 lenders (top eight percent). The top three lenders were U.S. Bank, N.A. with 19.1 percent market share, American Express National Bank with 16.8 percent market share, and Wells Fargo Bank, N.A. with 16.1 percent market share. Of the top 12 small business lenders, 10 were institutions with large business credit card portfolios with average loan sizes of \$28,000 or less. BHB's average small business loan size was \$77,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders and low inventory of purchasable homes in low- and moderate-income geographies.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than with the 2020 through 2021 performance. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was below the percentage of owner-occupied units in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies approximated, both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively. Included in this analysis were 309 PPP loans totaling \$38.1 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes and the significant increase in home values during the evaluation period, which limited the affordability for many low-income borrowers.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was near-to, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 59 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 1,142 out of 1,446 PPP loans, totaling approximately \$115.8 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 117 CD loans totaling over \$635.1 million, which represented 69.4 percent of allocated tier 1 capital. BHB utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 50 percent of these loans funded revitalization and stabilization efforts, 48 percent funded affordable housing that provided 1,180 units, 1.9 percent funded economic development activities, and

0.1 percent funded community service organizations. This included 93 PPP loans totaling \$272.3 million within the AA that qualified as CD.

Examples of CD loans in the AA include:

- A \$39.1 million loan to finance the development of a multifamily affordable housing complex within a moderate-income geography. The project contained 172 units with 163 units having rents under the FFIEC affordable limit with 17 of them receiving a subsidy from a state funded program that pays rents for disabled senior adults. This loan was part of a complex financing package consisting of multiple sources.
- A \$15 million renewed line of credit to finance capital projects for a nonprofit utility company that provided essential infrastructure to the community. The organization provided energy and water utility services to an area that was comprised mostly of low- and moderate-income geographies.
- A \$100,000 line of credit to a community service nonprofit organization whose mission was to build wealth in African immigrant communities that consists of predominantly low-and moderate-income individuals and families. They provided entrepreneurship support, small business development, micro-lending, homeownership education, and community development initiatives.

Product Innovation and Flexibility

BHB used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 454 loans totaling \$4.7 million among the various flexible lending products available in the Minneapolis MMSA AA. This included one HFA loan totaling \$144,000, 10 Home Possible loans totaling \$1.9 million, 336 Credit Builder loans totaling \$571,950, and 107 Special Purpose Credit Program loans totaling \$2.1 million. In addition, BHB facilitated the use of eight DPAs totaling \$40,000 and provided four BHB grants totaling \$12,000.

INVESTMENT TEST

BHB's performance under the Investment Test in the Minneapolis MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Minneapolis MMSA AA was excellent.

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)
Full-Scope:										
Minneapolis	21	32,430	73	38,172	94	88.7	70,603	95.2	18	29,664
Statewide/Regional										
Broader Minnesota	8	2,177	4	1,407	12	11.3	3,584	4.8	2	634
Total	29	34,607	77	39,579	106	100.0	74,187	100.0	20	30,298
<small>*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.</small>										

Minneapolis

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 7.7 percent of tier 1 capital allocated to the AA. This did not include 18 unfunded commitments totaling \$29.7 million, an additional 3.2 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB made significant use of innovative and/or complex investments in LIHTC funds, SBICs, and CDFIs to support CD initiatives. BHB had 23 qualified investments and grants totaling \$38.8 million related to affordable housing, 29 totaling \$30.4 million related to economic development, five totaling \$795,957 for revitalization and stabilization efforts, and 37 totaling \$609,583 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A \$15.3 million allocation from a larger LIHTC investment to finance the development of an affordable housing complex in a moderate-income geography. The project contained 172 units, 163 of which had rents under the FFIEC affordability limit for the MMSA. This investment was part of a complex financing package consisting of multiple sources.
- A \$2.5 million investment in a SBIC fund targeting small businesses that focus on healthcare, business services, education, and specialty manufacturing. The investment was allocated to a small business located in a moderate-income geography that specializes in medical device manufacturing.
- A \$1 million equity investment to a CDFI headquartered in the Minneapolis MMSA AA. The CDFI's mission was to improve the lives of disadvantaged low- and moderate-income people and strengthen distressed communities through innovative finance. Through its programs and products, the CDFI provided financing and technical assistance to small businesses, community facilities, and affordable housing. The investment supported the origination of community development and small business loans in the MMSA.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AA. BHB had 12 investments totaling \$3.6 million that benefited the broader statewide or regional area. BHB made six investments related to revitalization and stabilization efforts in low- or moderate-income geographies, four investments related to community services to low- and moderate-income individuals, and two investments related to economic development. These investments supported the overall Investment Test conclusion for the Minneapolis MMSA AA.

SERVICE TEST

BHB's performance under the Service Test in Minneapolis MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the Minneapolis MMSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
Minneapolis	100	23	100	4.4	8.7	39.1	47.8	0.0	5.5	20.6	43.3	29.8	0.9
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in low-income geographies was near-to, and in moderate-income geographies was well below, the percentage of the population living within those geographies. Examiners further considered seven middle- or upper-income branches, five that were "across the street" from a low- or moderate-income geography and two that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 27 ATMs in the AA, of which 23 were deposit-taking. BHB provided data that indicated 58.8 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. While this was a 2.4 percent decrease from fourth quarter 2019, these systems continue to provide additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
Minneapolis	0	3	0	0	-2	-1	0
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, BHB's opening and closing of branches had not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB did not open any branches in low- or moderate-income geographies. BHB closed one full-service branch and two limited-service branches in the AA all located in middle- or upper-income geographies. The branch closures resulted from BHB reassessing its delivery services due to changes in usage.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All but one branch has the same lobby hours and drive-thru hours, 9:00 a.m. to 5:00

p.m. Monday through Friday and 9:00 a.m. to noon on Saturdays. One branch located in an upper-income geography does not have Saturday hours or a drive-thru.

BHB opened 1,592 SMART Money checking accounts and 336 Credit Builder accounts in the Minneapolis AA during the evaluation period.

Community Development Services

BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, 34 bank employees conducted 78 financial education events totaling over 178 hours in coordination with 17 different organizations. Approximately 570 participants attended these classes. These events included financial literacy, financial wellness, and first-time homebuyers' programs for low- and moderate-income individuals. BHB employees also participated in an E-mentor program, an eight week online mentoring program pairing mentors in a professional field with low- and moderate-income high school students. Leadership was evident by 11 bank employees spending 451 hours participating on boards and committees for 10 different CD organizations. Additionally, 24 employees provided over 145 hours of general qualified volunteer activities.

Examples of CD Services in the AA include:

- A bank employee provided over 175 hours serving as board vice-president and as a member of the executive committee of a human service nonprofit. The organization provided low- and moderate-income individuals and families with basic needs for food, shelter, and clothing, while also connecting them to affordable housing, quality childcare, and employment opportunities.
- A bank employee provided over 60 hours serving as board treasurer for a CDFI that provided integrated business services to entrepreneurs in the AA, including business training, workshops, professional services, business lending, and business incubators.

St. Louis, MO-IL (St. Louis) MMSA

CRA rating for the St. Louis MMSA⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution and overall borrower distribution of originated and purchased home mortgage loans and small loans to businesses were good.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the St. Louis MMSA

BHB delineated five of the 16 counties included in the St. Louis MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just over \$1.8 billion in deposits in this AA, which represented 1.4 percent of BHB's total deposits. During the evaluation period, BHB made \$233.3 million or 1.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 14 office locations and 18 ATMs, all of which were deposit-taking, within the AA. BHB ranked 13th in deposit market share with 1.6 percent. The top four competitors had 56.3 percent of the market. These competitors included Stifel Bank & Trust with two branches and 17.8 percent market share, Bank of America, N.A. with 36 branches and 17.4 percent market share, U.S. Bank, N.A. with 66 branches and 13 percent market share, and Commerce Bank with 42 branches and 8.1 percent market share. There were 75 additional FDIC-insured depository institutions with 434 offices within BHB's AA.

The following tables provide a summary of the demographics, including housing and business information, for the St. Louis MMSA AA for each evaluation period.

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: St Louis MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	486	15.2	20.4	31.5	32.1	0.8
Population by Geography	2,182,588	10.4	19.0	34.8	35.5	0.3
Housing Units by Geography	965,904	11.9	20.2	34.8	32.8	0.3
Owner-Occupied Units by Geography	587,619	5.8	16.8	36.9	40.4	0.1
Occupied Rental Units by Geography	276,990	18.9	25.5	33.2	21.7	0.7
Vacant Units by Geography	101,295	28.5	25.5	26.5	19.1	0.3
Businesses by Geography	186,709	7.4	18.2	31.4	42.0	1.0
Farms by Geography	4,395	3.8	15.2	39.6	40.8	0.5
Family Distribution by Income Level	554,289	21.7	16.8	19.4	42.2	0.0
Household Distribution by Income Level	864,609	24.1	15.9	17.1	42.9	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$171,176
			Median Gross Rent			\$847
			Families Below Poverty Level			9.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: St Louis MMSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	542	12.7	19.7	34.9	31.5	1.1
Population by Geography	2,195,104	7.7	17.5	38.3	36.2	0.3
Housing Units by Geography	987,090	10.4	19.4	37.4	32.2	0.5
Owner-Occupied Units by Geography	601,461	5.1	15.2	39.3	40.1	0.2
Occupied Rental Units by Geography	290,844	17.1	24.7	36.4	20.9	0.9
Vacant Units by Geography	94,785	24.0	29.9	28.2	16.6	1.3
Businesses by Geography	347,295	7.6	14.5	32.9	44.2	0.8
Farms by Geography	7,133	5.6	14.2	37.3	42.6	0.3
Family Distribution by Income Level	557,783	20.4	17.5	20.7	41.4	0.0
Household Distribution by Income Level	892,305	23.6	16.3	17.6	42.5	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$84,758	Median Housing Value			\$195,867
			Median Gross Rent			\$949
			Families Below Poverty Level			7.3%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent.						
* The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the St. Louis MMSA AA was \$171,176 in 2020-2021 and was \$195,867 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 29.7 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$35,359 or \$42,379 and moderate-income families earned less than \$56,574 or \$67,806. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$884 or \$1,059 for low-income borrowers and \$1,414 or \$1,695 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$919 or \$1,051. Many low-income borrowers would have had difficulty affording a mortgage loan in the St. Louis MMSA AA during the 2020 and 2021 evaluation period.

Data from Moody's Analytics over the evaluation period indicated that the St. Louis MMSA AA has recovered from its unemployment spike seen at the start of 2020, and has lower unemployment than prior to the pandemic, but still lagged the rest of the state in overall unemployment. Recovery was most notably seen in the manufacturing sector, which recovered at a faster rate than expected with further job creation in the sector contributing to the overall lower unemployment rate, but the healthcare, finance, and government sectors were lagging in their recovery from the pandemic.

Based on data from the BLS, the unemployment rate in the St. Louis MMSA AA was 3.5 percent in January 2020, as high as 11.7 percent in April 2020, and was 2.4 percent in December 2022. Major employers in the AA included: BJC Healthcare; Walmart Inc.; Mercy Healthcare; Washington University of St. Louis; Boeing Defense Space & Security; SSM Health Care System; Scott Air Force Base; Schnuck Markets Inc.; Mercy Clinic; The Archdiocese of St. Louis; McDonalds Corp.; and St. Louis University.

Examiners reviewed four community contact interviews conducted during the evaluation period: one from an economic development agency, one from a CDFI, one from an SBDC, and one from a community resources organization. These sources identified the following needs within the community:

- Affordable housing
- Micro lending, or lending with a principal balance of less than \$50,000
- Financial counseling and education, including homeownership and first-time homebuyer assistance
- Small business development and counseling
- Identifying and providing funding for small businesses led by women and minorities

The St. Louis MMSA AA offered adequate opportunities to meet the identified needs. There were a variety of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted eight certified CDFIs, three HUD-approved housing counseling agencies, and one SBA small business development centers serving the AA.

Scope of Evaluation in St. Louis MMSA

Examiners conducted a full-scope review of the St. Louis MMSA AA. Examiners emphasized small loans to businesses versus home mortgage lending in arriving at the overall conclusions. Small loans to

businesses represented the majority of BHB's lending in this AA. BHB did not originate or purchase a sufficient volume of small loans to farms to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS MMSA

LENDING TEST

BHB's performance under the Lending Test in the St. Louis MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the St. Louis MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
St. Louis	607	1,055	5	18	1,685
Total	607	1,055	5	18	1,685

Dollar Volume of Loans (\$000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Full-Scope:					
St. Louis	130,795	101,920	536	66,111	299,362
Total	130,795	101,920	536	66,111	299,362

BHB ranked 13th out of 79 depository institutions (top 17 percent) with a deposit market share of 1.6 percent.

For home mortgage loans, BHB's market share of 0.2 percent ranked 88th out of 636 lenders (top 14 percent). The top three lenders were U.S. Bank, N.A. with 5.6 percent market share, DAS Acquisition Company, LLC with 4.5 percent market share, and Wells Fargo Bank, N.A. with 4.1 percent market share. Of the top 15 home mortgage lenders in this AA, 10 were NDFIs, one was a credit union, and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 0.6 percent ranked 31st out of 196 lenders (top 16 percent). The top three lenders were U.S. Bank, N.A. with 13.9 percent market share, American Express National Bank with 13.3 percent market share, and JPMorgan Chase Bank, N.A. with 10.1 percent market share. Of the top 10 small business lenders in this AA, seven were institutions with large business credit card portfolios with average loan sizes of \$23,000 or less. BHB's average small business loan size was \$84,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate. Examiners considered the low availability of properties in low- and moderate-income geographies ready for purchase, which negatively impacted home purchase activity in those geographies.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively. Included in this analysis were 104 PPP loans totaling \$8.9 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA and significant increase in home values during the evaluation period, which limited the affordability for low-income families.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans originated or purchased to low-income borrowers was near-to the percentage of families located in the AA.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 48.7 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 400 out of 526 PPP loans, totaling approximately \$30.4 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 18 CD loans totaling over \$66.1 million, which represented 32.9 percent of allocated tier 1 capital. BHB utilized complex CD loans with additional funding provided by organizations within the AA. CD loans were impactful as they were responsive to identified community needs for affordable housing. By dollar volume, 39.1 percent funded revitalization and stabilization efforts, 38.6 percent funded affordable housing that provided 155 units, and 22.3 percent funded economic development activities. This included 12 PPP loans totaling \$25.8 million that qualified as CD within the AA.

Examples of CD loans in the AA include:

- A \$25.5 million loan to finance the rehabilitation of a multifamily housing complex. The renovation provided an additional 150 units of affordable housing in the AA, which the development specifically targeted to individuals 62 years of age or older that earn 60 percent or less of the area median income. This loan was part of a complex financing package consisting of multiple sources, including a \$11.4 million LIHTC investment by BHB.
- Two loans totaling \$7.4 million to a local small business for expansion. The business used the loan proceeds to construct two new facilities, creating multiple new jobs for low- and moderate-income individuals.

Product Innovation and Flexibility

BHB used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 92 loans totaling \$1.8 million among the various flexible lending products available in the St. Louis MMSA AA. This included three Home Possible loans totaling \$430,375, one FHA loan totaling \$168,875, one HFA loan totaling \$111,500, 35 Credit Builder Loans totaling \$47,000, and 52 Special Purpose Credit Program Loans totaling \$880,000. In addition, BHB facilitated the use of three DPA grants totaling \$15,000 and three BHB grants totaling \$6,600.

INVESTMENT TEST

BHB's performance under the Investment Test in the St. Louis MMSA AA is rated Outstanding.

Based on a full-scope review, BHB's performance in the St. Louis MMSA AA was excellent.

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)
Full-Scope:										
St. Louis	20	8,047	36	34,846	56	100	42,893	100	5	20,350
Total	20	8,047	36	34,846	56	100	42,893	100	5	20,350
<small>*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.</small>										

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current-

and prior-period investments represented 21.3 percent of tier 1 capital allocated to the AA. This did not include five unfunded commitments totaling \$20.4 million, an additional 10.1 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB occasionally used innovative and/or complex investments to support CD initiatives. BHB had eight qualified investments and grants totaling \$16.2 million related to affordable housing, four totaling \$12.7 million related to economic development, 30 totaling \$8.5 million to community service organizations that provided needed services to low- and moderate-income individuals, and 14 totaling \$5.5 million for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- An \$11.4 million investment in a LIHTC fund that invested in multifamily affordable rental housing. The investment financed the rehabilitation of a multifamily housing complex which provided 150 additional units of affordable housing in the AA. The development specifically targeted the units to individuals 62 years of age or older that earn 60 percent or less of the area median income. This investment was part of a complex financing package that included a \$25.5 million CD loan.
- A \$10 million investment in an SBIC fund that invested in the AA. The fund made subordinated debt and minority equity co-investments in lower middle-market companies that fit the SBA's definition of a small business.
- Over \$1.4 million in current- and prior-period investments in a CDFI that provided loans, consulting, and development support to mission-driven nonprofits. The organization's mission was to ensure people in all communities, including low- and moderate-income individuals and families, had equitable access to health care, childcare, housing, education, and other fundamental necessities.

SERVICE TEST

BHB's performance under the Service Test in St. Louis MMSA AA is rated High Satisfactory.

Based on a full-scope review, BHB's performance in the St. Louis MMSA AA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
St. Louis	100.0	14	100.0	0.0	7.1	42.9	50.0	0.0	7.7	17.5	38.3	36.2	0.33
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in moderate-income geographies was well below the percentage of the population living within those geographies. BHB did not have any branches in low-income geographies. Examiners further considered four middle- or upper-income branches, two that were "across the street" from a low- or moderate-income geography and two that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 18 ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 45.1 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 2.2 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a neutral impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
St. Louis	0	2	0	0	-1	-1	0
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, BHB's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB closed two branches, neither of which were in a low- or moderate-income geography. The branch closures resulted from BHB reassessing its delivery services due to changes in usage.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Twelve branches had the same lobby and drive-thru hours, Monday through Friday, 9:00 a.m. to 5:00 p.m. and Saturdays, 9:00 a.m. to noon. The two remaining branches, one in a middle-income geography and one in an upper-income geography did not have drive-thru facilities and were closed on Saturdays.

BHB opened 461 SMART Money checking accounts and 35 Credit Builder accounts in the St. Louis MMSA AA during the evaluation period.

Community Development Services

BHB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, two bank employees conducted four financial education events totaling 14 hours in coordination with two different organizations. Approximately 130 participants attended these classes. These events included financial literacy and banking services for individuals, and small business education such as managing cash flow, understanding marketing, accounting, and understanding the loan process. Leadership was evident by three bank employees

spending 232 hours participating on boards and committees for seven different CD organizations. Additionally, 12 employees provided 53 hours of general qualified volunteer activities.

Examples of CD services in the AA include:

- A bank employee served on the board of directors of a nonprofit CDC that, in addition to providing affordable housing in the AA, supported other CDCs with predevelopment lending, technical assistance, and training.
- A bank employee was an advisory board member of an affordable housing organization. The organization acquired and redeveloped affordable housing, workforce, and primary rental housing for low- and moderate-income individuals and families. In addition, the organization provided community-based services and activities that enhanced the lifestyle of its residences, including after school programs, activities for seniors, civic engagement, and wellness.

State Ratings

State of Arizona

CRA rating for the state of Arizona: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, the overall geographic distribution of originated and purchased home mortgage loans, small loans to businesses, and small loans to farms was good and the overall borrower distribution was adequate.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.
- BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Institution's Operations in the State of Arizona

BHB delineated three AAs in the state of Arizona. They included a portion of the Phoenix-Mesa-Chandler, AZ (Phoenix) MSA and the entire Prescott, AZ (Prescott) and Tucson, AZ (Tucson) MSAs. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had almost \$5 billion in deposits in these AAs, which represented 3.7 percent of BHB's total deposits. During the evaluation period, BHB made \$1.6 billion or 12.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 48 office locations and 194 ATMs, of which 47 were deposit-taking, within these AAs. BHB ranked sixth in deposit market share with 2.4 percent. The top three competitors had 62.7 percent of the market. These competitors included JPMorgan Chase Bank, N.A. with 173 branches and 25.5 percent market share, Wells Fargo Bank, N.A. with 134 branches and 19.9 percent market share, and Bank of America, N.A. with 110 branches and 17.3 percent market share. There were 59 other FDIC-insured depository institutions with 393 offices within BHB's AAs.

Phoenix MSA

The following tables provide a summary of the demographics, including housing and business information, for the Phoenix MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Phoenix MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	792,533	7.0	15.2	29.5	47.8	0.5
Farms by Geography	12,656	7.2	18.5	28.9	45.1	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Phoenix MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,009	6.3	25.7	31.1	34.5	2.4
Population by Geography	4,420,568	5.8	25.6	32.6	35.4	0.6
Housing Units by Geography	1,765,880	5.4	26.5	33.5	34.3	0.4
Owner-Occupied Units by Geography	1,008,487	2.6	20.6	34.7	41.9	0.1
Occupied Rental Units by Geography	588,297	10.0	35.6	31.6	22.1	0.7
Vacant Units by Geography	169,096	5.6	29.3	32.5	32.0	0.6
Businesses by Geography	936,819	4.0	18.3	28.2	48.9	0.6
Farms by Geography	14,841	4.4	20.3	29.9	44.7	0.7
Family Distribution by Income Level	1,047,899	20.4	17.9	20.0	41.7	0.0
Household Distribution by Income Level	1,596,784	22.3	16.9	18.5	42.3	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Phoenix MSA – 2022			
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA	\$78,930	Median Housing Value	\$292,183
		Median Gross Rent	\$1,221
		Families Below Poverty Level	9.1%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.			

The Phoenix MSA AA consisted of Maricopa County, one of the two counties that comprised the MSA. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 3.2 percent of total bank deposits. During the evaluation period, BHB made over \$1.4 billion or 11 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB operated 39 branches in the AA and had a 2.4 percent deposit market share which ranked sixth among all institutions. Competition was significant with 60 other FDIC-insured depository institutions operating 635 offices in the AA. The top four competitors included JPMorgan Chase Bank, N.A. with 130 branches and 25.4 percent market share, Wells Fargo Bank, N.A. with 100 branches and 19 percent market share, Bank of America, N.A. with 87 branches and 17.5 percent market share, and Western Alliance Bank with six branches and 14.9 percent market share.

The median housing value of owner-occupied housing units for the Phoenix MSA AA was \$203,811 in 2020-2021 and was \$291,183 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 51.1 percent over the evaluation period. The housing market was waning as rising mortgage rates and declining affordability lowered demand.

For 2021, the number of mortgage lenders originating loans in the Phoenix AA was comparable to the number in the Chicago MMSA AA despite the Phoenix MSA AA having only 42.8 percent of the population and 46 percent of the owner-occupied housing units. Out-of-state investors intensified the level of competition by purchasing thousands of homes during the evaluation period. Data from the Maricopa County Assessor's Office indicated that the 25 largest purchasers of single-family homes since 2020 were limited liability corporations, with the top five purchasing nearly 6,000 single-family residences in two years.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$31,843 or \$39,465 and moderate-income families earned less than \$50,949 or \$63,144. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$796 or \$987 for low-income borrowers and \$1,274 or \$1,579 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$1,094 or \$1,569. Many low-income borrowers would have had difficulty affording a mortgage loan in the Phoenix MSA AA during both evaluation periods.

Data from Moody's Analytics over the evaluation period indicated that the Phoenix MSA AA experienced broad-based job growth, lifting payrolls further above their pre-pandemic peak. Significant growth in manufacturing was the main driver with industry payrolls 7 percent above February 2020 lev-

els. The unemployment rate was more than a full percentage point below its previous cyclical low, though it ticked up as the labor force grew rapidly.

Based on data from the BLS, the unemployment rate in the Phoenix MSA AA was 4.2 percent in January 2020, was as high as 12.6 percent in April 2020, and was to 2.9 percent in December 2022. Major employers in the AA included: Banner Health System; Walmart Inc.; Fry's Food Stores; Wells Fargo Bank, N.A.; and Arizona State University.

Examiners reviewed local area government consolidated plans and reviewed one community contact interview to an economic development agency. These sources identified the following needs within the community:

- Affordable rental and owner-occupied housing
- Supportive services for the homeless or persons experiencing a housing crisis
- Investment in public facilities and essential infrastructure
- Develop and strengthen small businesses by providing access to workforce development and job opportunities

The Phoenix MSA AA offered adequate opportunities to meet the identified needs. There were a variety of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted at least six certified CDFIs, five HUD-approved housing counseling agencies, and three SBA Small Business Development centers serving the AA.

Tucson MSA

The following tables provide a summary of the demographics, including housing and business information, for the Tucson MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tucson MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	7.9	27.8	32.0	31.5	0.8
Population by Geography	998,537	9.1	27.1	31.2	32.1	0.5
Housing Units by Geography	446,769	8.8	27.1	31.6	32.4	0.1
Owner-Occupied Units by Geography	238,329	4.7	21.4	32.9	41.0	0.0
Occupied Rental Units by Geography	151,329	14.9	35.4	29.3	20.2	0.3
Vacant Units by Geography	57,111	10.0	28.4	32.1	29.4	0.1
Businesses by Geography	125,786	6.0	22.1	28.5	42.4	1.0
Farms by Geography	2,576	5.9	21.6	33.0	39.2	0.3
Family Distribution by Income Level	239,972	22.2	17.3	19.1	41.4	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Tucson MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Household Distribution by Income Level	389,658	24.7	16.1	16.9	42.3	0.0
Median Family Income MSA - 46060 Tucson, AZ MSA		\$57,457	Median Housing Value			\$172,844
			Median Gross Rent			\$846
			Families Below Poverty Level			13.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Tucson MSA - 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	270	3.7	30.4	30.0	32.2	3.7
Population by Geography	1,043,433	3.9	32.5	28.5	33.6	1.6
Housing Units by Geography	463,236	3.7	33.0	29.3	33.0	1.0
Owner-Occupied Units by Geography	263,142	2.0	26.3	30.5	40.4	0.8
Occupied Rental Units by Geography	147,800	6.3	44.3	27.6	20.6	1.2
Vacant Units by Geography	52,294	4.5	35.0	28.7	30.7	1.0
Businesses by Geography	149,418	2.1	25.3	26.4	44.0	2.1
Farms by Geography	3,006	2.7	29.2	27.8	39.5	0.8
Family Distribution by Income Level	250,845	21.9	17.4	19.6	41.2	0.0
Household Distribution by Income Level	410,942	24.1	16.2	17.4	42.4	0.0
Median Family Income MSA - 46060 Tucson, AZ MSA		\$69,466	Median Housing Value			\$207,996
			Median Gross Rent			\$952
			Families Below Poverty Level			11.3%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The Tucson MSA AA consisted of Pima County. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 0.3 percent of total bank deposits. During the evaluation period, BHB made over \$98 million or 0.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB operated six branches in the AA and had a 2 percent deposit market share which ranked eighth among all institutions. Competition was significant with 18 other FDIC-insured depository institutions operating 137 offices in the AA. The top four competitors included Wells Fargo Bank, N.A. with 28 branches and 27.1 percent market share, JPMorgan Chase Bank, N.A. with 34 branches and 24.6 percent market share, Bank of America, N.A. with 21 branches and 17.3 percent market share, and Zions Bancorporation, N.A. with seven branches and 5.7 percent market share.

The median housing value of owner-occupied housing units for the Tucson MSA AA was \$172,844 in 2020-2021 and was \$207,996 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 48.1 percent over the evaluation period.

For 2021, the number of mortgage lenders originating loans in the Tucson MSA AA was 65 percent of those in the Phoenix MMSA AA despite the Tucson MSA AA having only 24.9 percent of the population and 27.2 percent of the owner-occupied housing units. The level of competition was intensified by the out-of-state investors who purchased thousands of homes in Arizona during the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$28,729 or \$34,733 and moderate-income families earned less than \$45,966 or \$55,573. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$718 or \$868 for low-income borrowers and \$1,149 or \$1,389 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$928 or \$1,117. Low-income borrowers would have had difficulty affording a mortgage loan in the Tucson MSA AA during both evaluation periods.

Data from Moody's Analytics over the evaluation period indicated that the Tucson MSA AA has experienced sluggish job growth. By July 2022, Tucson's economy was improving but remains behind other areas of the state. Job growth had fallen further behind the state and regional averages, leaving payrolls down about 1.5 percent relative to pre-pandemic levels, versus more than 2 percent higher in Arizona and the Mountain West. This was due to public sector employment that remained well below the pre-pandemic levels and had hardly improved since late 2020.

Based on data from the BLS, the unemployment rate in the Tucson MSA AA was 4.6 percent in January 2020, as high as 13 percent in April 2020, and 3.3 percent in December 2022. Major employers in the AA included: Raytheon Missile Systems; University of Arizona; Davis-Monthan Air Force Base; Banner-University Medicine (UA Healthcare); Freeport-McMoran Mine; Walmart Inc.; Tucson Medical Center; and Carondelet Health Network.

Examiners reviewed local area government consolidated plans and two community contact interviews conducted during the evaluation period: one each from an economic development agency and a community investment corporation, which identified the following needs within the community:

- Affordable housing, including funding for housing-related activities
- First-time homebuyer programs
- Flexible lending products targeted to woman- and minority-owned businesses
- Financing for small businesses
- Acquisition and construction loans for mixed-use projects

The Tucson MSA AA offered adequate opportunities to meet identified needs. There were a variety of non-profit organizations that work with financial institutions, local government, foundations, and others

to meet the CD needs of the area. Examiners noted at least six certified CDFIs, four HUD-approved housing counseling agencies, and one SBA Small Business Development centers serving the AA.

Scope of Evaluation in the State of Arizona

Examiners selected two AAs, the Phoenix MSA and the Tucson MSA, for analysis using full-scope procedures. The Phoenix MSA AA was the largest AA in the state with 84.9 percent of the deposits and 85.2 percent of the lending activity and received the most weighting when determining conclusions. The Tucson MSA AA was the second largest with 9.3 percent of the deposits and 9.4 percent of the lending activity. Examiners analyzed the Prescott MSA AA using limited-scope procedures.

In the full-scope AAs, examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion. Small loans to businesses represented the majority of BHB's lending in these AAs. In the limited-scope AA, examiners weighted home mortgage loans and small loans to businesses equally. BHB originated enough small loans to farms to conduct a meaningful analysis only in the Phoenix MSA AA during the 2020-2021 period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

BHB's performance under the Lending Test in Arizona is rated Outstanding. Performance in the limited-scope AA did not alter the overall Lending Test conclusion for the state of Arizona.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, BHB's performance in both the Phoenix MSA and Tucson MSA AAs was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Phoenix	2,956	3,215	27	38	6,236	85.2	84.9
Tucson	293	380	4	6	683	9.3	9.4
Limited-Scope:							
Prescott	203	196	1	0	400	5.5	5.7
Total	3,452	3,791	32	44	7,319	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Phoenix	1,121,150	277,565	2,642	130,085	1,531,442	88.1	84.9
Tucson	67,712	30,489	232	48,832	147,265	8.5	9.4
Limited-Scope:							
Prescott	48,640	11,148	19	0	59,807	3.4	5.7
Total	1,237,502	319,202	2,893	178,917	1,738,514	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

Phoenix MSA

Lending levels reflected excellent responsiveness to AA credit needs in the Phoenix MSA AA.

BHB ranked sixth out of 61 depository institutions (top 10 percent) with a deposit market share of 2.4 percent.

For home mortgage loans, BHB's market share of 0.3 percent ranked 71st out of 994 lenders (top 8 percent). The top three lenders were United Wholesale Mortgage with 8 percent market share, Rocket Mortgage with 7.7 percent market share, and Fairway Independent Mort Corp with 3.7 percent market share. Of the top 15 home mortgage lenders in this AA, 12 were NDFIs and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 0.7 percent ranked 18th out of 303 lenders (top 6 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 18.8 percent market share, American Express National Bank with 16.5 percent market share, and Wells Fargo Bank, N.A. with 10.6 percent market share. Of the top 10 small business lenders in this AA, nine were institutions with large business credit card portfolios with average loan sizes of \$26,000 or less. BHB's average small business loan size was \$69,000.

For small loans to farms, BHB's market share of 1.8 percent ranked seventh out of 38 lenders (top 19 percent). The top three lenders were Wells Fargo Bank, N.A. with 32.6 percent market share, JPMorgan Chase Bank, N.A. with 32.4 percent market share, and U.S. Bank, N.A. with 9.2 percent market share.

Tucson MSA

Lending levels reflected excellent responsiveness to AA credit needs in the Tucson MSA AA.

BHB ranked eighth out of 19 depository institutions (top 43 percent) with a deposit market share of 2 percent.

For home mortgage loans, BHB's market share of 0.1 percent ranked 95th out of 646 lenders (top 15 percent). The top three lenders were Nova Home Loans with 10.5 percent market share, Rocket Mortgage with 6.2 percent market share, and Wells Fargo Bank, N.A. with 4 percent market share. Of the top 15 home mortgage lenders in this AA, 12 were NDFIs and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 0.7 percent ranked 18th out of 143 lenders (top 13 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 17 percent market share, American Express National Bank with 14.8 percent market share, and Wells Fargo Bank, N.A. with 12.4 percent market share. Of the top 10 small business loan lenders in the AA, eight were institutions with large business credit card portfolios with average loan sizes of \$27,000 or less. BHB's average small business loan size was \$72,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to Table O in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of BHB's home mortgage loan originations and purchases.

Phoenix MSA

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders, including the significant operations of non-depository mortgage lenders, and large number of investment firms with disproportionate housing purchasing operations within the AA.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans to low-income geographies was near-to the percentage of owner-occupied housing units in those geographies and equaled the aggregate percentage of all reporting lenders.

Tucson MSA

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders, including the significant operations of non-depository mortgage lenders, the large number of investment firms with disproportionate housing purchasing operations within the AA, and that several low- and moderate-income geographies in the Tucson MSA AA are either wholly or substantially made up of Indian lands, national forests, or military installations.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies was significantly below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans in low-income geographies was near-to, and in moderate-income geographies was well below, the percentage of owner-occupied housing units in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was near-to, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Phoenix MSA

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. Included in this analysis were 476 PPP loans totaling \$60.5 million to small businesses located in low- or moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Tucson MSA

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies was near-to, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders. Included in this analysis were 70 PPP loans totaling \$4.4 million to small businesses located in low- or moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies.

Small Loans to Farms

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

Phoenix MSA

The geographic distribution of small loans to farms was good. Examiners considered that small farm lending was not a primary focus for BHB.

For 2020 through 2021, the percentage of small loans to farms originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of farms located in those geographies. The percentage of small loans to farms originated or purchased in both low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders. Included in this analysis were five PPP loans that totaled \$667,000 to a small farm located in a low- and moderate-income geography that provided support during the COVID-19 pandemic.

For 2022, BHB did not originate or purchase a sufficient volume of small farm loans to perform a meaningful analysis.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's home mortgage loan originations and purchases.

Phoenix MSA

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered the impact of heavy competition among home mortgage lenders, the large number of investment firms with disproportionate housing purchasing operations, and the significant operations of non-depository mortgage lenders within the AA. Examiners also considered housing costs in relation to the median family incomes in the AA, which limited the affordability for many low-income borrowers.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers was below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Tucson MSA

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing competition, including the presence of multiple non-depository mortgage lenders, private investors in residential real estate activities, and the large number of other HMDA

reporting institutions within the AA. Examiners also considered housing costs in relation to the median family incomes in the AA, which limited the affordability for many low-income borrowers.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers was well below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was well below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA.

Small Loans to Businesses

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

Phoenix MSA

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 55.3 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 1,441 out of 1,443 PPP loans, totaling approximately \$28.3 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Tucson MSA

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and below the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 66 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 148 out of 213 PPP loans, totaling approximately \$9.2 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Farms

Refer to Table T in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's originations and purchases of small loans to farms.

Phoenix MSA

The distribution of loans to farms of different sizes was adequate. Examiners considered that small farm lending was not a primary focus for BHB.

For 2020 through 2021, the percentage of loans to small farms originated or purchased was well below both the percentage of small farms in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 54.2 percent of its small loans to farms, including PPP loans. Examiners considered the fact that BHB originated 13 out of 18 PPP loans, totaling approximately \$1.2 million, to farms with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Community Development Lending

Phoenix MSA

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 38 CD loans totaling over \$130.1 million, which represented 27.8 percent of allocated tier 1 capital. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 53.9 percent funded affordable housing that provided 430 units, 42 percent funded revitalization and stabilization efforts, and 4.1 percent funded community service activities. This included 31 PPP loans totaling \$54 million within the AA that qualified as CD.

Examples of CD loans in the AA include:

- A \$42.6 million loan to finance the construction of a new multifamily housing complex. The project provided 320 units of housing, with 178 of these units qualifying as affordable housing under the FFIEC affordable housing limit for the AA.
- A \$26.7 million loan to finance the construction of a new apartment complex. The project provided 100 units of affordable housing. HAP contracts and LIHTC restrictions limiting households to those earning 60 percent or less of the area median income secured all units. This loan was part of a complex financing package consisting of multiple sources.
- A \$2.2 million term loan to purchase and renovate an additional facility for a nonprofit organization that specialized in providing services and therapies to individuals with autism and their families. The organization derived most of its revenues from services provided to Medicaid recipients.

Tucson MSA

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made six CD loans totaling over \$48.8 million, which represented 94.7 percent of allocated tier 1 capital. BHB utilized complex CD loans in conjunction with organizations within the AA, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 100 percent of these loans funded affordable housing that provided 347 units.

Examples of CD loans in the AA include:

- A \$18.1 million loan to finance the construction of an affordable multifamily housing complex. The project contained 23 building with 127 units located in four different low-income geographies. The development restricted all units to households earning 60 percent or less of the area median income. This loan was part of a complex financing package with three other entities.
- A \$8.4 million loan to purchase and rehabilitate a former hotel into a permanent supportive housing development. The project provided 100 new units of affordable housing targeted to households earning 60 percent or less of the area median income. Eighty of the units had project-based vouchers, with 20 set aside for the homeless. The remaining 20 units are traditional LIHTC units. This loan was part of a complex financing package consisting of multiple sources.

Product Innovation and Flexibility

Phoenix MSA

BHB used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 326 loans totaling \$8.8 million among the various flexible lending products available in the Phoenix MSA AA. This included 11 Home Possible loans totaling \$2 million, six FHA loans totaling \$1.8 million, seven NHLP loans totaling \$2.9 million, 157 Credit Builder loans totaling \$225,375, and 145 Special Purpose Credit Program loans totaling \$1.8 million. In addition, BHB facilitated the use of 10 DPAs totaling \$50,000 and 11 BHB grants totaling \$33,000.

Tucson MSA

BHB used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 24 loan totaling \$455,000 among the various flexible lending products available in the Tucson MSA AA. This included one Home Possible loan totaling over \$250,000, 10 Credit Builder loans totaling \$24,000, and 13 Special Purpose Credit Program loans totaling \$179,000.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, BHB's performance in the Prescott MSA AA was adequate, which was weaker than BHB's overall performance under the Lending Test in the full-scope AAs. The weaker performance was due to lower geographic distributions and no CD lending activity. Performance in the limited-scope AA did not alter the overall Lending Test conclusion for the state of Arizona.

Refer to Tables O through T in the state of Arizona section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

BHB's performance under the Investment Test in Arizona is rated Outstanding. Performance in the limited-scope AA did not alter the overall Investment Test conclusion for the state of Arizona.

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, BHB's performance in both the Phoenix MSA and Tucson MSA AAs was excellent.

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)
Full-Scope:										
Phoenix	12	28,783	58	32,862	70	70.7	61,645	87	11	20,432
Tucson	5	5,150	15	2,658	20	20.2	7,808	11	3	1,748
Limited-Scope:										
Prescott	0	0	7	1,358	7	7.1	1,358	1.9	0	0
Statewide/Regional:										
Greater Arizona	2	13	0	0	2	2.0	13	0.02	1	286
Total	19	33,946	80	36,878	99	100.0	70,824	99.9	15	22,466
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. **Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. *** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.										

Phoenix MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 13.2 percent of tier 1 capital allocated to the AA. This did not include 11 unfunded commitments totaling \$20.4 million, an additional 4.4 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB occasionally used innovative and/or complex investments to support CD initiatives. BHB made six qualified investments and grants totaling \$29.4 million related to economic development, 16 totaling

\$19.5 million related to affordable housing, 17 totaling \$10.1 million for revitalization and stabilization efforts, and 31 totaling \$2.7 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A \$10 million investment in a real estate fund designed to develop, acquire, and invest in affordable housing within the AA. The organization used the funds to invest in a workforce housing development with 212 total units, 140 of which were reserved for individuals and families earning 80 percent or less of the area median income.
- A \$10 million investment in a private equity SBIC fund that provided funding to companies located in low- and moderate-income geographies and supported low- and moderate-income workers. The fund assisted with the creation, retention, and improvement of jobs for low- and moderate-income individuals and improving the economic outcome of the AA.

Tucson MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 15.1 percent of tier 1 capital allocated to the AA. This did not include three unfunded commitments totaling \$1.7 million, an additional 3.4 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB occasionally used innovative and/or complex investments to support CD initiatives. BHB had five qualified investments and grants totaling \$5.4 million related to affordable housing, one totaling \$2.3 million related to economic development, and 14 totaling \$158,000 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A \$2.5 million investment in a real estate fund that bought and preserved affordable, multifamily housing within the AA. The fund invested in properties where households earning 80 percent or less of the area median income occupied at least 51 percent of the units.
- Grants totaling \$60,000 to a community health center that provided comprehensive, affordable, quality care to area residents. Services included adult medicine, behavioral health, dental, wellness, family medicine, women's health, pediatrics, pharmacy, and radiology. Over 52 percent of the patients served receive Medicaid assistance and 14 percent were uninsured.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, BHB's performance in the Prescott MSA AA was good, which was weaker than BHB's overall performance under the Investment Test in the full-scope AAs. The weaker performance was due to a lower level of investment activity. Performance in the limited-scope AA did not alter the overall Investment Test conclusion for the state of Arizona.

SERVICE TEST

BHB's performance under the Service Test in Arizona is rated High Satisfactory. Performance in the limited-scope AA did not alter the Service Test conclusion for the state of Arizona.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, BHB's performance in both the Phoenix MSA and Tucson MSA AAs was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in BHB's AAs.

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA
Full-Scope:													
Phoenix	84.9	39	81.3	0.0	25.6	35.9	38.5	0.0	5.8	25.6	32.6	35.4	0.6
Tucson	9.4	6	12.5	0.0	16.7	33.3	50.0	0.0	3.9	32.5	28.5	33.6	1.6
Limited-Scope:													
Prescott	5.7	3	6.2	0.0	33.3	33.3	33.3	0.0	0.0	18.5	67.4	14.1	0.0
*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. **The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

Phoenix MSA

BHB's distribution of branches in moderate-income geographies equaled the percentage of the population living within those geographies. BHB did not have any branches in low-income geographies. Examiners further considered 12 middle- or upper-income branches, seven that were "across the street" from a low- or moderate-income geography and five that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 186 ATMs in the AA, of which 39 were deposit-taking. BHB provided data that indicated 54.5 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 12.4 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Tucson MSA

BHB's distribution of branches in moderate-income geographies was below the percentage of the population living within those geographies. BHB did not have any branches in low-income geographies. Examiners further considered two middle- or upper-income branches, both of which were "across the street" from a low- or moderate-income geography, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had five ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 46.9 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 16.1 percent from fourth quarter 2019. While these systems provided additional delivery availability and access to banking services to both retail and business customers, the level of usage had a neutral impact on the Service Test conclusion.

Distribution of Branch Openings/Closings*							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA**
Full-Scope:							
Phoenix	1	3	0	-1	0	-1	0
Tucson	0	0	0	0	0	0	0
Limited-Scope:							
Prescott	0	0	0	0	0	0	0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							
**The NA category consists of geographies that have not been assigned an income classification.							

Phoenix MSA

To the extent changes have been made, BHB's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB opened one branch in an upper-income geography and closed three branches, one in a moderate-income geography and two in upper-income geographies. The branch closures resulted from BHB reassessing its delivery services due to changes in usage.

Services, including where appropriate, business hours, varied in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. While all branches had the same lobby hours and drive-thru hours of 9:00 a.m. to 5:00 pm, Monday through Friday, only 13 branches were open from 9:00 a.m. to noon on Saturdays, none of which were in low- or moderate-income geographies.

BHB opened 1,904 SMART Money checking accounts and 157 Credit Builder accounts in the Phoenix MSA AA during the evaluation period.

Tucson MSA

BHB did not open or close any branches in the Tucson MSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. While all branches had the same lobby hours and drive-thru hours of 9:00 a.m. to 5:00 pm, Monday through Friday, only one branch, located in a moderate-income geography was open from 9:00 a.m. to noon on Saturdays.

BHB opened 116 SMART Money checking accounts and 10 Credit Builder accounts in the Tucson MSA AA during the evaluation period.

Community Development Services

Phoenix MSA

BHB provided an adequate level of CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, two bank employees conducted nine financial education events totaling 20 hours in coordination with five different organizations. Approximately 88 participants attended these classes. These events included financial literacy and first-time homebuyers' programs for low- and moderate-income individuals. Leadership was evident by seven bank employees spending over 187 hours participating on boards and committees for seven different CD organizations. Additionally, 20 employees provided 203 hours of general qualified volunteer activities.

Examples of CD Services in the AA include:

- A senior level bank employee provided 60 hours serving as a board member of the local chapter of a nationwide nonprofit organization that provided children from low- and moderate-income families with after school and summer programs. These included character and leadership skill building, education and career development classes, art education, sports, fitness, and recreation programs.
- A senior level bank employee provided 48 hours serving as a board member of the local chapter of a nationwide nonprofit organization that provided services to the community, including predominately low- and moderate-income children, families, and individuals. Services include access to healthcare and nutritional food, affordable housing including rent and utility assistance, housing navigators and eviction prevention, educational and literacy programs, and workforce development including career guidance, job training, mentoring, and financial assistance.

Tucson MSA

BHB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, three bank employees conducted three financial education events totaling 17 hours in coordination with two different organizations. Approximately 51 participants attended these classes. These events included financial literacy programs for low- and moderate-income individuals. Leadership was evident by two bank employees spending 130 hours

participating on boards and committees for two different CD organizations. Additionally, two employees provided two hours of general qualified volunteer activities.

Examples of CD Services in the AA include:

- A senior level bank employee provided 110 hours serving as a board member of a nonprofit organization fighting homelessness. The organization provided emergency shelter and re-housing for individual, couples, and families experiencing homelessness. The organization also provided referrals to support services and other resources.
- A senior level bank employee provided 48 hours serving as a committee member of the local chapter of a nationwide nonprofit organization that provided services to the community, including predominately low- and moderate-income children, families, and individuals. The services focus on improving educational and life outcomes for children and young adults, employment and financial outcomes for adults and families, and the quality of living and dying for older people and their families.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, BHB's performance in the Prescott MSA AA was adequate, which was weaker than BHB's overall performance under the Service Test in the full-scope area. The weaker performance was due to poorer branch distributions. Performance in the limited-scope AA did not alter the overall Service Test conclusion for the state of Arizona.

State of Florida

CRA rating for the state of Florida: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution of originated and purchased home mortgage loans and small loans to businesses was good and overall borrower distribution was adequate.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the State of Florida

BHB delineated six AAs in the state of Florida. They included the entire North Port-Sarasota-Bradenton, FL (Sarasota); Cape Coral-Fort Myers, FL (Cape Coral); Naples-Marco Island, FL (Naples); and Punta Gorda, FL (Punta Gorda) MSAs; the entire West Palm Beach-Boca Raton-Boynton Beach, FL (West Palm Beach) MD; and one of the four counties in the Tampa-St. Petersburg-Clearwater, FL (Tampa) MSA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just under \$2 billion in deposits in these AAs, which represented 1.5 percent of BHB's total deposits. During the evaluation period, BHB made \$769.9 million or 6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 17 office locations and 20 ATMs, of which 19 were deposit-taking, within these AAs. BHB ranked 20th in deposit market share with 1 percent. The top four competitors had 53.9 percent of the market and included Bank of America, N.A. with 139 branches and 17.5 percent market share, Wells Fargo Bank, N.A. with 147 branches and 14.6 percent market share, Truist Bank with 129 branches and 11.5 percent market share, and JPMorgan Chase Bank, N.A. with 129 branches and 10.3 percent market share. There were 86 additional FDIC-insured depository institutions with 661 offices within BHB's AAs.

BHB did not have any branches in the West Palm Beach, FL MD. There was one deposit-taking ATM in the MD, which required its inclusion in the analysis.

In the state of Florida, BHB focused its business strategy on wealth management and not standard retail bank operations. As a result, BHB had limited branch presence and retail product delivery in most of its Florida AAs, which examiners took into consideration when determining conclusions.

Sarasota MSA

The following tables provide a summary of the demographics, including housing and business information, for the Sarasota MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Sarasota 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	174	2.3	24.7	45.4	26.4	1.1
Population by Geography	735,767	2.8	23.7	47.5	26.0	0.0
Housing Units by Geography	407,196	1.8	22.5	47.5	28.2	0.0
Owner-Occupied Units by Geography	221,993	1.0	18.3	50.7	29.9	0.0
Occupied Rental Units by Geography	87,917	4.5	33.8	43.7	18.1	0.0
Vacant Units by Geography	97,286	1.2	21.6	43.5	33.7	0.0
Businesses by Geography	149,530	1.4	19.6	43.6	35.4	0.0
Farms by Geography	4,202	2.3	20.2	44.1	33.3	0.0
Family Distribution by Income Level	194,874	19.4	19.1	21.0	40.5	0.0
Household Distribution by Income Level	309,910	23.1	17.1	18.1	41.7	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$62,814	Median Housing Value			\$210,725
			Median Gross Rent			\$1,020
			Families Below Poverty Level			8.4%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent.						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Sarasota - 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	217	2.3	22.1	45.6	28.6	1.4
Population by Geography	833,716	2.2	22.3	43.6	31.6	0.2
Housing Units by Geography	439,870	1.8	21.1	45.2	31.8	0.1
Owner-Occupied Units by Geography	255,124	1.2	18.1	46.7	33.8	0.2
Occupied Rental Units by Geography	84,449	3.9	31.6	42.9	21.5	0.1
Vacant Units by Geography	100,297	1.4	19.7	43.4	35.5	0.1
Businesses by Geography	171,572	1.3	15.8	46.3	36.3	0.3
Farms by Geography	4,713	2.0	20.7	45.8	31.1	0.4
Family Distribution by Income Level	216,689	18.8	19.6	20.4	41.2	0.0
Household Distribution by Income Level	339,573	22.0	17.7	18.5	41.8	0.0

Table A – Demographic Information of the Assessment Area						
Assessment Area: Sarasota - 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$77,172	Median Housing Value			\$295,896
			Median Gross Rent			\$1,304
			Families Below Poverty Level			6.1%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent.						
* The NA category consists of geographies that have not been assigned an income classification.						

The Sarasota MSA AA consisted of Manatee and Sarasota counties. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 0.7 percent of total bank deposits. During the evaluation period, BHB made over \$221 million or 1.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB operated 10 branches in the AA and had a 3 percent deposit market share which ranked seventh among all institutions. Competition was significant with 39 other FDIC-insured depository institutions operating 223 offices in the AA. The top four competitors included Bank of America, N.A. with 25 branches and 19.3 percent market share, Truist Bank with 27 branches and 14.1 percent market share, Wells Fargo Bank, N.A. with 23 branches and 12 percent market share, and JPMorgan Chase Bank, N.A. with 26 branches and 10.5 percent market share.

The median housing value of owner-occupied housing units for the Sarasota MMSA AA was \$210,725 in 2020-2021 and was \$295,896 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 72.7 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$31,407 or \$38,586 and moderate-income families earned less than \$50,251 or \$61,738. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$785 or \$965 for low-income borrowers and \$1,256 or \$1,543 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$1,131 or \$1,588. Low-income borrowers would have had difficulty affording a mortgage loan in the Sarasota MMSA during both evaluation periods. Moderate-income borrowers would have had difficulty affording a mortgage loan during the 2022 evaluation period.

Data from Moody's Analytics over the evaluation period indicated that the Sarasota MMSA job growth has outpaced the state and national averages. Robust growth in the healthcare and construction industries offset sluggishness elsewhere, such as professional and business services.

Based on data from the BLS, the unemployment rate in the Sarasota MMSA was 3.2 percent in January 2020, as high as 13.3 percent in April 2020, and 2.5 percent in December 2022. Major employers in the AA included: Publix Super Markets, Inc.; Sarasota Memorial Health Care System; Bealls Inc.; PGT Industries; and Manatee Memorial Hospital.

Examiners reviewed area community action plans and one community contact interview conducted during the evaluation period with an economic development agency that identified the following needs:

- Affordable housing
- Small business loans, especially to businesses that rely on tourism
- Grow and attract industries with jobs paying over the MSA median income
- Support the retention of small and local businesses
- Mortgage financing and consumer loans, especially auto loans

The Sarasota MSA AA presented constrained opportunities to meet the identified needs. There were a limited number of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted one certified CDFI, two HUD-approved housing counseling agencies, and no SBA Small Business Development centers serving the AA.

Scope of Evaluation in the State of Florida

Examiners completed a full-scope review for the Sarasota MSA AA as it had the largest percentage of deposits, 47.3 percent, and the largest percent of deposit market share, 3 percent, among the six AAs. Examiners completed limited-scope reviews for the Cape Coral, Naples, Punta Gorda, and Tampa MSA AAs, and the West Palm Beach MD AA. Examiners based the ratings on the results of the AA that received the full-scope review and BHB's performance in the limited-scope AAs, as applicable.

In all AAs other than the Naples MSA AA, examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusions. In the Naples MSA AA, examiners placed equal weight on home mortgage loans and small loans to businesses. Examiners did not evaluate BHB's small loans to farms in any of the AAs as BHB did not originate or purchase enough small loans to farms to conduct any meaningful analyses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

BHB's performance under the Lending Test in Florida is rated Outstanding. Performance in the limited-scope AAs supported the overall Lending Test conclusion for the state of Florida.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Sarasota MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Full-Scope:							
Sarasota	471	684	11	10	1,176	35.1	47.3
Limited-Scope:							
Cape Coral	143	294	17	4	458	13.7	5.3
Naples	198	195	10	1	404	12.1	22.9
Punta Gorda	32	47	3	1	83	2.5	3.7
Tampa	101	800	3	3	907	27.1	20.8
West Palm Beach	97	210	13	4	324	9.7	0.0
Total	1,042	2,230	57	23	3,352	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Full-Scope:							
Sarasota	170,184	50,704	326	13,140	234,354	29.2	47.3
Limited-Scope:							
Cape Coral	57,777	30,941	1,116	5,300	95,134	11.9	5.3
Naples	167,844	21,924	612	70	190,450	23.7	22.9
Punta Gorda	6,256	5,325	193	1,260	13,034	1.6	3.7
Tampa	25,239	99,325	202	8,635	133,401	16.6	20.8
West Palm Beach	108,325	22,697	944	4,664	136,630	17.0	0.0
Total	535,625	230,916	3,393	33,069	803,003	100.00	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.							

BHB ranked seventh out of 40 depository institutions (top 18 percent) with a deposit market share of 3 percent.

For home mortgage loans, BHB's market share of 0.3 percent ranked 66th out of 1,059 lenders (top 7 percent). The top three lenders were Rocket Mortgage with 7.6 percent market share, United Wholesale Mortgage with 4.1 percent market share, and Wells Fargo Bank, N.A. with 4 percent market share. Of the top 15 home mortgage lenders, 10 were NDFIs and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 0.6 percent ranked 23rd out of 224 lenders (top 11 percent). The top three lenders were American Express National Bank with 18.6 percent market share, Bank of America, N.A. with 14.3 percent market share, and JPMorgan Chase, N.A. with 13.7 percent market share. Of the top 10 small business lenders, eight were institutions with large business credit card portfolios with average loan sizes of \$23,000 or less. BHB's average loan size was \$62,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners generally placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of BHB's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders, including the significant operations of non-depository mortgage lenders.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans to moderate-income geographies was below the percentage of owner-occupied housing units in those geographies and near-to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. Included in this analysis were 137 PPP loans totaling \$9.9 million to small businesses located in low- or moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was weaker than the 2020 through 2021 performance. The percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing affordability for low-income families based on housing costs in relation to the median family incomes in the AA.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was near-to, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low-income and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 66 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 382 out of 441 PPP loans, totaling approximately \$28.3 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance

Community Development Lending

BHB was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 10 CD loans totaling over \$13.1 million, which represented 12.6 percent of allocated tier 1 capital. CD loans were impactful as they were responsive to an identified community need. By dollar volume, 92 percent funded revitalization and stabilization

efforts and 8 percent funded community services. This included six PPP loans totaling \$10.2 million that qualified as CD within the AA.

Examples of CD loans in the AA include:

- A \$1.9 million demand line of credit to a company that provided home restoration services for damage due to water, fire, wind, and natural disasters. The Federal Emergency Management Agency declared portions of southwestern and central Florida damaged by Hurricane Ian as Federal disaster areas. The increased and renewed line of credit supported revitalization of the AA by assisting in clean-up and rebuilding needs that helped retain existing residents.
- Renewed two \$400,000 lines of credit to an organization that provided support for school readiness programs for low- and moderate-income students. These programs helped children develop the skills needed to achieve future educational success, supported the role of the children's parents, and improved the quality of services available in the community.

Broader Statewide or Regional Areas

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional CD lending activities that did not have a purpose, mandate, or function to serve the AA. BHB made 10 CD loans totaling approximately \$130.1 million in the broader statewide and regional area. Six of the loans provided financing for affordable housing and four loans were for revitalization and stabilization efforts, which included one PPP loan.

Product Innovation and Flexibility

BHB made extensive use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 104 loans totaling over \$741,000 among the various flexible lending products available in the Sarasota MSA AA. This included one Home Possible loan totaling \$120,000, one HFA loan totaling over \$170,000, 65 Credit Builder loans totaling \$68,000, and 37 Special Purpose Credit Program loans totaling \$383,000. In addition, BHB facilitated the use of one DPA grant of \$5,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's overall performance in the Punta Gorda and Tampa MSAs, and the West Palm Beach MD AAs was consistent with BHB's overall performance under the Lending Test in the full-scope AA. BHB's performance in the Cape Coral MSA AA was good and in the Naples MSA AAs was adequate, which were weaker than BHB's overall performance under the Lending Test in the full-scope AA. The weaker performance in the Cape Coral MSA AA was due to lower geographic distributions and in the Naples MSA AA was due to both lower geographic and borrower distributions. Performance in the limited-scope areas supported the overall Lending Test conclusion for the state of Florida.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

BHB's performance under the Investment Test in Florida is rated Outstanding. Performance in the limited-scope AAs did not alter the overall Investment Test conclusion for the state of Florida.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Sarasota MSA AA was excellent.

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)
Full-Scope:										
Sarasota	7	7,532	16	4,132	23	28.0	11,663	38.5	6	2,148
Limited-Scope:										
Cape Coral	2	262	3	113	5	6.1	375	1.2	1	438
Naples	4	1,517	13	318	17	20.7	1,834	6.0	2	889
Punta Gorda	0	0	8	438	8	9.8	438	1.4	0	0
Tampa	2	2,361	6	1,035	8	9.8	3,396	11.2	3	183
West Palm Beach	2	733	8	85	10	12.2	818	2.7	1	1,513
Statewide/Regional										
Greater Florida	8	3,699	3	8,100	11	13.4	11,799	38.9	8	8,726
Total:	25	16,104	57	14,221	82	100.0	30,323	100.0	21	13,897
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. *** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.										

Sarasota

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 11.2 percent of tier 1 capital allocated to the AA. This did not include six unfunded commitments totaling \$2.1 million, an additional 2.1 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB made significant use of innovative and/or complex investments in LIHTC funds and SBICs to support CD initiatives. BHB had five qualified investments and grants totaling \$6.2 million related to economic development, four totaling \$4.8 million related to affordable housing, and 14 totaling \$678,469 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A \$4 million current-period investment and \$770,077 remaining in a prior-period investment in a two-investor LIHTC fund. The LIHTC supported a 96-unit affordable housing property in the MSA.
- Prior-period investments totaling \$6.1 million in three SBIC funds that supported economic development and job creation by investing in small businesses in the MSA.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AA. BHB had over \$11.8 million in 11 investments that benefited the broader statewide or regional area. BHB made seven investments related to economic development, two investments related to revitalization and stabilization, one investment related to affordable housing, and one investment related to community services to low- and moderate-income individuals. They also had eight broader statewide unfunded commitments totaling \$8.7 million. Unfunded investments included six related to economic development and two related to revitalization and stabilization. These investments supported the overall Investment Test conclusion for the state of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in the Tampa MSA and West Palm Beach MD AAs was consistent with BHB's overall performance under the Investment Test in the full-scope AA. BHB's performance in the Punta Gorda MSA AA was good and in the Cape Coral and Naples MSA AAs was adequate, which were weaker than BHB's overall performance in the full-scope AA. The weaker performances were due to lower volumes of qualified investments. Performance in the limited-scope AAs did not alter the overall Investment Test conclusion for the state of Florida.

SERVICE TEST

BHB's performance under the Service Test in Florida is rated High Satisfactory. Performance in the limited-scope areas did not alter the Service Test conclusion for the state of Florida.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Sarasota MSA AA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in BHB's AAs.

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA
Full-Scope:													
Sarasota	47.2	10	58.8	0.0	10.0	50.0	40.0	0.0	2.22	22.3	43.6	31.6	0.17
Limited-Scope:													
Cape Coral	5.2	1	5.9	0.0	0.0	100.0	0.0	0.0	2.3	23.7	46.7	26.4	0.84
Naples	22.8	2	11.7	0.0	0.0	0.0	100.0	0.0	7.1	21.8	40.2	29.8	1.2
Punta Gorda	3.7	1	5.9	0.0	0.0	100.0	0.0	0.0	0.0	16.5	66.7	16.8	0.0
Tampa	20.8	3	17.7	0.0	0.0	0.0	100.0	0.0	5.9	24.1	33.3	35.6	1.1
West Palm Beach	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	5.9	28.6	32.2	32.3	1.0
*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.													
**The NA category consists of geographies that have not been assigned an income classification.													
Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in moderate-income geographies was well below the percentage of the population living within those geographies. BHB did not have any branches in low-income geographies; however, only 2.2 percent of the population lives in those geographies. Examiners further considered four middle- or upper-income branches that were "across the street" from a moderate-income geography, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 11 ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 52.2 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was consistent usage from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closing							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA**
Full-Scope:							
Sarasota	0	0	0	0	0	0	0
Limited-Scope:							
Cape Coral	0	0	0	0	0	0	0
Naples	0	0	0	0	0	0	0
Punta Gorda	0	0	0	0	0	0	0
Tampa	0	0	0	0	0	0	0
West Palm Beach	0	0	0	0	0	0	0
*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							
**The NA category consists of geographies that have not been assigned an income classification.							

BHB did not open or close any branches in the Sarasota MSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had the same lobby hours of 9:00 a.m. to 5:00 pm, Monday through Friday. Nine of the 10 branch locations also had drive-thru facilities that were available from 9:00 a.m. to 5:00 pm, Monday through Friday.

BHB opened 286 SMART Money checking accounts and 65 Credit Builder accounts in the Sarasota MSA AA during the evaluation period.

Community Development Services

BHB provided an adequate level of CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, six bank employees conducted 28 financial education events totaling over 111 hours in coordination with four different organizations. Approximately 646 participants attended these events, which included banking basics, budgeting, credit scores and credit reporting, and identity theft prevention primarily targeted to low- and moderate-income individuals and families. Leadership was evident by two bank employees spending 85 hours participating on boards and committees for two different CD organizations.

An example of a CD service in the AA was a bank employee provided 82 hours serving as board chairperson and committee member of a community resource center that provided programs to aspiring and newly established entrepreneurs. The program provided information on licensing, financial literacy, market research and cash flow. The organization also provided programs on financial empowerment, improving money habits, career workshops, and legal programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in the Cape Coral, Naples, Punta Gorda, Tampa MSA and West Palm Beach MD AAs was good, which was weaker than BHB's overall performance under the Service Test in the full-scope AA. The weaker performances were due to lower branch distributions. Performance in the limited-scope AAs did not alter the overall Service Test conclusion for the state of Florida.

State of Illinois

CRA rating for the state of Illinois⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution and overall borrower distribution of originated and purchased home mortgage loans and small loans to businesses were good.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the State of Illinois

BHB delineated one AA in the state of Illinois, which was the entire Rockford, IL (Rockford) MSA. The state rating does not include the counties that were included in the Chicago MMSA AA or St. Louis MMSA AA analyses. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just under \$676.3 million in deposits in this AA, which represented 0.5 percent of BHB's total deposits. During the evaluation period, BHB made \$81.6 million or 0.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had seven office locations and 40 ATMs, of which 14 were deposit-taking, within the AA. BHB ranked sixth in deposit market share with 8.3 percent. The top four competitors had 54 percent of the market. These competitors included Illinois Bank & Trust with 5 branches and 17 percent market share, Midland States Bank with 11 branches and 14.5 percent market share, JPMorgan Chase Bank, N.A. with five branches and 12.5 percent market share, and Associated Bank, N.A. with six branches and 10 percent market share. There were 18 additional FDIC-insured depository institutions with 43 offices within BHB's AA.

Rockford MSA

The following tables provide a summary of the demographics, including housing and business information, for the Rockford MSA AA for each evaluation period.

⁵For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Table A – Demographic Information of the Assessment Area Assessment Area: Rockford MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	84	15.5	22.6	29.8	29.8	2.4
Population by Geography	344,290	10.8	19.6	31.3	38.1	0.3
Housing Units by Geography	145,688	11.4	20.0	30.8	37.2	0.6
Owner-Occupied Units by Geography	90,213	5.1	15.9	33.5	45.4	0.0
Occupied Rental Units by Geography	41,828	21.3	27.8	26.0	23.3	1.6
Vacant Units by Geography	13,647	22.2	23.2	27.0	26.0	1.6
Businesses by Geography	20,891	9.2	15.8	28.6	44.1	2.3
Farms by Geography	798	4.4	12.3	31.8	50.8	0.8
Family Distribution by Income Level	88,592	21.9	17.0	20.4	40.7	0.0
Household Distribution by Income Level	132,041	24.8	15.6	18.2	41.4	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$60,048	Median Housing Value			\$116,330
			Median Gross Rent			\$756
			Families Below Poverty Level			12.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Rockford MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	8.9	30.0	28.9	28.9	3.3
Population by Geography	338,798	5.7	26.1	33.4	33.6	1.1
Housing Units by Geography	145,782	6.8	27.3	32.7	31.8	1.4
Owner-Occupied Units by Geography	91,376	3.1	21.3	34.5	40.9	0.3
Occupied Rental Units by Geography	43,191	12.7	37.8	30.9	15.2	3.4
Vacant Units by Geography	11,215	14.3	36.2	24.5	21.5	3.6
Businesses by Geography	24,394	4.7	24.7	30.7	36.7	3.2
Farms by Geography	884	2.7	17.5	20.2	58.7	0.8
Family Distribution by Income Level	87,825	21.8	17.2	19.5	41.5	0.0
Household Distribution by Income Level	134,567	24.1	16.3	17.6	42.0	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$69,881	Median Housing Value			\$121,421
			Median Gross Rent			\$827
			Families Below Poverty Level			10.8%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the Rockford MMSA AA was \$116,330 in 2020-2021 and was \$121,421 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 35 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$30,024 or \$34,941 and moderate-income families earned less than \$48,038 or \$55,905. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$751 or \$874 for low-income borrowers and \$1,201 or \$1,398 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$624 or \$652. The cost of housing in the Rockford MSA AA would not appear to have been a significant barrier to low- or moderate-income borrowers.

Data from Moody's Analytics over the evaluation period indicated that the Rockford MMSA experienced job loss during the evaluation period. Manufacturing employment has been depressed due to declining demand for products from a top employer. Jobs in logistics, storage, and cargo will provide stability, but will not make up for losses in manufacturing. The Rockford area's workforce has been shrinking and was under-educated. The AA has experienced population decline for 12 straight years.

Based on data from the BLS, the unemployment rate in the Rockford MMSA was 7.5 percent in January 2020, as high as 22.3 percent in April 2020, and 4.6 percent in December 2022. Major employers in the AA included: Mercyhealth; Stellantis; SwedishAmerican Health System; United Parcel Service, Inc.; and OSF Healthcare.

Examiners reviewed information from two community contact interviews conducted during the evaluation period: one from an affordable housing organization and one from a Federal government agency. These sources identified the following needs within the community:

- Term loans and operating lines of credit to small businesses
- Low-cost farm financing
- Home purchase or home improvement loans or lines of credit for low- and moderate-income individuals
- Modifications of loans to low- and moderate-income borrowers that may be underwater

The Rockford MSA AA presented constrained opportunities to meet the identified needs. Examiners noted no certified CDFIs, one HUD-approved housing counseling agency, and one SBA Small Business Development center serving the AA.

Scope of Evaluation in the State of Illinois

Examiners conducted a full-scope review of Rockford MSA AA, which was the only AA in the state that was not part of an MMSA. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion. Small loans to businesses represented the majority of BHB's lending in the AA. BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

BHB's performance under the Lending Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Rockford MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Rockford	497	566	19	7	1,089	100	100
Total	497	566	19	7	1,089	100	100

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Rockford	47,450	32,640	1,510	17,237	98,837	100	100
Total	47,450	32,640	1,510	17,237	98,837	100	100

BHB ranked sixth out of 23 depository institutions (top 27 percent) with a deposit market share of 8.3 percent.

For home mortgage loans, BHB's market share of 1.1 percent ranked 23rd out of 364 lenders (top 7 percent). The top three lenders were U.S. Bank, N.A. with 9.5 percent market share, Blackhawk Bank with 7.8 percent market share, and Midwest Community Bank with 6.2 percent market share. Of the top 15 home mortgage lenders in this AA, five were NDFIs, one was a credit union, and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 3.2 percent ranked 10th out of 98 lenders (top 11 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 13.3 percent market share, American Express National Bank with 11.6 percent market share, and Illinois Bank & Trust with 9.2 percent market share. Of the top 10 small business lenders, six were institutions with large business credit card portfolios with average loan sizes of \$23,000 or less. BHB's average small business loan size was \$41,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners generally placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of BHB's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders and higher foreclosure rates in these areas.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was weaker than the 2020 through 2021 performance. The percentage of home mortgage loans in low-income geographies was significantly below, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies approximated, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders. Included in this analysis were 85 PPP loans totaling \$4.5 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered the significant increase in home values during the evaluation period, which limited the affordability for many low-income families.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans to low-income borrowers exceeded the percentage of those families in the AA.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and was below the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 63.1 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 278 out of 340 PPP loans, totaling approximately \$14.4 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made seven CD loans totaling over \$17.2 million, which represented 23 percent of allocated tier 1 capital. By dollar volume, 49.6 percent funded community

services, 40.8 percent funded revitalization and stabilization efforts, and 9.6 percent funded affordable housing that provided 70 units. This included four PPP loans totaling \$7 million that qualified as CD within the AA.

Examples of CD loans in the AA include:

- A renewed \$6 million line of credit to a nonprofit behavioral health services organization. The organization provided comprehensive addiction services for adolescents and adults, including prevention, intervention, detoxification, and inpatient and outpatient treatment. Over 75 percent of the organization's clientele received Medicaid or other publicly funded income.
- The refinancing of a \$1.7 million loan from a previous lender that provided affordable housing in the AA. The property consisted of nine buildings, six located in moderate-income geographies, containing 70 units that all had rents under the FFIEC's affordable limit for the AA.

Product Innovation and Flexibility

BHB made extensive use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 150 loans totaling \$3 million among the various flexible lending products available in the Rockford MSA AA. This included three Home Possible loans totaling \$419,310, 12 HFA loans totaling \$1.3 million, one FHA loan totaling over \$100,000, 79 Credit Builder loans totaling \$89,000, and 55 Special Purpose Credit Program loans totaling \$1.1 million. In addition, BHB facilitated the use of 11 DPA grants totaling \$55,000 and provided one BHB grant totaling \$3,000.

INVESTMENT TEST

BHB's performance under the Investment Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review BHB's performance in the Rockford MSA AA was excellent.

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)
Full-Scope:										
Rockford	11	9,038	16	5,651	27	60.0	14,688	92.7	2	936
Statewide/Regional										
Greater Illinois	10	596	8	561	18	40.0	1,157	7.3	0	0
Total	21	9,634	24	6,212	45	100.0	15,845	100.0	2	936
<p>*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>**Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>*** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p>										

Rockford MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 19.6 percent of tier 1 capital allocated to the AA. This did not include two unfunded commitments totaling \$935,675, an additional 1.3 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB occasionally used innovative and/or complex investments to support CD initiatives. BHB had four qualified investments and grants totaling \$8.3 million related to affordable housing, two totaling \$3.6 million related to economic development, and 21 totaling \$2.8 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A \$2.5 million investment in a SBIC that supported small businesses in the Rockford MSA AA. BHB's investment was allocated to a local pet food manufacturer located in a moderate-income geography with 150 full-time employees.
- A prior-period investment in a LIHTC fund with a current book value of \$2.5 million that was used to acquire and rehabilitate a multi-unit affordable housing complex. The property consisted of 175 affordable housing units designated for low- and moderate-income individuals and families and offered on-site daycare and computer classes for adults and youths.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AA. BHB had approximately \$1.2 million in 18 investments that benefited the broader statewide or regional area. All investments benefiting the greater Illinois area were related to community services to low- and moderate-income individuals. These investments support the overall Investment Test conclusion for the state of Illinois.

SERVICE TEST

BHB's performance under the Service Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Rockford MSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
Rockford	100.0	7	100.0	0	28.6	14.3	42.3	14.3	5.7	26.1	33.4	33.6	1.1
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. BHB did not have any branches in low-income geographies. Examiners further considered two middle- or upper-income branches that were "across the street" from a low- or moderate-income geography, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 40 ATMs in the AA, of which 14 were deposit-taking. BHB provided data that indicated 58.3 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was a 30.1 percent increase from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
Rockford	0	3	0	0	0	-1	-2
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, BHB's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB closed three branches, none of which were in low- or moderate-income geographies. The branch closures resulted from BHB reassessing its delivery services due to changes in usage.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had the same lobby hours and drive-thru hours of 9:00 a.m. to 5:00 pm, Monday through Friday, and from 9:00 a.m. to noon on Saturdays.

BHB opened 1,539 SMART Money checking accounts and 79 Credit Builder accounts in the Rockford MSA AA during the evaluation period.

Community Development Services

BHB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, three bank employees conducted 13 financial education events totaling 27 hours in coordination with six different organizations. Approximately 298 participants attended these classes which included personal finances, steps to homeownership, and assistance for small businesses. Leadership was evident by two bank employees who spent 242 hours participating on boards and committees for two different CD organizations. Additionally, one employee provided four hours of general qualified volunteer activities.

Examples of CD services in the AA include:

- A bank employee was a board member of a community services organization that provided hot meals, basic life skills, mentoring, and other activities to children from low-income families.
- A bank employee was vice-president and treasurer of the local chapter of a nationwide community service organization that provided programs related to health and life skills, character and leadership, sports and fitness, and the arts, to low- and moderate-income students.

State of Indiana

CRA rating for the state of Indiana⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution and overall borrower distribution of originated and purchased home mortgage loans, small loans to businesses, and small loans to farms were good.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.
- BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Institution's Operations in the State of Indiana

BHB delineated three AAs in the state of Indiana. They included portions of the Indianapolis-Carmel-Anderson, IN (Indianapolis) MSA; the entire Kokomo, IN (Kokomo) MSA; and three Non-MSA (Non-MSA Indiana) counties. Examiners combined the Non-MSA counties into one AA for analysis and presentation. The state of Indiana rating does not include the counties included in the Chicago MMSA AA analysis. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just over \$4.4 billion in deposits in these AAs, which represented 3.3 percent of BHB's total deposits. During the evaluation period, BHB made \$656.6 million or 5.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 41 office locations and 47 ATMs, of which 45 were deposit-taking, within these AAs. BHB ranked sixth in deposit market share with 5.4 percent. The top four competitors had 52.2 percent of the market. These competitors included JPMorgan Chase Bank, N.A. with 60 branches and 21.5 percent market share, PNC Bank, N.A. with 47 branches and 13.6 percent market share, Merchants Bank of Indiana with four branches and 9.9 percent market share, and Fifth Third Bank, N.A. with 35 branches and 7.2 percent market share. There were 41 additional FDIC-insured depository institutions with 313 offices within BHB's AAs.

⁶For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Indianapolis MSA

The following tables provide a summary of the demographics, including housing and business information, for the Indianapolis MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Indianapolis MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	366	18.0	27.9	30.1	23.5	0.5
Population by Geography	1,782,244	11.7	23.5	31.1	33.3	0.3
Housing Units by Geography	759,996	13.4	25.7	30.2	30.5	0.2
Owner-Occupied Units by Geography	436,043	6.8	18.1	35.1	39.9	0.1
Occupied Rental Units by Geography	243,497	20.4	36.6	24.2	18.5	0.2
Vacant Units by Geography	80,456	28.3	33.7	21.4	16.2	0.4
Businesses by Geography	216,681	11.4	21.1	29.4	37.8	0.2
Farms by Geography	5,567	7.0	15.3	42.5	35.1	0.1
Family Distribution by Income Level	438,839	22.3	17.3	19.3	41.1	0.0
Household Distribution by Income Level	679,540	24.1	16.4	17.7	41.9	0.0
Median Family Income MSA – 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$143,918
			Median Gross Rent			\$830
			Families Below Poverty Level			11.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Indianapolis MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	436	13.3	24.8	35.1	24.8	2.1
Population by Geography	1,933,944	9.0	21.8	36.9	30.9	1.5
Housing Units by Geography	794,086	10.6	23.1	36.7	28.2	1.4
Owner-Occupied Units by Geography	466,555	5.2	17.0	40.6	36.2	0.9
Occupied Rental Units by Geography	255,943	17.2	31.8	31.5	17.4	2.1
Vacant Units by Geography	71,588	22.1	32.0	29.0	14.9	2.0
Businesses by Geography	263,486	8.6	19.9	34.3	34.0	3.2
Farms by Geography	6,377	6.2	16.7	45.4	30.4	1.2
Family Distribution by Income Level	456,928	21.0	17.8	20.5	40.8	0.0
Household Distribution by Income Level	722,498	23.5	16.5	18.4	41.6	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Indianapolis MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA – 26900 Indianapolis-Carmel-Anderson, IN MSA		\$80,981	Median Housing Value			\$179,781
			Median Gross Rent			\$963
			Families Below Poverty Level			8.1%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The Indianapolis MSA AA consisted of seven of the 11 counties in the Indianapolis MSA. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 3 percent of total bank deposits.

BHB operated 35 branches in the AA and had a 5.3 percent deposit market share, which ranked sixth among all institutions. Competition was significant with 38 other FDIC-insured depository institutions operating 415 offices in the AA. The top three competitors included JPMorgan Chase Bank, N.A. with 58 branches and 22.7 percent market share, PNC Bank, N.A. with 45 branches and 14.3 percent market share, and Merchant's Bank of Indiana with three branches and 8.4 percent market share.

The median housing value of owner-occupied housing units for the Indianapolis MMSA AA was \$143,918 in 2020-2021 and was \$179,781 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 37.6 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$33,402 or \$40,491 and moderate-income families earned less than \$53,442 or \$64,785. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$835 or \$1,012 for low-income borrowers and \$1,336 or \$1,620 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$773 or \$965. The cost of housing in the Indianapolis MSA AA would not appear to have been a significant barrier to low- or moderate-income borrowers.

Data from Moody's Analytics over the evaluation period indicated that the Indianapolis MMSA experienced steady job growth since the pandemic spike in unemployment in the spring of 2020. Hiring in logistics, office-using industries, manufacturing, and pharmaceutical industries played a key role in job growth. The strong logistics infrastructure and central location within the state boosted economic recovery and job growth for the MMSA.

Based on data from the BLS, the unemployment rate in the Indianapolis MMSA AA was 3.3 percent in January 2020, as high as 12.7 percent in April 2020, and 2.3 percent in December 2022. Major employers in the AA included: Indiana University Health; St. Vincent Hospitals & Health Services; Community Health Network; Eli Lilly and Co.; Walmart Inc.; The Kroger Co.; FedEx; Amazon; Anthem; Eskenazi Health; Meijer; Roche Diagnostic Corp.; Purdue University; Defense Finance & Accounting; and St. Francis Hospital & Health Center.

Examiners reviewed local area community action plans and two community contact interviews conducted during the evaluation period, one from a small business development organization and one with a certified SBA Community Advantage lender. These sources identified the following needs within the community:

- Funding for a variety of affordable housing types
- Loans for rehabilitation and repair of existing housing
- Small business funding programs
- Support for new and existing small business entrepreneurs
- Investment in infrastructure, including public safety

The Indianapolis MSA AA offered ample opportunities to meet the identified needs. Numerous nonprofit organizations engage in affordable housing and economic development endeavors and provide community services targeted to low- and moderate-income persons and geographies. Examiners noted at least 10 certified CDFIs, nine HUD-approved housing counseling agencies, and two SBA Small Business Development centers in the AA.

Scope of Evaluation in the State of Indiana

Examiners selected the Indianapolis MSA AA for analysis using full-scope procedures and weighted it most heavily in the overall conclusions. The Indianapolis MSA AA had most deposits among the three AAs with 92.3 percent. BHB was ranked sixth out of 39 institutions in the AA with a market share of 5.3 percent. Examiners analyzed the Kokomo MSA and the Non-MSA Indiana AAs using limited-scope procedures. Examiners based the ratings on the results of the AA that received the full-scope review and BHB's performance in the limited-scope AAs, as applicable.

In each AA, examiners placed more emphasis on the lending product that had the highest percentage of loans. In the Indianapolis MSA AA, examiners weighted small loans to businesses more heavily. In the Kokomo MSA AA, home mortgage loans received more weight. In the Non-MSA Indiana AA, examiners weighted home mortgage loans and small loans to businesses equally. Small loans to farms received the least weight in all AAs as farm lending was not a primary focus for BHB.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

BHB's performance under the Lending Test in Indiana is rated Outstanding. Performance in the limited-scope AAs did not alter the overall Lending Test conclusion for the state of Indiana.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Indianapolis MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Indianapolis	2,320	3,424	44	52	5,840	92.3	92.3
Limited-Scope:							
Kokomo	176	123	3	0	302	4.8	5.2
Non-MSA Indiana	72	72	38	0	182	2.9	2.5
Total	2,568	3,619	85	52	6,324	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Indianapolis	327,308	292,427	1,954	254,357	876,046	95.4	92.3
Limited-Scope:							
Kokomo	15,067	6,776	91	0	21,933	2.9	5.2
Non-MSA Indiana	5,681	6,304	1,003	0	12,988	1.7	2.5
Total	348,056	305,506	3,048	254,357	910,967	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

BHB ranked sixth out of 39 depository institutions (top 16 percent) with a deposit market share of 5.3 percent.

For home mortgage loans, BHB's market share of 0.7 percent ranked 37th out of 677 lenders (top 6 percent). The top three lenders were Caliber Home Loans, Inc. with 5.7 percent market share, Rocket Mortgage with 5.4 percent market share, and JPMorgan Chase Bank, N.A. with 3.8 percent market share. Of the top 15 lenders, nine were NDFIs and two were credit unions.

For small loans to businesses, BHB's market share of 3.1 percent ranked ninth out of 190 lenders (top 5 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 18.5 percent market share, American Express National Bank with 14.7 percent market share, and Capital One Bank (USA), N.A. with 5.1 percent market share. Of the top eight small business loan lenders, six were institutions with large business credit card portfolios with average loan sizes of \$22,000 or less. BHB's average small business loan size was \$64,000.

For small loans to farms, BHB's market share of 3.9 percent ranked eighth out of 35 lenders (top 23 percent). The top three lenders were John Deere Financial, FSB with 17.1 percent market share, JPMorgan Chase Bank, N.A. with 13.1 percent market share, and First Merchants Bank with 11.8 percent market share.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to Table O in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of BHB's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders and the low inventory of purchasable homes in low- and moderate-income geographies.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies was below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was below the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was weaker than the 2020 through 2021 performance. The percentage of home mortgage loans in low-income geographies was significantly below, and in moderate-income geographies was well below, both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies was below the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies approximated, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders. Included in this analysis were 445 PPP loans totaling \$28 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in those geographies.

Small Loans to Farms

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

The geographic distribution of small loans to farms was adequate. Examiners considered the low number of farms in low-income geographies and that small farm lending was not a primary focus for BHB.

For 2020 through 2021, BHB did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms originated or purchased in moderate-income

geographies was well below the percentage of farms located in those geographies but exceeded the aggregate percentage of all reporting lenders. Included in this analysis were two PPP loans that totaled \$39,000 to small farms located in low- or moderate-income geographies that provided support during the COVID-19 pandemic.

In 2022, BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans to low-income borrowers was near-to the percentage of those families in the AA.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and was below the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 49.4 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that 1,349 out of 1,845 PPP loans, totaling approximately \$92.7 million, were made to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on our conclusion.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of small loans to businesses was below the percentage of small businesses in the AA.

Small Loans to Farms

Refer to Table T in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was adequate. Examiners considered that small farm lending was not a primary focus for BHB.

For 2020 through 2021, the percentage of loans to small farms originated or purchased was well below both the percentage of small farms in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 49.4 percent of its small loans to farms, including PPP loans. Examiners considered the fact that 17 out of 24 PPP loans, totaling approximately \$92.7 million, were made to farms with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on our conclusion.

In 2022, BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made 52 CD loans totaling over \$254.4 million, which represented 56.6 percent of allocated tier 1 capital. BHB utilized complex CD loans, often in a leadership position. CD loans were impactful and responsive to identified community needs. By dollar volume, 68.6 percent funded revitalization and stabilization efforts, 18.9 percent funded affordable housing that provided 620 units, 10.3 percent funded economic development activities, and 2.1 percent funded community services. This included 30 PPP loans totaling \$95.9 million that qualified as CD within the AA. Examiners also considered the impact of strong and increasing competition for CD loans in this AA. During the evaluation period, BHB submitted proposals on two CD transactions totaling \$11.5 million that were lost to other lenders.

Examples of CD loans in the AA include:

- An \$8.8 million loan for the construction of a LIHTC affordable housing development. The housing project featured 36 units restricted to individuals and families earning 60 percent or less of the area

median income and included an office space for a nonprofit offering case management service. This loan was part of a complex financing package consisting of multiple sources.

- A \$4.1 million SBA 504 loan to finance the expansion of a small business' headquarters location in a moderate-income geography. The borrower was a real estate holding company for a small manufacturing firm with 48 employees.
- A \$2.2 million loan for the construction of a new fast-food restaurant creating jobs for low- and moderate-income individuals. The restaurant was built in a moderate-income geography and created 45 new jobs.

Product Innovation and Flexibility

BHB used innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 564 loans totaling \$11.7 million among the various flexible lending products available in the Indianapolis MSA AA. This included 27 Home Possible loans totaling \$3.6 million, 10 FHA loans totaling \$1.8 million, 16 HFA loans totaling \$2.4 million, seven NHLP loans totaling \$855,850, 340 Credit Builder loans totaling \$412,251, and 164 Special Purpose Credit Program loans totaling \$2.6 million. Of the loans made during the evaluation period, BHB facilitated the use of 24 DPAs totaling \$120,000 and provided 15 BHB grants totaling \$45,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in the Kokomo, IN MSA was good and the Non-MSA Indiana AAs was adequate, which was weaker than BHB's overall performance under the Lending Test in the full-scope AA. The weaker performance in the Kokomo MSA AA was due to a lower level of CD lending. The weaker performance in the Non-MSA Indiana AA was due to lower geographic distributions and lower levels of CD lending. Performance in the limited-scope AAs did not alter the overall Lending Test conclusion for the state of Indiana.

Refer to Tables O through T in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

BHB's performance under the Investment Test in Indiana is rated Outstanding. Performance in the limited-scope AAs did not alter the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Indianapolis MSA AA was excellent.

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)
Full-Scope:										
Indianapolis	17	10,224	47	34,616	64	55.2	44,840	54.4	8	27,553
Limited-Scope:										
Kokomo	2	898	13	1,495	15	12.9	2,393	2.9	2	102
Non-MSA Indiana	0	0	1	550	1	0.9	550	0.7	0	0
Statewide/Regional										
Greater Indiana	14	22,324	22	12,259	36	31.0	34,583	42.0	4	1,579
Total	33	33,446	83	48,920	116	100.0	82,366	100.0	14	29,234
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. **Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. *** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.										

Indianapolis MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 10 percent of tier 1 capital allocated to the AA. This did not include eight unfunded commitments totaling \$27.6 million, an additional 6.1 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB made significant use of innovative and/or complex investments in SBICs and LIHTC funds to support CD initiatives. BHB had 10 qualified investments and grants totaling \$25 million related to affordable housing, three totaling \$13.7 million related to economic development, 44 totaling \$5.4 million to community service organizations that provided needed services to low- and moderate-income individuals, and seven totaling \$728,202 for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- Three investments totaling \$13.7 million in SBIC funds that supported economic development and job creation by investing in small businesses in the AA. One of the SBIC funds was the only active Indiana-based SBIC fund and was managed by an entity headquartered in Indianapolis.
- A \$17.5 million investment in a multi-investor LIHTC fund to acquire equity interests in affordable housing projects. The funds were allocated toward three projects that included 82 units located in low- and moderate-income geographies that were restricted to residents earning 60 percent or less of the area median income. BHB also originated \$18.1 million in community development loans related to these three projects.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AA. BHB had \$34.6 million in 36 investments that benefited the broader statewide or regional area. BHB made 31 investments related to community services for low- and moderate-income individuals, two related to affordable housing, and three related to economic development activities. These investments supported the overall Investment Test conclusion for the state of Indiana.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in both the Kokomo, IN MSA and the Non-MSA Indiana AAs was good, which was weaker than BHB's overall performance under the Investment Test in the full-scope AA. In the Kokomo MSA AA, the weaker performance was due to current-period investments that were not as responsive to community needs. In the Non-MSA Indiana AA, the weaker performance was due to a lower volume of qualified investments. Performance in the limited-scope AAs did not alter the overall Investment Test conclusion for the state of Indiana.

SERVICE TEST

BHB's performance under the Service Test in Indiana is rated Outstanding. Performance in the limited-scope areas supported the overall Service Test conclusion for the state of Indiana.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Indianapolis MSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA
Full-Scope:													
Indianapolis	92.3	35	85.4	2.9	22.9	42.9	31.4	0.0	9.0	21.8	36.9	30.9	1.5
Limited-Scope:													
Kokomo	5.2	4	9.8	0.0	50.0	50.0	0.0	0.0	4.3	21.6	40.8	33.4	0.0
Non-MSA Indiana	2.5	2	4.9	0.0	0.0	100.0	0.0	0.0	8.0	11.9	59.2	21.2	0.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.													
**The NA category consists of geographies that have not been assigned an income classification.													
Due to rounding, totals may not equal 100.0 percent.													

BHB's distribution of branches in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners further considered seven middle- or upper-income branches, three that were "across the street" from a low- or moderate-income geography and four that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 38 ATMs in the AA, of which 36 were deposit-taking. BHB provided data that indicated 58.9 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 17.5 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA**
Full-Scope:							
Indianapolis	0	1	0	0	-1	0	0
Limited-Scope:							
Kokomo	0	0	0	0	0	0	0
Non-MSA Indiana	0	0	0	0	0	0	0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. **The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, BHB's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB closed one branch, which was not located in a low- or moderate-income geography. The branch closure resulted from BHB reassessing its delivery services due to changes in usage.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had the same lobby hours and drive-thru hours, 9:00 a.m. to 5:00 p.m. Monday through Friday. There were 26 branches open 9:00 a.m. to noon on Saturdays. Of the nine branches not open on Saturdays, only one was in a moderate-income geography.

BHB opened 3,192 SMART Money checking accounts and 340 Credit Builder accounts in the Indianapolis AA during the evaluation period.

Community Development Services

BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, 31 bank employees conducted 78 financial education events totaling almost 300 hours in coordination with 40 different organizations. Approximately 2,402 participants attended these classes. These events included financial literacy, financial wellness, and first-

time homebuyers' programs for low- and moderate-income individuals. Leadership was evident by five bank employees spending over 441 hours participating on boards and committees for six different CD organizations. Additionally, 14 employees provided 157 hours of general qualified volunteer activities.

Examples of CD Services in the AA include:

- A branch manager provided over 178 hours serving as a board member of a human service nonprofit organization. The organization provided low- and moderate-income individuals and families with residential housing, case management, childcare, job placement, rent and utility assistance, and transportation assistance.
- A senior level bank employee provided 144 hours serving as board president of a neighborhood social services and community development organization. Services include general and financial education, career coaching and development, and tax preparation services for adults; after school and summer programs for youths; housing and rental assistance; health and welfare programs for low- and moderate-income individuals and families; and community development initiatives for businesses in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, BHB's performance in the Kokomo MSA AA was consistent with BHB's overall performance under the Service Test in the full-scope AA. BHB's performance in the Non-MSA Indiana AA was adequate, which was weaker than BHB's overall performance under the Service Test in the full-scope AA. The weaker performance was due to lower branch distributions. Performance in the limited-scope areas supported the overall Service Test conclusion for the state of Indiana.

State of Kansas

CRA rating for the state of Kansas⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution of originated and purchased small loans to businesses was excellent and overall borrower distribution was adequate.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the State of Kansas

BHB delineated one county in the state of Kansas (Non-MSA Kansas) as an AA. The state rating does not include the counties included in the Kansas City MMSA AA analysis. Refer to the table in appendix A for the county reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just over \$48.7 million in deposits in this AA, which represented 0.04 percent of BHB's total deposits. During the evaluation period, BHB made almost \$3.4 million or 0.03 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had a limited presence in this AA with one office location, one stand-alone drive-thru facility, and three ATMs, all of which were deposit-taking. BHB ranked sixth in deposit market share with 4.8 percent. The top four competitors had 74.9 percent of the market. These competitors included GNB Bank, N.A. with four branches and 26.8 percent market share, Community National Bank & Trust with four branches and 17.6 percent market share, Commerce Bank with one branch and 17.3 percent market share, and Labette Bank with four branches and 13.2 percent market share. There were six additional FDIC-insured depository institutions with eight offices within BHB's AA.

Non-MSA Kansas

The following tables provide a summary of the demographics, including housing and business information, for the Non-MSA Kansas AA for each evaluation period.

⁷For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Table A – Demographic Information of the Assessment Area Assessment Area: Non-MSA Kansas – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	72.7	9.1	0.0
Population by Geography	39,304	0.0	11.6	69.0	19.4	0.0
Housing Units by Geography	17,864	0.0	12.7	69.9	17.4	0.0
Owner-Occupied Units by Geography	9,203	0.0	8.8	78.8	12.4	0.0
Occupied Rental Units by Geography	5,862	0.0	16.8	57.7	25.5	0.0
Vacant Units by Geography	2,799	0.0	16.9	66.2	16.9	0.0
Businesses by Geography	2,509	0.0	24.2	59.9	15.9	0.0
Farms by Geography	167	0.0	5.4	85.0	9.6	0.0
Family Distribution by Income Level	8,729	22.2	17.3	22.9	37.6	0.0
Household Distribution by Income Level	15,065	30.7	18.9	16.2	34.3	0.0
Median Family Income Non-MSA – Kansas		\$57,229	Median Housing Value			\$92,561
			Median Gross Rent			\$656
			Families Below Poverty Level			13.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Non-MSA Kansas – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	41.7	58.3	0.0	0.0
Population by Geography	38,972	0.0	36.4	63.6	0.0	0.0
Housing Units by Geography	18,182	0.0	36.0	64.0	0.0	0.0
Owner-Occupied Units by Geography	9,340	0.0	26.6	73.4	0.0	0.0
Occupied Rental Units by Geography	6,263	0.0	50.6	49.4	0.0	0.0
Vacant Units by Geography	2,579	0.0	34.5	65.5	0.0	0.0
Businesses by Geography	2,567	0.0	44.0	56.0	0.0	0.0
Farms by Geography	171	0.0	21.6	78.4	0.0	0.0
Family Distribution by Income Level	9,581	26.4	20.2	17.3	36.0	0.0
Household Distribution by Income Level	15,603	31.4	17.0	17.8	33.7	0.0
Median Family Income Non-MSA – Kansas		\$65,467	Median Housing Value			\$96,035
			Median Gross Rent			\$720
			Families Below Poverty Level			12.8%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the Non-MSA Kansas AA was \$92,561 in 2020-2021 and was \$96,035 in 2022. In addition, the FHFA HPI calculator indicated housing values in the state of Kansas increased approximately 34 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$28,615 or \$32,734 and moderate-income families earned less than \$45,783 or \$52,375. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$715 or \$818 for low-income borrowers and \$1,145 or \$1,309 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the non-MSA median housing value would have been \$497 or \$516. The cost of housing in the Non-MSA Kansas AA would not appear to have been a significant barrier to many low- or moderate-income borrowers.

Data from Moody's Analytics over the evaluation period indicated that the Kansas economy was struggling during 2020 and 2021, with weak payroll employment in all sectors of the economy. During late 2021 and into 2022, labor market conditions improved. Transportation and warehousing payrolls increased, offsetting lower gains in the rest of the service sector. Housing leveled off in 2022 following a strong upturn in new construction and house prices earlier in the evaluation period. The house price appreciation moderated as rising interest rates dampened demand but growth remained elevated. Income gains did not keep up, so affordability plummeted to a decade low.

Based on data from the BLS, the unemployment rate in Crawford County, Kansas was 4 percent in January 2020, as high as 9.5 percent in April 2020, and 2.6 percent in December 2022. Major employers in the AA included: Pittsburg State University Foundation; C. R. England, Inc.; Via Christi Health, Inc.; Ascension; Crawford County; U.S. Xpress, Inc.; CRST International, Inc.; Dollar General Corp.; USA Truck, Inc.; Watco Companies, Inc.; Pitsco Inc.; SEK Interlocal 637; NPC International, Inc.; USD 244; and Walmart, Inc.

Examiners reviewed information from one community contact interview conducted during the evaluation period with a local nonprofit affordable housing agency. This source identified the following needs within the AA:

- Affordable housing, including supportive housing for those recovering from or living with addiction or mental disorders
- Economic development loans to promote local entrepreneurship to attract jobs and investment
- Investment in community infrastructure

The Non-MSA Kansas AA presented constrained opportunities to meet the identified needs. There were few non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted no certified CDFIs, no HUD-approved housing counseling agencies, and only one SBA Small Business Development center serving the AA.

Scope of Evaluation in the State of Kansas

Examiners conducted a full-scope review of the Non-MSA Kansas AA, which was the only AA in the state that was not part of an MMSA.

Examiners placed more emphasize on small loans to businesses in arriving at the overall conclusion as small business loans represented the majority of BHB's lending in the AA. BHB did not originate or purchase a sufficient volume of home mortgage loans or small loans to farms to perform a meaningful analysis. Examiners also considered BHB's limited branch presence and staffing in this AA when reaching conclusions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

BHB's performance under the Lending Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in Non-MSA Kansas AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Non-MSA Kansas	17	21	0	1	39	100	100
Total	17	21	0	1	39	100	100

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
Non-MSA Kansas	1,988	1,362	0	4,094	7,444	100	100
Total	1,988	1,362	0	4,094	7,444	100	100

BHB ranked sixth out of 11 depository institutions (top 55 percent) with a deposit market share of 4.8 percent.

For small loans to businesses, BHB's market share of 2 percent ranked 11th out of 45 lenders (top 25 percent). The top three lenders were Equity Bank with 20.4 percent market share, Commerce Bank with 11.7 percent market share, and American Express National Bank with 9.9 percent market share. Of the top 10 small business lenders, seven were institutions with large business credit card portfolios with average loan sizes of \$14,000 or less. BHB's average small business loan size was \$51,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited excellent geographic distribution of loans in its AA. Examiners based conclusions on BHB's performance in moderate-income geographies as there were no low-income geographies in the AA.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. Included in this analysis were nine PPP loans totaling \$183,000 to small businesses located in middle-income geographies that provided support during the COVID-19 pandemic.

In 2022, BHB did not originate or purchase a sufficient volume of small business loans to perform a meaningful analysis.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited an adequate distribution of loans among businesses of different sizes.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 57.9 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 13 out of 19 PPP loans, totaling approximately \$1.3 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

In 2022, BHB did not originate or purchase a sufficient volume of small business loans to perform a meaningful analysis.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. BHB made one CD loan totaling \$4.1 million, which represented 76 percent of allocated tier 1 capital. The CD loan was responsive to identified community needs by funding revitalization and stabilization efforts. This loan was a PPP loan to a local small business assisting in the retention of 409 jobs to low- and moderate-income individuals.

Product Innovation and Flexibility

BHB made limited use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made two loans totaling \$11,000 among the various flexible lending products available in the state of Kansas. This included one Credit Builder loan totaling \$1,000 and one Special Purpose Credit Program loan totaling \$10,000.

INVESTMENT TEST

BHB's performance under the Investment Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in Non-MSA Kansas AA was excellent.

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)
Full-Scope:										
Non-MSA Kansas	0	0	1	500	1	11.1	500	25.4	0	0
Statewide/Regional										
Greater Kansas	2	286	6	1,184	8	88.9	1,469	74.6	1	241
Total	2	286	7	1,684	9	100.0	1,969	100.0	1	241
<small>* 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.</small>										

Non-MSA Kansas

BHB had an excellent level of qualified CD investments and grants, though rarely in a leadership position given previously mentioned intense market competition and limited investment opportunities. The dollar volume of current- and prior-period investments represented 9.3 percent of tier 1 capital allocated to the AA.

BHB exhibited excellent responsiveness to community credit and economic development needs when considering the limited investment opportunities and strong market competition in the AA. As noted, the Non MSA AA presented constrained opportunities to meet identified community needs. BHB

occasionally used innovative and/or complex investments to support CD initiatives. BHB had one qualified investment totaling \$500,000 in an SBA loan fund that provided financial assistance to small businesses in the AA. The fund was a certified Community Development Entity that promoted permanent job creation, retention, or improvement of low- and moderate-income areas or for low-or moderate-income persons who are employed by small businesses.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AA. BHB made eight investments totaling \$1.5 million that benefited the broader statewide or regional area. BHB made one investment related to economic development, and seven related to community services targeted to low- and moderate-income individuals. These investments supported the overall Investment Test conclusion for the state of Kansas.

SERVICE TEST

BHB's performance under the Service Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the Non-MSA Kansas AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
Non-MSA Kansas	100.0	2	100.0	0.0	100.0	0.0	0.0	0.0	0.0	36.4	63.6	0.0	0.0
**The NA category consists of geographies that have not been assigned an income classification.													

BHB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no low-income geographies within the AA.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had three ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 44.7 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 70.6 percent from fourth quarter 2019. These systems

provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
Non-MSA Kansas	0	0	0	0	0	0	0
*The NA category consists of geographies that have not been assigned an income classification.							

BHB did not open or close any branches in the Non-MSA Kansas AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The branches were open 9:00 a.m. to 5:00 p.m. Monday through Friday, with the drive-thru open Saturday from 9:00 a.m. to noon.

BHB opened 67 SMART Money checking accounts and one Credit Builder accounts in the Non-MSA Kansas AA during the evaluation period.

Community Development Services

BHB provided an adequate level of CD services, consistent with its capacity and expertise to conduct these activities. Examiners considered the limited number of personnel and opportunities to provide services. A bank employee delivered two homebuyer seminars totaling three hours to 145 participants. Leadership was evident by a bank employee spending 72 hours as a board member of two local nonprofit organizations that provided grants to organization and entities that provide services to low- and moderate-income individuals or geographies. In addition, one employee provided three hours of general qualified volunteer activities.

State of Missouri

CRA rating for the state of Missouri⁸: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution of originated and purchased small loans to businesses was poor and overall borrower distribution was good.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the State of Missouri

BHB delineated one AA in the state of Missouri. It included two counties in the Missouri portion of the St. Joseph, MO-KS (St. Joseph) MMSA. The state of Missouri rating does not include the counties included in the Kansas City MMSA AA or St. Louis MMSA AA analyses. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just over \$44 million in deposits in this AA, which represented 0.03 percent of BHB's total deposits. During the evaluation period, BHB made almost \$4.4 million or 0.03 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had a limited presence in this AA with one office location and one ATM, which was deposit-taking. BHB ranked 10th in deposit market share with 1.8 percent. The top three competitors had 63.6 percent of the market. These competitors included The Nodaway Valley Bank with five branches and 30.1 percent market share, Commerce Bank with three branches and 20.3 percent market share, and U.S. Bank, N.A. with four branches and 13.2 percent market share. There were 11 additional FDIC-insured depository institutions with 19 offices within BHB's AA.

St. Joseph MMSA

The following tables provide a summary of the demographics, including housing and business information, for the St. Joseph MMSA AA for each evaluation period.

⁸For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Table A – Demographic Information of the Assessment Area Assessment Area: St Joseph MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.4	24.1	51.7	20.7	0.0
Population by Geography	106,889	1.6	22.4	49.3	26.7	0.0
Housing Units by Geography	45,790	2.4	23.8	50.9	22.9	0.0
Owner-Occupied Units by Geography	26,424	0.7	18.2	52.7	28.4	0.0
Occupied Rental Units by Geography	13,560	4.8	27.2	50.5	17.5	0.0
Vacant Units by Geography	5,806	4.3	41.4	43.8	10.5	0.0
Businesses by Geography	6,246	6.5	15.5	44.5	33.5	0.0
Farms by Geography	345	0.9	4.6	64.1	30.4	0.0
Family Distribution by Income Level	25,752	21.0	17.6	22.8	38.5	0.0
Household Distribution by Income Level	39,984	24.8	15.8	17.3	42.1	0.0
Median Family Income MSA - 41140 St. Joseph, MO-KS MSA		\$59,820	Median Housing Value			\$117,642
			Median Gross Rent			\$704
			Families Below Poverty Level			12.5%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: St Joseph MMSA - 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	6.5	19.4	64.5	9.7	0.0
Population by Geography	102,928	5.4	14.9	65.6	14.1	0.0
Housing Units by Geography	46,159	6.2	16.6	65.0	12.2	0.0
Owner-Occupied Units by Geography	26,222	3.0	13.8	67.5	15.7	0.0
Occupied Rental Units by Geography	14,219	9.4	19.5	62.6	8.5	0.0
Vacant Units by Geography	5,718	13.0	21.9	59.5	5.6	0.0
Businesses by Geography	9,522	5.3	8.9	70.6	15.2	0.0
Farms by Geography	512	1.6	3.3	79.7	15.4	0.0
Family Distribution by Income Level	25,014	19.7	19.2	20.4	40.6	0.0
Household Distribution by Income Level	40,441	25.1	15.8	18.1	40.9	0.0
Median Family Income MSA - 41140 St. Joseph, MO-KS MSA		\$66,409	Median Housing Value			\$130,938
			Median Gross Rent			\$785
			Families Below Poverty Level			9.8%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The median housing value of owner-occupied housing units for the St. Joseph MMSA AA was \$117,642 in 2020-2021 and was \$130,938 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 33.5 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$29,910 or \$33,205 and moderate-income families earned less than \$47,856 or \$53,127. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$748 or \$830 for low-income borrowers and \$1,196 or \$1,328 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$632 or \$703. The cost of housing in the St. Joseph MMSA AA would not appear to have been a significant barrier to low- or moderate-income borrowers.

Data from Moody's Analytics over the evaluation period indicated that the St. Joseph MMSA AA had fully recouped pandemic-induced job losses ahead of the state and nation. Service-providing industries also steadily recovered jobs. At the end of the evaluation period, unemployment was below the pre-pandemic rate.

Based on data from the BLS, the unemployment rate in the St. Joseph MMSA AA was 3.4 percent in January 2020, as high as 7.6 percent in April 2022, and 2 percent in December 2022. Major employers in the AA included: Mosaic Life Care; Triumph Foods Inc.; 139th Airlift Wing, Missouri Air National Guard; Boehringer Ingelheim Corp.; System Services Technologies Inc.; Altec Industries; Walmart Inc.; The Hillshire Brands Co.; Tyson Foods; Johnson Controls; and American Family Insurance.

Examiners reviewed information from three community contact interviews conducted during the evaluation period: one from a social services agency, one from an economic development agency, and one from a farming industry organization. These sources identified the following needs within the community:

- Affordable rental properties that are well managed and maintained
- Loans to small businesses with 25 to 500 employees for commercial real estate and working capital
- Consumer loans for home mortgages and vehicle financing
- Business loans for farm operations and projects for speculative commercial buildings
- Financial literacy classes at local schools
- Community development loans for workforce development through increased technical education with a manufacturing focus

The St. Joseph MMSA AA presented constrained opportunities to meet the identified needs. Examiners noted no certified CDFIs, no HUD-approved housing counseling agencies, and only one SBA Small Business Development center serving the AA.

Scope of Evaluation in the State of Missouri

Examiners conducted a full-scope review of the St. Joseph MMSA AA, which was the only AA in the state that was not part of an MMSA. Examiners placed more emphasis on small loans to businesses in arriving at the overall conclusion. Small loans to businesses represented the majority of BHB's lending

in this AA. BHB did not originate or purchase a sufficient volume of home mortgage loans to conduct a meaningful analysis and did not originate or purchase any small loans to farms in this AA. Examiners also considered the impact of the pandemic as well as BHB's competition, limited branch presence, deposit base, and staffing in this AA when reaching conclusions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

BHB's performance under the Lending Test in Missouri is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the St. Joseph MMSA AA was adequate.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
St. Joseph	17	25	0	0	42	100	100
Total	17	25	0	0	42	100	100

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope:							
St. Joseph	1,418	3,029	0	0	4,447	100	100
Total	1,418	3,029	0	0	4,447	100	100

BHB ranked 10th out of 15 depository institutions (top 67 percent) with a deposit market share of 1.8 percent.

For small loans to businesses, BHB's market share of 0.5 percent ranked 26th out of 66 lenders (top 40 percent). The top three lenders were U.S. Bank, N.A. with 16.1 percent market share, American Express National Bank with 13.8 percent market share, and Commerce Bank with 12.9 percent market share. Of the top 10 small business loan lenders, seven were institutions with large business credit card portfolios with average loan sizes of \$25,000 or less. BHB's average small business loan size was \$174,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a poor geographic distribution of loans in its AA. Examiners placed more emphasis on BHB's performance in moderate-income geographies as they provided more opportunities for BHB to

lend given the higher percentage of small businesses. The AA contained only one low-income geography in 2020-2021 and two in 2022.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was poor.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. BHB did not originate or purchase any small loans to businesses in moderate-income geographies. BHB did not make any PPP loans to small businesses located in low- or moderate-income geographies.

BHB did not originate or purchase any small loans to businesses in 2022.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited a good distribution of loans among businesses of different sizes.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and was near-to the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 44 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated all 13 PPP loans in this AA, totaling approximately \$1.5 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

BHB did not originate or purchase any small loans to businesses in 2022.

Community Development Lending

BHB made few, if any, CD loans.

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

The level of CD lending was poor. Due to limited CD lending opportunities and high competition within the AA, BHB made no CD loans during the evaluation period. In 2021, BHB met with an organization regarding a loan in conjunction with a New Market Tax Credit. However, BHB lost the opportunity to another large institution within the AA. As a result, examiners determined BHB's level of CD lending had a neutral impact on its overall lending performance in the St. Joseph MMSA AA.

Product Innovation and Flexibility

BHB made no use of innovative and/or flexible lending practices in this AA.

INVESTMENT TEST

BHB's performance under the Investment Test in Missouri is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, BHB's performance in the St. Joseph MMSA AA was excellent.

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)
Full-Scope:										
St. Joseph	1	2,662	2	20	3	50.0	2,682	99.5	1	182
Statewide/Regional:										
Greater Missouri	3	14	0	0	3	50.0	14	0.5	0	0
Total	4	2,676	2	20	6	100.0	2,696	100.0	1	182
<small>*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.</small>										

St. Joseph MMSA

BHB had an excellent level of qualified CD investments and grants, though rarely in a leadership position, given its limited presence, strong market competition, and limited investment opportunities. The dollar volume of current- and prior-period investments represented 55.1 percent of tier 1 capital allocated to the AA. This did not include one unfunded commitment totaling \$182,000, an additional 3.7 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs when considering the limited investment opportunities and strong market competition in the AA. As noted, the AA presented constrained opportunities to meet identified community needs. BHB rarely used innovative and/or complex investments to support CD initiatives. BHB had one qualified investment

totaling \$2.7 million related to affordable housing, and two grants totaling \$20,000 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A prior-period investment with \$2.7 million still outstanding in an LIHTC fund that acquired equity interests in affordable housing projects. The investment was allocated to a 38-unit independent senior living facility for low-income residents over the age of 62. Affordable housing was an identified community need in the AA.
- Two \$10,000 grants to the local chapter of a nationwide community services organization to support community education programs. The programs provided financial education, tax preparation services, literacy courses, career services, prescription card services, and early childhood care services. These programs focused primarily on low- and moderate-income impact, with most people served by the program being low- and moderate-income individuals and families.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AA, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AA. BHB made \$14,170 in three investments that benefited the broader statewide or regional area. All these investments were related to community services targeted to low- and moderate-income individuals. These investments supported the overall Investment Test conclusion for the state of Missouri.

SERVICE TEST

BHB's performance under the Service Test in Missouri is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope, BHB's performance in the St. Joseph MMSA AA was good.

Retail Banking Services

Service delivery systems were accessible geographies and individuals of different income levels in BHB's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Full-Scope:													
St. Joseph	100.0	1	100.0	0.0	0.0	100.0	0.0	0.0	5.4	14.9	65.6	14.1	0.0
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent.													

BHB had only one branch in the AA, which was in a middle-income geography. Examiners considered data BHB provided that indicated this branch served customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had one ATM in the AA, which was deposit-taking. BHB provided data that indicated 46.1 percent of customers used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 29.4 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope:							
St. Joseph	0	0	0	0	0	0	0
**The NA category consists of geographies that have not been assigned an income classification.							

BHB did not open or close any branches in the St. Joseph MMSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services. The branch was open from 9:00 a.m. to 5:00 pm, Monday through Friday, and 9:00 a.m. to noon on Saturday.

BHB opened 11 SMART Money checking accounts and no Credit Builder accounts in the St. Joseph MMSA AA during the evaluation period.

Community Development Services

BHB provided a significant level of CD services, consistent with its capacity and expertise to conduct these activities. Leadership was evident by three bank employees who spent 141 hours serving on boards and committees of three different organizations.

Examples of CD services in the AA include:

- A bank employee provided 105 hours serving as treasurer of a community services organization that provided low-income individuals and families with early childhood services and education, emergency assistance, case management, and housing assistance.
- A bank employee provided 10 hours serving on the board of a community service organization that provided programs and services to low- and moderate-income individuals, which included adult behavioral health, children services, home healthcare, therapy, and substance use disorder treatment.

State of Wisconsin

CRA rating for the state of Wisconsin⁹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations noted, BHB's overall geographic distribution and overall borrower distribution of originated and purchased home mortgage loans, small loans to businesses, and small loans to farms was good.
- CD lending activities were effective in addressing community credit needs. BHB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. BHB had an excellent level of qualified investments, grants, and donations.
- BHB's branches and ADS were readily accessible to geographies and individuals of different incomes and responsive in helping BHB provide services across the community.

Description of Institution's Operations in the State of Wisconsin

BHB delineated 14 AAs in the state of Wisconsin. They included the entirety of the Milwaukee-Waukesha-West Allis, WI (Milwaukee); Appleton, WI (Appleton); Eau Claire, WI (Eau Claire); Fond du Lac, WI (Fond du Lac); Green Bay, WI (Green Bay); Janesville-Beloit, WI (Janesville); Oshkosh-Neenah, WI (Oshkosh); Racine, WI (Racine); Sheboygan, WI (Sheboygan); and Wausau, WI (Wausau) MSAs. BHB also delineated portions of the Duluth, MN-WI (Duluth) and La Crosse, WI-MN (La Crosse) MMSAs; and the Madison, WI (Madison) MSA as AAs. Examiners combined the 23 Non-MSA counties into one AA for analysis and presentation. The state of Wisconsin rating does not include the counties included in the Minneapolis MMSA AA and Chicago MMSA AA analyses. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2022, FDIC summary of deposit information, BHB had just over \$23.7 billion in deposits in these AAs, which represented 17.8 percent of BHB's total deposits. During the evaluation period, BHB made almost \$2.9 billion or 22.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 147 office locations and 453 ATMs, of which 192 were deposit-taking, within these AAs. BHB ranked second in deposit market share with 12.7 percent. Primary competitors included U.S. Bank, N.A. with 96 branches and 22.8 percent market share, Associated Bank, N.A. with 142 branches and 10.5 percent market share, and JPMorgan Chase Bank, N.A. with 49 branches and 7.8 percent market share. There were 178 additional FDIC-insured depository institutions with 1,023 offices within BHB's AAs.

⁹For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Milwaukee MSA

The following tables provide a summary of the demographics, including housing and business information, for the Milwaukee MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Milwaukee MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	431	23.0	15.8	32.3	28.3	0.7
Population by Geography	1,570,006	16.7	14.9	33.7	34.7	0.0
Housing Units by Geography	671,468	16.1	15.1	35.4	33.4	0.0
Owner-Occupied Units by Geography	376,569	7.3	11.9	36.2	44.5	0.0
Occupied Rental Units by Geography	247,577	25.6	20.0	36.1	18.3	0.0
Vacant Units by Geography	47,322	35.9	15.3	25.0	23.9	0.0
Businesses by Geography	93,737	11.6	12.1	34.6	41.6	0.0
Farms by Geography	2,176	6.3	7.4	37.1	49.2	0.0
Family Distribution by Income Level	388,209	23.5	16.2	19.4	40.9	0.0
Household Distribution by Income Level	624,146	25.2	15.4	17.0	42.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$186,990
			Median Gross Rent			\$841
			Families Below Poverty Level			11.1%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Milwaukee MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	452	17.9	17.5	33.6	28.8	2.2
Population by Geography	1,574,731	12.8	15.6	35.9	34.6	1.1
Housing Units by Geography	680,891	12.7	16.1	37.6	32.6	0.9
Owner-Occupied Units by Geography	379,661	5.4	12.0	39.8	42.6	0.2
Occupied Rental Units by Geography	254,775	20.7	22.0	36.2	19.4	1.7
Vacant Units by Geography	46,455	28.3	17.7	27.6	23.6	2.8
Businesses by Geography	126,725	10.6	15.4	34.7	38.6	0.7
Farms by Geography	2,784	6.9	9.0	37.6	46.2	0.3
Family Distribution by Income Level	385,268	22.4	16.8	20.5	40.3	0.0
Household Distribution by Income Level	634,436	24.9	15.7	17.2	42.1	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Milwaukee MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$84,829	Median Housing Value			\$209,991
			Median Gross Rent			\$949
			Families Below Poverty Level			8.7%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The Milwaukee MSA AA consisted of Milwaukee, Ozaukee, Washington, and Waukesha counties. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 8.9 percent of total bank deposits. During the evaluation period, BHB made over \$1.3 billion or 10.4 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB operated 54 branches in the AA and had a 13 percent deposit market share which ranked second among all institutions. Competition was significant with 45 other FDIC-insured depository institutions operating 383 offices in the AA. The top four competitors included U.S. Bank, N.A. with 44 branches and 40.1 percent market share, JPMorgan Chase Bank, N.A. with 26 branches and 11.5 percent market share, Associated Bank, N.A. with 42 branches and 7.5 percent market share, and Town Bank, N.A. with 13 branches and 2.46 percent market share.

The median housing value of owner-occupied housing units for the Milwaukee MSA AA was \$186,990 in 2020-2021 and was \$209,991 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 35.3 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$35,882 or \$42,415 and moderate-income families earned less than \$57,411 or \$67,863. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$897 or \$1,060 for low-income borrowers and \$1,435 or \$1,697 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$1,004 or \$1,127. Low-income borrowers would have had difficulty affording a mortgage loan in the Milwaukee MSA AA during both evaluation periods.

Data from Moody's Analytics over the evaluation period indicated that the Milwaukee MSA AA's economy grew slowly, and during 2021 its economy was further than most from a full recovery. During 2021, the MSA had recouped just over half of the jobs lost in the spring of 2020, but the rest of the state had recovered two-thirds. Consumer industries made up ground lost when COVID-19 cases spiked toward the end of 2020. However, two key industries, health care and manufacturing, stayed flat during 2021. Milwaukee's labor force had regained pre-pandemic levels, and by the end of the evaluation period, the unemployment rate had fallen below that of its prerecession level.

Based on data from the BLS, the unemployment rate in the Milwaukee MSA AA was 3.1 percent in January 2020, as high as 14.3 percent in April 2020, and 2.3 percent in December 2022. Major

employers in the AA included: Aurora Health Care Inc.; Froedtert Health; Ascension Wisconsin; Quad Graphics Inc.; Medical College of Wisconsin; Kohl's; GE Healthcare; Northwestern Mutual Life Insurance Co.; Goodwill Industries of Southeastern Wisconsin Inc.; Rockwell Automation; WEC Energy Group; Harley-Davidson Inc.; Johnson Controls Inc.; Baird; Fiserv; and ManpowerGroup.

Examiners reviewed information from three community contact interviews conducted during the evaluation period; one from a local area chamber of commerce, one from an economic development agency, and one from a group meeting that included representatives from 14 various community development organizations serving the Milwaukee MSA AA. These sources identified the following needs within the community:

- New affordable housing including multifamily, mixed-use, and workforce housing developments
- Transportation options for low- and moderate-income people to commute to jobs
- Financial education, including homebuyer counseling and debt management
- Affordable and flexible financing options for home purchase and home rehabilitation
- Flexible loan programs for home purchases and for rehabilitation are needed
- Low-cost, small dollar loans to compete with payday lenders
- Financing for small businesses

The Milwaukee MMSA AA offered adequate opportunities to serve the identified needs. There were several CD and social services organizations in the AA. Local governments had designated areas for redevelopment and used a variety of resources to increase investments in those areas including TIF districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs. Examiners noted at least nine certified CDFIs, six HUD-approved housing counseling agencies, and one SBA Small Business Development center serving the AA.

Appleton MSA

The following tables provide a summary of the demographics, including housing and business information, for the Appleton MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Appleton MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	51	0.0	13.7	76.5	9.8	0.0
Population by Geography	230,108	0.0	11.1	80.3	8.6	0.0
Housing Units by Geography	94,481	0.0	11.7	80.9	7.4	0.0
Owner-Occupied Units by Geography	65,293	0.0	9.2	81.4	9.4	0.0
Occupied Rental Units by Geography	23,795	0.0	18.7	78.1	3.2	0.0
Vacant Units by Geography	5,393	0.0	10.9	87.2	1.9	0.0
Businesses by Geography	12,508	0.0	10.2	82.0	7.8	0.0
Farms by Geography	723	0.0	8.3	85.1	6.6	0.0
Family Distribution by Income Level	61,531	18.2	18.6	24.9	38.3	0.0
Household Distribution by Income Level	89,088	21.7	17.2	20.9	40.2	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Appleton MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA – 11540 Appleton, WI MSA		\$73,709	Median Housing Value			\$160,416
			Median Gross Rent			\$715
			Families Below Poverty Level			6.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Appleton MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	3.4	19.0	58.6	19.0	0.0
Population by Geography	243,147	2.2	13.2	61.0	23.6	0.0
Housing Units by Geography	98,471	2.1	14.4	62.3	21.2	0.0
Owner-Occupied Units by Geography	69,384	0.9	13.2	61.4	24.5	0.0
Occupied Rental Units by Geography	25,164	5.3	17.1	65.0	12.7	0.0
Vacant Units by Geography	3,923	4.1	17.1	62.0	16.9	0.0
Businesses by Geography	16,476	4.5	11.2	63.5	20.9	0.0
Farms by Geography	823	0.9	8.3	67.4	23.5	0.0
Family Distribution by Income Level	63,780	17.6	19.3	24.8	38.3	0.0
Household Distribution by Income Level	94,548	22.0	17.0	20.4	40.6	0.0
Median Family Income MSA – 11540 Appleton, WI MSA		\$86,686	Median Housing Value			\$185,835
			Median Gross Rent			\$808
			Families Below Poverty Level			4.9%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The Appleton MSA AA consisted of Calumet and Outagamie counties. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 0.6 percent of total bank deposits. During the evaluation period, BHB made almost \$132.7 million or 1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB operated six branches in the AA and had a 15.8 percent deposit market share which ranked first among all institutions. Competition was significant with 25 other FDIC-insured depository institutions operating 48 offices in the AA. The top four competitors included JPMorgan Chase, N.A. with three branches and 14 percent market share, Associated Bank, N.A. with four branches and 12 percent market share, Nicolet National Bank with five branches and 9.3 percent market share, and State Bank of Chilton with four branches and 6.4 percent market share.

The median housing value of owner-occupied housing units for the Appleton MSA AA was \$160,416 in 2020-2021 and was \$185,835 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 39.6 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$36,855 or \$43,343 and moderate-income families earned less than \$58,967 or \$69,349. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$921 or \$1,084 for low-income borrowers and \$1,474 or \$1,734 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would have been \$861 or \$998. Low-income borrowers would have had difficulty affording a mortgage loan in the Appleton MSA AA during both evaluation periods.

Data from Moody's Analytics over the evaluation period indicated that amid upward pressure from an expanding labor force, the Appleton MSA AA's low jobless rate suggested labor market tightness was constraining job gains. Home prices were advancing at the fastest pace in decades, but growth lagged the state and national averages. Single-family home construction had cooled after rallying at the start of 2021.

Based on data from the BLS, the unemployment rate in the Appleton MSA AA was 2.8 percent in January 2020, as high as 13.2 percent in April 2020, and was 1.9 percent in December 2022. Major employers in the AA included: ThedaCare Inc.; Affinity Health System; Kimberly-Clark; Thrivent Financial for Lutherans; Amcor Plc.; Expera Specialty Solutions Inc.; Faith Technologies Inc.; Pierce Manufacturing Inc.; Plexus Services Corp.; Miller Electric Manufacturing Co.; Bergstrom Corp.; J.J. Keller & Associates Inc.; R.R. Donnelly; West Corp.; Gulfstream; Neenah Enterprises Inc.; Appvion; Menasha Corp.; Nestle Pizza; and SCA Tissue North America.

Examiners reviewed area community action plans and information from one community contact interview conducted during the evaluation period with an affordable housing agency. These sources identified the following needs within the community:

- Affordable housing
- Adequate infrastructure and public services
- Attracting and retaining businesses and industries
- Increasing employment opportunities

The Appleton MSA AA presented constrained opportunities to meet the identified needs. There were a limited number of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted no certified CDFIs, one HUD-approved housing counseling agency, and no SBA Small Business Development centers serving the AA.

Racine MSA

The following tables provide a summary of the demographics, including housing and business information, for the Racine MSA AA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Racine MSA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	6.7	20.0	46.7	20.0	6.7
Population by Geography	194,895	6.7	20.3	53.3	18.9	0.8
Housing Units by Geography	82,261	6.3	21.1	53.1	18.6	1.0
Owner-Occupied Units by Geography	52,516	2.7	16.1	57.4	23.6	0.2
Occupied Rental Units by Geography	22,667	12.0	29.9	47.2	8.5	2.4
Vacant Units by Geography	7,078	14.3	29.5	39.9	13.9	2.5
Businesses by Geography	9,954	5.3	18.9	53.6	19.3	2.9
Farms by Geography	428	1.9	7.0	54.4	36.7	0.0
Family Distribution by Income Level	50,245	20.0	17.8	21.9	40.3	0.0
Household Distribution by Income Level	75,183	23.4	15.6	19.5	41.4	0.0
Median Family Income MSA – 39540 Racine, WI MSA		\$68,728	Median Housing Value			\$161,164
			Median Gross Rent			\$795
			Families Below Poverty Level			9.2%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Racine MSA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	8.5	19.1	34.0	34.0	4.3
Population by Geography	197,727	9.1	17.9	36.9	35.7	0.5
Housing Units by Geography	82,977	10.2	18.2	37.1	34.4	0.0
Owner-Occupied Units by Geography	52,896	4.2	15.0	38.1	42.7	0.0
Occupied Rental Units by Geography	24,752	20.7	24.4	35.6	19.3	0.0
Vacant Units by Geography	5,329	21.3	21.0	34.6	22.9	0.2
Businesses by Geography	12,643	10.8	15.8	36.2	37.0	0.1
Farms by Geography	507	3.2	6.3	31.0	59.6	0.0
Family Distribution by Income Level	51,478	21.0	18.3	20.1	40.5	0.0
Household Distribution by Income Level	77,648	24.0	16.0	18.2	41.7	0.0
Median Family Income MSA – 39540 Racine, WI MSA		\$77,503	Median Housing Value			\$182,995
			Median Gross Rent			\$886
			Families Below Poverty Level			8.6%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0 percent. * The NA category consists of geographies that have not been assigned an income classification.						

The Racine MSA AA consisted of Racine county. Based on June 30, 2022, FDIC summary of deposit information, BHB deposits in the AA comprised 0.3 percent of total bank deposits. During the evaluation period, BHB made almost \$78.6 million or 0.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB operated six branches in the AA and had a 10.2 percent deposit market share which ranked third among all institutions. Competition was significant with 13 other FDIC-insured depository institutions operating 35 offices in the AA. The top four competitors included Johnson Bank with six branches and 36.1 percent market share, Community State Bank with four branches and 10.9 percent market share, Tri City National Bank with five branches and 6.8 percent market share, and JPMorgan Chase, N.A. with two branches and 6.4 percent market share.

The median housing value of owner-occupied housing units for the Racine MSA AA was \$161,164 in 2020-2021 and was \$182,995 in 2022. In addition, the FHFA HPI calculator indicated housing values in the MSA increased approximately 33.4 percent over the evaluation period.

Based on the information in the above tables, depending on the respective evaluation period (2020-2021 or 2022), low-income families earned less than \$34,364 or \$38,752 and moderate-income families earned less than \$54,982 or \$62,002. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$859 or \$969 for low-income borrowers and \$1,375 or \$1,550 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would have been \$865 or \$982. Low-income borrowers would have had difficulty affording a mortgage loan in the Racine MSA AA during both evaluation periods.

Data from Moody's Analytics over the evaluation period indicated that the Racine area's population contracted at its fastest pace in nearly a decade in 2020. While the natural rate of population growth was better than average, weak economic performance, and few drivers outside of manufacturing job growth caused residents to flee in search of better opportunities. The Racine MSA AA was one of the most factory-dependent metro areas in the nation. Its factories had excess capacity to add workers, which enabled relatively strong employment gains during 2022. Manufacturing jobs were among the best paying in the metro area and the gains here had an outsized impact.

Based on data from the BLS, the unemployment rate in the Racine MSA AA was 4 percent in January 2020, as high as 15.3 percent in April 2020, and 2.5 percent in December 2022. Major employers in the AA included: All Saints Health Care System; S. C. Johnson & Son Inc.; CNH America LLC; Emerson Electric; Johnson/ Diversey Inc.; Aurora Health Care; Modine Manufacturing Co.; Bombardier Motor Corp. of America; Rudd Lighting; and Nestle USA Inc.

Examiners reviewed area community action plans and information from one community contact interview conducted during the evaluation period with a local economic development corporation and identified the following needs within the community:

- Financing for, and support of, affordable housing, including housing for seniors, the homeless, and workforce developments
- Improved public transportation

- Job creation by attracting and retaining businesses, including farms
- Improvements in local infrastructure and public services

The Racine MSA AA presented constrained opportunities to meet the identified needs. There were a limited number of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. Examiners noted no certified CDFIs, one HUD-approved housing counseling agency, and one SBA Small Business Development center serving the AA.

Scope of Evaluation in Wisconsin

The state of Wisconsin was BHB's second largest market. Examiners selected three AAs for full-scope reviews. Examiners completed a full-scope review for the Milwaukee MSA AA as it was the AA with the largest percentage of deposits at 49.8 percent and BHB's market share of 13 percent ranked second out of 46 depository institutions. Examiners also selected the Appleton and Racine MSA AAs to receive full-scope reviews. The Duluth; Eau Claire; Fond du Lac; Green Bay; Janesville; La Crosse; Madison; Oshkosh; Sheboygan, and Wausau MSAs; and the Non-MSA Wisconsin AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based the ratings on the results of the AAs that received full-scope reviews and BHB's performance in the limited-scope AAs, as applicable. The Milwaukee MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Wisconsin.

Examiners placed more emphasis on the loan product that had the larger percentage of lending within each AA. Examiners place more emphasis on small loans to businesses versus home mortgage loans and small loans to farms in arriving at the overall conclusions in the Milwaukee, Racine, Janesville, La Crosse, and Madison MSA AAs. In the remaining AAs, examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms. Only during the 2020-2021 period in the Milwaukee, Appleton, Eau Claire, Fond du Lac, Green Bay, Janesville, Madison, and Wausau MSAs, and in the Non-MSA Wisconsin AAs did BHB make enough small loans to farm to conduct any meaningful analyses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

BHB's performance under the Lending Test in Wisconsin is rated Outstanding. Performance in the limited-scope AAs supported the overall Lending Test conclusion for the state of Wisconsin.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, BHB's performance in the Milwaukee, Appleton, and Racine MSA AAs was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Full-Scope:							
Milwaukee	3,911	5,977	59	179	10,126	43.2	49.8
Appleton	510	436	118	9	1,073	4.6	3.6
Racine	355	415	6	15	791	3.4	1.9
Limited-Scope:							
Duluth	50	36	0	1	87	0.4	0.4
Eau Claire	151	138	35	5	329	1.4	0.7
Fond du Lac	175	108	32	2	317	1.4	0.8
Green Bay	722	674	68	18	1,482	6.3	5.0
Janesville	326	363	29	8	726	3.1	2.3
La Crosse	80	188	4	6	278	1.2	0.5
Madison	1,116	1,224	122	32	2,494	10.6	15.3
Oshkosh	275	189	11	11	486	2.1	0.8
Sheboygan	256	164	8	5	433	1.8	1.1
Wausau	330	259	41	14	644	2.7	5.1
Non-MSA Wisconsin	2,174	1,608	391	24	4,197	17.9	12.6
Total	10,431	11,779	924	329	23,463	100.00	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Full-Scope:							
Milwaukee	743,767	573,641	4,931	491,810	1,814,149	50.2	49.8
Appleton	76,847	50,158	5,649	44,123	176,777	4.9	3.6
Racine	48,054	30,288	225	35,924	114,491	3.2	1.9
Limited-Scope:							
Duluth	5,199	4,577	0	3,702	13,478	0.4	0.4
Eau Claire	20,420	14,440	3,645	14,076	52,581	1.5	0.7
Fond du Lac	20,402	6,865	1,662	11,808	40,737	1.1	0.8
Green Bay	91,189	58,221	5,807	48,177	203,394	5.6	5.0
Janesville	36,002	30,958	1,783	22,362	91,105	2.5	2.3
La Crosse	10,183	18,278	568	8,234	37,263	1.0	0.5
Madison	250,270	83,776	9,518	167,448	511,012	14.1	15.3
Oshkosh	37,775	15,868	560	7,310	61,513	1.7	0.8
Sheboygan	25,239	99,325	202	30,618	155,384	4.3	1.1
Wausau	36,459	36,462	2,213	43,847	118,981	3.3	5.1
Non-MSA Wisconsin	167,844	21,924	612	34,291	224,671	6.2	12.6
Total	1,569,650	1,044,781	37,375	963,730	3,615,536	100.00	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.							

Milwaukee MSA

Lending levels reflected excellent responsiveness to AA credit needs in the Milwaukee MSA AA.

BHB ranked second out of 46 depository institutions (top 5 percent) with a deposit market share of 13.0 percent.

For home mortgage loans, BHB's market share of 1.5 percent ranked 18th out of 589 lenders (top 4 percent). The top three lenders were Landmark Credit Union with 9.8 percent market share, Wells Fargo Bank, N.A. with 4.4 percent market share, and UW Credit Union with 4.1 percent market share. Of the top 15 home mortgage lenders, five were NDFIs, four were credit unions, and three were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 5.6 percent ranked fourth out of 168 lenders (top 3 percent). The top three lenders were U.S. Bank, N.A. with 18.4 percent market share, JPMorgan Chase Bank, N.A. with 14.7 percent market share, and American Express National Bank with 11.2 percent market share. Of the top 10 small business loan lenders, six were institutions with large business credit card portfolios with an average loan size of \$20,000 or less. BHB's average small business loan size was \$74,000.

For small loans to farms, BHB's market share of 11.6 percent ranked fourth out of 21 lenders (top 20 percent). The top three lenders were U.S. Bank, N.A. with 23.7 percent market share, JPMorgan Chase Bank, N.A. with 18.8 percent market share, and John Deere Financial, FSB with 12.1 percent market share. Of the top 10 small farm loan lenders, six are institutions with average loan sizes of \$18,000 or less. BHB's average small farm loan size was \$35,000.

Appleton MSA

Lending levels reflected adequate responsiveness to AA credit needs in the Appleton MSA AA.

BHB ranked first out of 26 depository institutions (top 4 percent) with a deposit market share of 15.8 percent.

For home mortgage loans, BHB's market share of 1.1 percent ranked 25th out of 310 lenders (top 9 percent). The top three lenders were Community First Credit Union with 12.7 percent market share, Fox Communities Credit Union with 9.2 percent market share, and Associated Bank, N.A. with 4.1 percent market share. Of the top 15 home mortgage lenders, five were NDFIs, three were credit unions, and four were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 3.4 percent ranked ninth out of 77 lenders (top 12 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 15.3 percent market share, U.S. Bank, N.A. with 14.3 percent market share, and Nicolet National Bank with 13.7 percent market share. Of the top 10 small business loan lenders, six are institutions with large business credit card portfolios with average loan sizes of \$24,000 or less. BHB's average small business loan size was \$79,000.

For small loans to farms, BHB's market share of 30.1 percent ranked first out of 14 lenders (top 8 percent). The other lenders in the top three were John Deere Financial, FSB with 18.2 percent market share and U.S. Bank, N.A. with 11.8 percent market share.

Racine MSA

Lending levels reflected excellent responsiveness to AA credit needs in the Racine MSA AA.

BHB ranked third out of 14 depository institutions (top 22 percent) with a deposit market share of 10.2 percent.

For home mortgage loans, BHB's market share of 1 percent ranked 24th out of 331 lenders (top 8 percent). The top three lenders were Landmark Credit Union with 9.8 percent market share, Wells Fargo Bank, N.A. with 4.4 percent market share, and UW Credit Union with 4.1 percent market share. Of the top 15 home mortgage lenders, six were NDFIs, three were credit unions, and four were national banks with large mortgage loan operations.

For small loans to businesses, BHB's market share of 4.3 percent ranked seventh out of 85 lenders (top 9 percent). The top three lenders were U.S. Bank, N.A. with 16.9 percent market share, JPMorgan Chase Bank, N.A. with 16.6 percent market share, and American Express National Bank with 10.4 percent market share. Of the top 10 small business loan lenders, seven were institutions with large business credit card portfolios with an average loan size of \$28,000 or less. BHB's average small business loan size was \$59,000.

Distribution of Loans by Income Level of the Geography

BHB exhibited a good geographic distribution of loans in its AAs. Examiners generally placed more emphasis on BHB's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms. In the Appleton MSA AA, there were no geographies designated as low-income during the 2020 through 2021 period.

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 BHB's home mortgage loan originations and purchases. Examiners considered the impact of heavy competition among home mortgage lenders, including the significant operations of NDFIs.

Milwaukee MSA

The geographic distribution of home mortgage loans was adequate.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was near-to, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans in both low- and moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies.

Appleton MSA

The geographic distribution of home mortgage loans was adequate.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units in those geographies and below the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of home mortgage loans in low-income geographies exceeded and in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies.

Racine MSA

The geographic distribution of home mortgage loans was adequate.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

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 BHB's originations and purchases of small loans to businesses.

Milwaukee MSA

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies was near-to the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies approximated, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders. This analysis included 811 PPP loans totaling \$97.9 million that supported businesses located in low- or moderate-income geographies during the COVID-19 pandemic.

For 2022, BHB's performance was stronger than the 2020 through 2021 performance. The percentage of small loans to businesses loans in both low- and moderate-income geographies exceeded the percentage of businesses located in those geographies.

Appleton MSA

The geographic distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in moderate-income geographies was near-to the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders. This analysis included 28 PPP loans totaling \$3.3 million that supported businesses located in low- or moderate-income geographies during the COVID-19 pandemic.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Racine MSA

The geographic distribution of small loans to businesses was good.

For 2020 through 2021, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively. Included in this analysis were 59 PPP loans totaling \$5.4 million that supported businesses located in low- or moderate-income geographies during the COVID-19 pandemic.

For 2022, BHB's performance was consistent with the 2020 through 2021 performance.

Small Loans to Farms

Refer to Table S in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of BHB's originations and purchases of small loans to farms. Examiners also considered the low number of small farms in low- and moderate-income geographies and that BHB does not focus on farm lending.

Milwaukee MSA

The geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the percentage of small loans to farms originated or purchased in both low- and moderate-income geographies was well below the percentage of farms located in those geographies but approximated the aggregate percentage of all reporting lenders. Included in this analysis were two loans totaling \$20,000 that supported farms located in low- or moderate-income geographies during the COVID-19 pandemic.

For 2022, BHB did not originate or purchase a sufficient volume of small farm loans to perform a meaningful analysis.

Appleton MSA

The geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the percentage of small loans to farms originated or purchased in moderate-income geographies was well below the percentage of farms located in those geographies but exceeded the aggregate percentage of all reporting lenders. Included in this analysis were six loans totaling \$95,000 that supported farms located in low- or moderate-income geographies during the COVID-19 pandemic.

For 2022, BHB did not originate or purchase a sufficient volume of small farm loans to perform a meaningful analysis.

Lending Gap Analysis

Examiners analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes. For all three full-scope areas, examiners considered housing costs in relation to the median family incomes and the significant increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

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 BHB's home mortgage loan originations and purchases.

Milwaukee MSA

The distribution of home mortgage loans among individuals of different income levels was good.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was stronger than 2020 through 2021 performance. The percentage of home mortgage loans to low-income borrowers was near-to the percentage of those families in the AA.

Appleton MSA

The distribution of home mortgage loans among individuals of different income levels was excellent.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was near-to, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was near-to, the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with 2020 through 2021 performance.

Racine MSA

The distribution of home mortgage loans among individuals of different income levels was excellent.

For 2020 through 2021, the percentage of home mortgage loans originated or purchased to low-income borrowers was near-to, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

For 2022, BHB's performance was consistent with 2020 through 2021 performance.

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 BHB's originations and purchases of small loans to businesses.

Milwaukee MSA

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 64.7 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 3,296 out of 4,161 PPP loans, totaling approximately \$317.1 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was stronger than 2020 through 2021 performance. The percentage of small loans to businesses was below the percentage of small businesses in the AA.

Appleton MSA

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 66.7 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 249 out of 307 PPP loans, totaling approximately \$29 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with 2020 through 2021 performance.

Racine MSA

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 55.6 percent of its small loans to businesses, including PPP loans. Examiners considered the fact that BHB originated 191 out of 253 PPP loans, totaling approximately \$12.6 million, to businesses with revenues not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB's performance was consistent with 2020 through 2021 performance.

Small Loans to Farms

Refer to Table T in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of BHB's originations and purchases of small loans to farms. Examiners considered that farm lending was not a primary product for BHB.

Milwaukee MSA

The distribution of loans to farms of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small farms originated or purchased was well below the percentage of small farms in the AA and below the aggregate percentage of reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 39.6 percent of its small loans to farms, including PPP loans. Examiners considered the fact that BHB originated 22 out of 30 PPP loans, totaling approximately \$554,000, to farms with revenue not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Appleton MSA

The distribution of loans to farms of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small farms originated or purchased was well below the percentage of small farms in the AA and near-to the aggregate percentage of reporting lenders. BHB did not collect or consider the gross annual revenues in the underwriting of 47.9 percent of its small loans to farms, including PPP loans. Examiners considered the fact that BHB originated 56 out of 100 PPP loans, totaling approximately \$1.4 million to farms with revenue not reported. Consideration of BHB's volume of PPP lending had a positive impact on the conclusion.

For 2022, BHB did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Community Development Lending

BHB was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

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

Milwaukee MSA

The level of CD lending was excellent. BHB made 179 loans totaling \$491.8 million, which represented 37.6 percent of allocated tier 1 capital. BHB utilized complex CD loans, often in a leadership position. These loans were responsive to identified community credit needs. By dollar volume, 52.1 percent funded revitalization and stabilization efforts, 19.8 percent funded affordable housing that provided 561 units, 19.7 percent funded economic development activities, and 8.4 percent funded community services. This included 117 PPP loans totaling \$251.6 million that helped stabilize businesses during the COVID-19 pandemic.

Examples of the other CD loans are as follows:

- A \$13 million term loan that supported the growth of a family-owned manufacturing business. The expansion project included a new 100,000 square foot building that added an office, warehouse, and manufacturing facility adjacent to existing buildings. This project created 82 full-time and 14 part-time jobs with an annual salary of less than \$66,000 per year.
- A \$10.6 million construction loan for the development of a 49-unit apartment building for low- and moderate-income seniors. The project involved adaptive reuse and rehabilitation of a vacant, historic school. Forty-three units were reserved for tenants with incomes of 60 percent or less of the area median income. The remaining six units were also considered affordable, with rents ranging from \$394-\$900 per month. This project involved complex financing, which included LIHTCs, federal and state historic tax credits, and a tax incremental district note.
- The renewal of a \$3 million term loan and \$5 million working line of credit to a CDFI. This financing supported the CDFI's loan programs. The CDFI served local businesses with the financial resources needed to grow, while facilitating business investment that will benefit the AA through new employment opportunities, job retention, and neighborhood stabilization.

Appleton MSA

The level of CD lending was excellent. BHB made nine loans totaling \$44.1 million, which represented 47.2 percent of allocated tier 1 capital. These CD loans were responsive to identified credit needs. By dollar volume, 95.9 percent of the loans funded revitalization and stabilization efforts and 4.1 percent supported economic development. This included six PPP loans totaling almost \$12.3 million that helped stabilize businesses during the COVID-19 pandemic.

Examples of CD loans in the AA include:

- Two loans totaling \$30 million to purchase a vacant building to construct a new warehouse. This project was in a moderate-income geography and created 20 new jobs paying wages between \$33,000 and \$55,000.

- A \$1.8 million loan to renew the financing for the construction of a new restaurant. The opening created 62 new jobs and employment opportunities for low- and moderate-income individuals.

Racine MSA

The level of CD lending was excellent. BHB made 15 loans totaling \$35.9 million, which represented 72 percent of allocated tier 1 capital. CD loans were responsive to identified credit needs. By dollar volume, 76.1 percent funded revitalization or stabilization efforts, 19.5 percent funded economic development, 2.7 percent funded community services, and 1.5 percent funded affordable housing that provided 20 units. This included eight PPP loans totaling \$27.3 million that helped stabilize businesses during the COVID-19 pandemic.

Examples of CD loans in the AA include:

- Two SBA 504 loans totaling \$3.5 million to finance construction of a restaurant that would employ approximately 100 staff members.
- A \$500,000 working capital loan to a certified Wisconsin Medicaid Personal Care provider, which provided services to help low- and moderate-income persons with disabilities achieve their independent living goals.
- The renewal of a \$554,288 term loan used to finance a 20-unit apartment complex, all of which had rents under the FFIEC affordable limit for the AA.

Broader Statewide or Regional Areas

BHB made 12 CD loans totaling \$81.7 million to entities in the broader statewide or regional area. This total consisted of 10 loans totaling \$78.6 million for community services primarily related to healthcare. In addition, BHB made one PPP loan and one loan to a family farm.

Product Innovation and Flexibility

Milwaukee MSA

BHB made extensive use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 928 loans totaling \$28.5 million among the various flexible lending products available in the Milwaukee MSA AA. This included 133 Home Possible loans totaling \$15.5 million, 21 HFA loans totaling \$3.5 million, 17 FHA loans totaling \$2.8 million, eight NHLP loans totaling \$851,540, 317 Special Purpose Credit Program loans totaling \$5.2 million, and 432 Credit Builder loans totaling \$584,050. In addition, BHB facilitated the use of 76 DPAs totaling \$380,000 and 111 BHB grants totaling \$333,000.

Appleton MSA

BHB made use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 46 loans totaling \$1.2 million among the various flexible lending products available in the Appleton MSA AA. This included four HFA loans totaling \$506,900, two Home Possible loans totaling \$326,000, one FHA loan totaling over \$224,000, 10 Special Purpose Credit

Program loans totaling \$129,400, and 29 Credit Builder loans totaling \$31,000. In addition, BHB facilitated the use of four DPAs totaling \$20,000.

Racine MSA

BHB made use of innovative and/or flexible lending practices to serve AA credit needs. During the evaluation period, BHB made 86 loans totaling \$2.1 million among the various flexible lending products available in the Racine MSA AA. This included eight Home Possible loans totaling \$887,700, five HFA loans totaling \$751,423, one FHA loan totaling over \$173,000, 49 Credit Builder loans totaling \$53,000, and 23 Special Purpose Credit Program loans totaling \$230,000. In addition, BHB facilitated the use of 10 DPAs totaling \$50,000 and three BHB grants totaling \$9,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in the Duluth, Eau Claire, Fond du Lac, Green Bay, Janesville, La Crosse, Madison, Oshkosh, Sheboygan, and Wausau MSAs, and the Non-MSA Wisconsin AAs was consistent with BHB's overall performance under the Lending Test in the full-scope AAs. Performance in the limited-scope AAs supported the overall Lending Test rating.

Refer to Tables O through T in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

BHB's performance under the Investment Test in Wisconsin is rated Outstanding. BHB's performance in the limited-scope AAs supported the overall Investment Test conclusion for the state of Wisconsin.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, BHB's performance in the Milwaukee, Appleton, and Racine MSA AAs was excellent.

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)
Full-Scope:										
Milwaukee	41	49,826	183	79,804	224	39.5	129,630	43.5	32	50,178
Appleton	7	3,198	14	2,473	21	3.7	5,671	1.9	4	188
Racine	4	7,114	3	860	7	1.2	7,974	2.7	3	988
Limited-Scope:										
Duluth	1	74	2	400	3	0.5	474	0.2	1	5
Eau Claire	3	1,231	14	10,100	17	3.0	11,331	3.8	0	0
Fond du Lac	3	1,742	3	252	6	1.1	1,994	0.7	2	37
Green Bay	2	3,417	34	10,759	36	6.3	14,176	4.8	2	832

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Janesville	6	2,003	15	896	21	3.7	2,899	1.0	0	0
La Crosse	0	0	4	3,538	4	0.7	3,538	1.2	0	0
Madison	10	15,572	47	15,070	57	10.1	30,642	10.3	7	9,669
Oshkosh	1	43	6	7,148	7	1.2	7,191	2.4	1	20
Sheboygan	3	858	11	9,106	14	2.5	9,964	3.3	1	330
Wausau	3	1,566	10	4,630	13	2.3	6,196	2.1	3	823
Non-MSA Wisconsin	27	23,672	53	21,743	80	14.1	45,415	15.2	2	429
Statewide/Regional:										
Broader Wisconsin	18	5,441	39	15,352	57	10.1	20,793	7.0	1	1
Total	129	115,757	438	182,131	567	100.0	297,888	100.0	59	63,499
<p>*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>**Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</p>										

Milwaukee MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.9 percent of tier 1 capital allocated to the AA. This did not include 32 unfunded commitments totaling \$50.2 million, an additional 3.8 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB made significant use of innovative and/or complex investments to support CD initiatives. BHB had 43 qualified investments and grants totaling \$88 million related to affordable housing, 148 totaling \$21.4 million to community service organizations that provided needed services to low- and moderate-income individuals, 22 totaling \$19.5 million related to economic development, and 11 totaling \$678,099 for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- A \$13.9 million investment in a single-investor LIHTC fund that acquired a 79-unit affordable housing project in the AA. Of the units, 49 were LIHTC units restricted to individuals earning 60 percent or less of the area median income and 16 units met affordability requirements with market rents below the FFIEC affordable limit for the MSA. BHB also originated a \$19.5 million CD loan to fund construction and sponsored the project's FHLB HAP application.
- BHB invested \$2.6 million in grants to a nonprofit organization that provided community services to low- and moderate-income individuals and families. The organization's mission was to provide resources that had a positive impact on the community's health, education, and financial stability. Over 91 percent of the organization's clients were low- or moderate-income.
- BHB invested \$1 million in a first-time venture fund that provided initial and early-stage investments in businesses located primarily in low- or moderate-income geographies in the AA.

Fund eligibility criteria included companies with a primary purpose of promoting affordable housing for low- or moderate-income individuals; activities that revitalize or stabilize low- and moderate-income geographies or disaster areas; and companies that met the SBA's eligibility standards for a SBDC or SBIC program or had annual gross revenues of \$1 million or less.

Appleton MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 6.1 percent of tier 1 capital allocated to the AA. This did not include four unfunded commitments totaling \$18,231, an additional 0.2 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs and made significant use of innovative and/or complex investments to support CD initiatives given the limited investment opportunities in the AA. BHB had six qualified investments and grants totaling \$3.2 million related to affordable housing and 15 totaling \$2.5 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- BHB provided almost \$2.3 million in investments in multi-investor LIHTC funds that participated in five affordable housing projects throughout the Appleton AA. The investments created 265 units of housing affordable to low- and moderate-income individuals or families.
- BHB provided \$40,000 in grants to support the food program of a local chapter of a nationwide organization supporting low- and moderate-income youths. The organization provided youth programming, counseling, academic intervention programs, and after school and summer programs for children of low- and moderate-income parents. The food program provided healthy meals, snacks, and nutrition education to combat food insecurity and health disparities.

Racine MSA

BHB had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 16 percent of tier 1 capital allocated to the AA. This did not include three unfunded commitments totaling \$987,500, an additional 2 percent of allocated capital.

BHB exhibited excellent responsiveness to community credit and economic development needs. BHB had three qualified investments and grants totaling \$3.8 million related to economic development, two totaling \$3.7 million related to affordable housing, and two totaling \$408,276 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A \$3.7 million investment in a LIHTC for a 170-unit development located in a moderate-income geography. The development restricted all units to low- and moderate-income persons 55 years of age or older.

- A prior-period investment with \$2 million still outstanding in an SBIC that provided funding for small businesses in the AA. The fund focused on energy businesses and value-added manufacturing companies for growth and operating improvements.

Broader Statewide or Regional Area

Because BHB was responsive to community development needs and opportunities in its AAs, examiners considered broader statewide and regional investments that did not have a purpose, mandate, or function to serve the AAs. During the evaluation period, BHB made 57 investments totaling \$20.8 million in the broader statewide or regional area. Investments included 44 for community services benefiting low-and moderate-income individuals, seven for revitalization and stabilization efforts, four for economic development, and two related to affordable housing. These investments supported the overall Investment Test conclusion for the state of Wisconsin.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in the Eau Claire, Fond du Lac, Green Bay, Madison, and Sheboygan MSAs, and the Non-MSA Wisconsin AAs, was consistent with BHB's overall performance under the Investment Test in the full-scope AAs. BHB's performance in the Duluth, Janesville, La Crosse, Oshkosh, and Wausau MSA AAs was good, which was weaker than BHB's overall performance under the Investment Test in the full-scope AAs. The weaker performance in the Duluth, Janesville, and Wausau MSA AAs was due to a lower volume of qualified investments. The weaker performance in the La Crosse and Oshkosh MSA AAs was due to a lower level of responsive or complex investments. Performance in the limited-scope AAs supported the overall Investment Test conclusion for the state of Wisconsin.

SERVICE TEST

BHB's performance under the Service Test in Wisconsin is rated Outstanding. Performance in the limited-scope AAs did not alter the Service Test conclusion for the state of Wisconsin.

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, BHB's performance in the Milwaukee MSA AA was excellent, and in the Appleton MSA and Racine MSA AAs was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in BHB's AAs.

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA
Full-Scope:													
Milwaukee	49.8	54	36.7	7.4	13.0	35.2	42.6	1.9	12.8	15.6	35.9	34.6	1.1
Appleton	3.6	6	4.1	16.7	16.7	66.7	0.0	0.0	2.2	13.2	61.0	23.6	0.0
Racine	1.9	6	4.1	16.7	0.0	50.0	33.3	0.0	9.1	17.9	36.9	35.7	0.5
Limited-Scope:													
Duluth	0.4	1	0.7	100.0	0.0	0.0	0.0	0.0	4.8	21.5	73.7	0.0	0.0
Eau Claire	0.7	3	2.0	0.0	33.3	33.3	33.3	0.0	0.0	19.0	60.0	21.0	0.0
Fond du Lac	0.8	2	1.4	0.0	0.0	100.0	0.0	0.0	0.0	18.9	64.1	17.0	0.0
Green Bay	5.0	8	5.4	12.5	25.0	50.0	12.5	0.0	0.5	23.3	54.8	21.1	0.3
Janesville	2.3	5	3.4	20.0	0.0	40.0	40.0	0.0	0.5	24.3	50.9	24.2	0.0
La Crosse	0.5	2	1.4	0.0	50.0	50.0	0.0	0.0	2.1	18.8	57.8	16.7	4.7
Madison	15.3	17	11.6	0.0	41.2	35.3	23.5	0.0	3.5	15.4	53.1	24.4	3.6
Oshkosh	0.8	3	2.0	0.0	33.3	0.0	33.3	33.3	0.0	15.9	65.0	14.7	4.4
Sheboygan	1.1	4	2.7	0.0	0.0	100.0	0.0	0.0	0.0	7.6	72.9	19.5	0.0
Wausau	5.1	5	3.4	0.0	40.0	40.0	20.0	0.0	0.0	20.3	71.6	8.1	0.0
Non-MSA Wisconsin	12.6	31	21.1	3.2	22.6	64.5	9.7	0.0	0.3	8.4	74.9	16.4	0.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.													
**The NA category consists of geographies that have not been assigned an income classification.													
Due to rounding, totals may not equal 100.0 percent.													

Milwaukee MSA

BHB's distribution of branches in low-income geographies was below, and in moderate-income geographies was near-to, the percentage of the population living within those geographies. Examiners further considered nine middle- or upper-income branches, five that were "across the street" from a low- or moderate-income geography and four that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had 184 ATMs in the AA, of which 74 were deposit-taking. BHB provided data that indicated 53.9 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. While this was a 4.6 percent decrease from fourth quarter 2019, these systems continue to provide additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Appleton MSA

BHB's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered one middle-income

branch that was “across the street” from a moderate-income geography, which improved access and supported the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had nine ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 50.4 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 7 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Racine MSA

BHB’s distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. BHB did not have any branches in moderate-income geographies. Examiners further considered three middle- or upper-income branches that data indicated served a significant number of customers from low- or moderate-income geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

BHB offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB had seven ATMs in the AA, all of which were deposit-taking. BHB provided data that indicated 51.6 percent of customers of branches in or serving low- or moderate-income geographies used the mobile banking application or online banking during fourth quarter 2022. This was an increase of 50.4 percent from fourth quarter 2019. These systems provided additional delivery availability and access to banking services to both retail and business customers and had a positive impact on the Service Test conclusion.

Distribution of Branch Openings/Closings*							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA**
Full-Scope:							
Milwaukee	0	7	-2	0	-1	-4	0
Appleton	0	3	0	0	-3	0	0
Racine	0	0	0	0	0	0	0
Limited-Scope							
Duluth	0	0	0	0	0	0	0
Eau Claire	0	0	0	0	0	0	0
Fond du Lac	0	0	0	0	0	0	0
Green Bay	0	3	0	0	-3	0	0
Janesville	0	3	0	0	-2	-1	0
LaCrosse	0	1	0	0	-1	0	0
Madison	0	4	-1	0	-3	0	0
Oshkosh	0	0	0	0	0	0	0
Sheboygan	0	0	0	0	0	0	0
Wausau	0	2	0	-1	-1	0	0
Non-MSA Wisconsin	0	8	0	-2	-6	0	0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							
**The NA category consists of geographies that have not been assigned an income classification.							

Milwaukee MSA

To the extent changes have been made, BHB's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB did not open any branches and closed seven branches, two in low-income geographies, one in a middle-income geography, and four in upper-income geographies. The branch closures resulted from BHB reassessing its delivery services due to changes in usage. One low-income geography branch closure was a limited access branch located within a manufacturing facility that was accessible only to employees of that company. BHB consolidated the other low-income branch into another branch less than 1.3 miles away.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low-and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All but one branch had the same lobby hours and drive-thru hours Monday through Friday from 9:00 a.m. to 5:00 pm. One branch was in a retirement community in an upper-income geography and was open only on Wednesdays from 9:00 a.m. to 1:00 pm. There were 47 branches that were open from 9:00 a.m. to noon on Saturdays. Of the 49 drive-thru facilities, all but one were open Monday through Friday from 9:00 a.m. to 5:00 p.m. and Saturdays from 9:00 a.m. to noon. One drive-thru located in a middle-income geography was open Monday through Friday from noon to 5:00 pm.

BHB opened 7,670 SMART Money checking accounts and 432 Credit Builder accounts in the Milwaukee MSA AA during the evaluation period.

Appleton MSA

To the extent changes have been made, BHB's opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB did not open any branches and closed three branches, all in middle-income geographies. The branch closures resulted from BHB reassessing its delivery services due to changes in usage.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low-and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All but one branch had the same lobby hours of Monday through Friday from 9:00 a.m. to 5:00 pm. Only one branch was open on a Saturday, from 9:00 a.m. to noon. Of the four branches that had drive-thru facilities open Monday through Friday from 9:00 a.m. to 5:00 p.m. and on Saturdays from 9:00 a.m. to noon, none were in low- or moderate-income geographies.

BHB opened 391 SMART Money checking accounts and 29 Credit Builder accounts in the Appleton MSA AA during the evaluation period.

Racine MSA

BHB did not open or close any branches in the Racine MSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low-and moderate-income geographies and/or low- and moderate-income individuals. BHB

maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had drive-thru facilities and were open Monday through Friday from 9:00 a.m. to 5:00 pm, with five locations open Saturdays from 9:00 a.m. to noon. The one branch not open on Saturdays was in a low-income geography that had limited commercial traffic on weekends.

BHB opened 569 SMART Money checking accounts and 49 Credit Builder accounts in the Racine MSA AA during the evaluation period.

Community Development Services

Milwaukee MSA

BHB was a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. During the evaluation period, 25 bank employees conducted 93 financial education events totaling 188 hours in coordination with 25 different organizations. Approximately 1,650 participants attended these events, included financial literacy for adults and students, first-time homebuyer, budgeting seminars, and banking basics targeting primarily low- and moderate-income individuals and families. Leadership was evident by 28 bank employees spending over 1,649 hours participating on boards and committees for 28 different CD organizations. Additionally, 21 employees provided over 309 hours of general qualified volunteer activities.

Examples of CD services in the AA include:

- A bank employee was the board chairman and finance committee member of an organization that assisted women dealing with addictions. The organization provided treatment and other services, such as counseling, therapy, education, relapse prevention, goal setting, mental health services, case management, child and family services, skill building classes, vocational and educational services, and other services. Over 97 percent of the clients served had incomes of \$20,000 or less.
- A bank employee was a loan committee member of an economic development corporation. The organization focused on entrepreneurs who face barriers in accessing traditional financing or resources to obtain economic well-being. The organization provided business and financial education and connected businesses to critical resources. Over 61 percent of the organization's clients were low- or moderate-income individuals.

Appleton MSA

BHB provided a limited level of CD services within the Appleton MSA AA. During the evaluation period, one bank employee conducted a financial education event totaling 5 hours in coordination with an organization. There were 25 participants in attendance at this event. The event included information on steps towards homeownership for low- and moderate-income individuals and families. In addition, another employee spent 20 hours in a leadership role by participating as a board member for an organization that provided funding for housing, utility payments, clothing, food, transportation, and other high priority needs to veterans and their immediate family who needed emergency financial assistance.

Racine MSA

BHB provided a limited level of CD services within the Racine MSA AA. During the evaluation period, two employees conducted a financial education class totaling eight hours in coordination with one organization. Approximately 15 participants attended this event. Another employee spent 11 hours in a leadership role by participating on the board and committees for a local economic development corporation that provided funding to businesses that were too small to obtain financing from standard financial institutions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BHB's performance in the Eau Claire, Green Bay, La Crosse, Oshkosh, and Wausau MSAs and the Non-MSA Wisconsin AAs was consistent with BHB's overall performance under the Service Test in the full-scope AAs. Performance in the Duluth and Madison MSA AAs was good, and in the Fond du Lac, Janesville, and Sheboygan MSA AAs was adequate, which was weaker than BHB's overall performance under the Service Test in the full-scope AAs. The weaker performances were due to poorer branch distributions. Performance in the limited-scope AAs did not alter the Service Test conclusion for the state of Wisconsin.

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2020, to December 31, 2022	
Bank Products Reviewed:	Home mortgage, small business, small farm, 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
MMSAs		
Chicago-Naperville-Elgin, IL-IN-WI MMSA	Full	IL – Cook, DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will IN – Lake, Porter WI – Kenosha
Kansas City, MO-KS MMSA	Full	KS – Johnson, Wyandotte MO – Clay, Jackson, Platte
Minneapolis-St. Paul-Bloomington, MN-WI MMSA	Full	MN – Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Washington WI – Pierce, St. Croix
St. Louis, MO-IL MMSA	Full	IL – St. Clair MO – Jefferson, St. Charles, St. Louis, St. Louis City
States		
Arizona Phoenix-Mesa-Scottsdale, AZ MSA Tucson, AZ MSA Prescott, AZ MSA	Full Full Limited	Maricopa Pima Yavapai
Florida North Port-Sarasota-Bradenton, FL MSA Cape Coral-Fort Myers, FL MSA Naples-Immokalee-Marco Island, FL MSA Punta Gorda, FL MSA Tampa-St. Petersburg-Clearwater, FL MSA West Palm Beach-Boca Raton-Delray Beach, FL MD	Full Limited Limited Limited Limited Limited	Manatee, Sarasota Lee Collier Charlotte Hillsborough Palm Beach
Illinois Rockford, IL MSA	Full	Boone, Winnebago
Indiana Indianapolis-Carmel-Anderson, IN MSA Kokomo, IN MSA Non-MSA Indiana	Full Limited Limited	Boone, Hamilton, Hendricks, Johnson, Madison, Marion, Morgan Howard Rush, Tipton, Wayne

Rating and Assessment Areas	Type of Exam	Other Information
Kansas Non-MSA Kansas	Full	Crawford
Missouri St. Joseph, MO-KS MSA	Full	MO – Andrew, Buchanan
Wisconsin Milwaukee-Waukesha-West Allis, WI MSA Appleton, WI MSA Racine, WI MSA Duluth, MN-WI MSA Eau Claire, WI MSA Fond du Lac, WI MSA Green Bay, WI MSA Janesville-Beloit, WI MSA La Crosse, WI MSA Madison, WI MSA Oshkosh-Neenah, WI MSA Sheboygan, WI MSA Wausau, WI MSA Non-MSA Wisconsin	Full Full Full Limited Limited Limited Limited Limited Limited Limited Limited Limited Limited Limited Limited	Milwaukee, Ozaukee, Washington, Waukesha Calumet, Outagamie Racine WI – Douglas Chippewa, Eau Claire Fond du Lac Brown, Kewaunee, Oconto Rock La Crosse Columbia, Dane, Iowa Winnebago Sheboygan Marathon, Lincoln Adams, Ashland, Clark, Dodge, Dunn, Grant, Jefferson, Juneau, Langlade, Manitowoc, Marinette, Marquette, Oneida, Portage, Richland, Sauk, Shawano, Vernon, Vilas, Walworth, Waupaca, Waushara, Wood

Appendix B: Summary of MMSA and State Ratings

RATINGS BMO Harris Bank N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/MMSA Rating
BMO Harris Bank N.A.	High Satisfactory	Outstanding	Outstanding	Outstanding
MMSA or State:				
Chicago MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Kansas City MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Minneapolis MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
St. Louis MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Arizona	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
Illinois	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kansas	Outstanding	Outstanding	Outstanding	Outstanding
Missouri	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wisconsin	Outstanding	Outstanding	Outstanding	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending: 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/AA.

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.

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

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower

distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

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

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

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 (MD): 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 (MSA): 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.

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 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/AA. 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 AA.

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. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 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 \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Chicago	9,230	1,818,433	100.0	504,044	4.5	1.5	3.1	17.6	8.5	13.3	35.5	32.0	33.9	42.3	57.9	49.6	0.1	0.1	0.1
Total	9,230	1,818,433	100.0	504,044	4.5	1.5	3.1	17.6	8.5	13.3	35.5	32.0	33.9	42.3	57.9	49.6	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Chicago	4,832	970,852	100.0	245,181	4.6	1.9	4.2	18.1	11.2	16.6	37.6	35.7	37.5	39.3	51.0	41.4	0.3	0.2	0.3
Total	4,832	970,852	100.0	245,181	4.6	1.9	4.2	18.1	11.2	16.6	37.6	35.7	37.5	39.3	51.0	41.4	0.3	0.2	0.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Chicago	9,230	1,818,433	100.0	504,044	23.4	9.2	6.4	16.4	16.8	16.3	18.7	22.3	21.1	41.5	44.6	39.7	0.0	7.1	16.5	
Total	9,230	1,818,433	100.0	504,044	23.4	9.2	6.4	16.4	16.8	16.3	18.7	22.3	21.1	41.5	44.6	39.7	0.0	7.1	16.5	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Chicago	4,832	970,852	100.0	245,181	22.9	13.8	10.0	16.7	20.9	21.3	19.4	24.1	21.0	41.0	36.8	30.8	0.0	4.4	17.0
Total	4,832	970,852	100.0	245,181	22.9	13.8	10.0	16.7	20.9	21.3	19.4	24.1	21.0	41.0	36.8	30.8	0.0	4.4	17.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Chicago	26,647	2,205,484	100.0	315,020	6.1	3.7	7.0	16.6	13.7	18.8	29.4	33.4	30.7	47.5	49.0	43.1	0.4	0.2	0.5
Total	26,647	2,205,484	100.0	315,020	6.1	3.7	7.0	16.6	13.7	18.8	29.4	33.4	30.7	47.5	49.0	43.1	0.4	0.2	0.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Chicago	4,714	496,295	100.0	--	6.1	3.9	--	17.0	18.5	--	32.1	39.9	--	44.3	37.3	--	0.6	0.4	--
Total	4,714	496,295	100.0	--	6.1	3.9	--	17.0	18.5	--	32.1	39.9	--	44.3	37.3	--	0.6	0.4	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Chicago	26,647	2,205,484	100.0	315,020	86.9	28.5	42.3	4.9	23.2	8.2	48.2
Total	26,647	2,205,484	100.0	315,020	86.9	28.5	42.3	4.9	23.2	8.2	48.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Chicago	4,714	496,295	100.0	--	89.6	48.9	--	3.8	35.6	6.6	15.5
Total	4,714	496,295	100.0	--	89.6	48.9	--	3.8	35.6	6.6	15.5
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Chicago	99	4,304	100.0	1,233	3.7	1.0	0.8	15.1	4.0	4.2	38.7	50.5	65.2	42.3	44.4	29.5	0.1	0.0	0.3
Total	99	4,304	100.0	1,233	3.7	1.0	0.8	15.1	4.0	4.2	38.7	50.5	65.2	42.3	44.4	29.5	0.1	0.0	0.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Chicago	16	434	100.0	--	4.3	6.3	--	17.5	18.8	--	38.6	50.0	--	39.3	25.0	--	0.4	0.0	--
Total	16	434	100.0	--	4.3	6.3	--	17.5	18.8	--	38.6	50.0	--	39.3	25.0	--	0.4	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Chicago	99	4,304	100.0	1,233	94.7	38.4	60.2	3.1	6.1	2.2	55.6
Total	99	4,304	100.0	1,233	94.7	38.4	60.2	3.1	6.1	2.2	55.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Chicago	16	434	100.0	--	95.6	87.5	--	2.6	12.5	1.9	0.0
Total	16	434	100.0	--	95.6	87.5	--	2.6	12.5	1.9	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Kansas City	283	63,017	100.0	109,915	6.6	4.2	3.3	18.0	9.9	14.9	35.5	24.7	34.4	39.7	60.8	47.2	0.2	0.4	0.2
Total	283	63,017	100.0	109,915	6.6	4.2	3.3	18.0	9.9	14.9	35.5	24.7	34.4	39.7	60.8	47.2	0.2	0.4	0.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Kansas City	173	38,347	100.0	60,653	4.9	4.6	4.2	20.5	17.3	20.8	37.4	29.5	36.8	36.7	48.6	37.7	0.4	0.0	0.5
Total	173	38,347	100.0	60,653	4.9	4.6	4.2	20.5	17.3	20.8	37.4	29.5	36.8	36.7	48.6	37.7	0.4	0.0	0.5
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Kansas City	283	63,017	100.0	109,915	21.4	7.1	7.4	17.2	20.8	17.6	20.0	25.1	20.1	41.4	42.0	35.2	0.0	4.9	19.7
Total	283	63,017	100.0	109,915	21.4	7.1	7.4	17.2	20.8	17.6	20.0	25.1	20.1	41.4	42.0	35.2	0.0	4.9	19.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Kansas City	173	38,347	100.0	60,653	20.3	12.7	9.4	17.3	17.3	19.3	21.4	23.1	20.4	41.1	42.8	33.1	0.0	4.0	17.7
Total	173	38,347	100.0	60,653	20.3	12.7	9.4	17.3	17.3	19.3	21.4	23.1	20.4	41.1	42.8	33.1	0.0	4.0	17.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Kansas City	1,065	95,566	100.0	45,698	7.7	8.1	7.3	18.6	12.1	18.5	31.7	25.3	29.9	40.0	32.1	42.0	2.0	22.4	2.4
Total	1,065	95,566	100.0	45,698	7.7	8.1	7.3	18.6	12.1	18.5	31.7	25.3	29.9	40.0	32.1	42.0	2.0	22.4	2.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Kansas City	196	22,433	100.0	--	6.3	8.2	--	21.4	20.4	--	33.2	28.1	--	36.2	38.3	--	3.0	5.1	--
Total	196	22,433	100.0	--	6.3	8.2	--	21.4	20.4	--	33.2	28.1	--	36.2	38.3	--	3.0	5.1	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Kansas City	1,065	95,566	100.0	45,698	85.3	23.5	46.7	5.0	37.6	9.7	39.0
Total	1,065	95,566	100.0	45,698	85.3	23.5	46.7	5.0	37.6	9.7	39.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Kansas City	196	22,433	100.0	--	89.7	61.7	--	3.4	28.1	7.0	10.2
Total	196	22,433	100.0	--	89.7	61.7	--	3.4	28.1	7.0	10.2
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Kansas City	5	412	100.0	435	5.9	0.0	1.8	17.0	0.0	4.8	35.2	40.0	49.4	41.5	60.0	43.2	0.4	0.0	0.7
Total	5	412	100.0	435	5.9	0.0	1.8	17.0	0.0	4.8	35.2	40.0	49.4	41.5	60.0	43.2	0.4	0.0	0.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Kansas City	5	412	100.0	435	95.9	40.0	52.6	2.3	40.0	1.8	20.0
Total	5	412	100.0	435	95.9	40.0	52.6	2.3	40.0	1.8	20.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Minneapolis	958	221,971	100.0	219,688	2.3	1.4	2.5	15.5	7.7	14.4	46.5	37.7	45.3	35.6	53.2	37.8	0.1	0.0	0.1
Total	958	221,971	100.0	219,688	2.3	1.4	2.5	15.5	7.7	14.4	46.5	37.7	45.3	35.6	53.2	37.8	0.1	0.0	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Minneapolis	457	166,061	100.0	107,742	2.5	1.8	3.2	17.0	12.0	17.8	46.9	37.0	45.1	33.6	49.2	33.7	0.1	0.0	0.2
Total	457	166,061	100.0	107,742	2.5	1.8	3.2	17.0	12.0	17.8	46.9	37.0	45.1	33.6	49.2	33.7	0.1	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis	958	221,971	100.0	219,688	20.3	9.5	8.7	17.1	17.7	20.8	21.8	19.4	21.5	40.7	47.6	32.3	0.0	5.7	16.7
Total	958	221,971	100.0	219,688	20.3	9.5	8.7	17.1	17.7	20.8	21.8	19.4	21.5	40.7	47.6	32.3	0.0	5.7	16.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis	457	166,061	100.0	107,742	19.6	13.3	11.1	17.9	21.7	23.4	22.5	21.9	21.5	40.0	39.2	28.2	0.0	3.9	15.9
Total	457	166,061	100.0	107,742	19.6	13.3	11.1	17.9	21.7	23.4	22.5	21.9	21.5	40.0	39.2	28.2	0.0	3.9	15.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Minneapolis	2,000	198,511	100.0	83,397	5.2	6.7	5.1	17.5	16.7	16.8	42.7	40.6	42.7	34.2	36.0	35.0	0.3	0.1	0.5
Total	2,000	198,511	100.0	83,397	5.2	6.7	5.1	17.5	16.7	16.8	42.7	40.6	42.7	34.2	36.0	35.0	0.3	0.1	0.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis	429	46,784	100.0	--	4.3	4.0	--	18.3	20.3	--	41.2	53.1	--	35.5	21.2	--	0.8	1.4	--
Total	429	46,784	100.0	--	4.3	4.0	--	18.3	20.3	--	41.2	53.1	--	35.5	21.2	--	0.8	1.4	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Minneapolis	2,000	198,511	100.0	83,397	88.0	26.8	50.2	4.4	14.2	7.5	59.0
Total	2,000	198,511	100.0	83,397	88.0	26.8	50.2	4.4	14.2	7.5	59.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Minneapolis	429	46,784	100.0	--	89.5	39.9	--	3.7	49.7	6.8	10.5
Total	429	46,784	100.0	--	89.5	39.9	--	3.7	49.7	6.8	10.5
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-21	
	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis	14	563	100.0	738	2.0	0.0	0.7	12.8	0.0	6.5	50.6	57.1	65.6	34.5	42.9	27.1	0.1	0.0	0.2
Total	14	563	100.0	738	2.0	0.0	0.7	12.8	0.0	6.5	50.6	57.1	65.6	34.5	42.9	27.1	0.1	0.0	0.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis	1	8	100.0	--	1.8	0.0	--	15.9	0.0	--	47.9	100.0	--	34.2	0.0		0.2	0.0	--
Total	1	8	100.0	--	1.8	0.0	--	15.9	0.0	--	47.9	100.0	--	34.2	0.0		0.2	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Minneapolis	14	563	100.0	738	96.2	35.7	53.6	2.2	42.9	1.6	21.4
Total	14	563	100.0	738	96.2	35.7	53.6	2.2	42.9	1.6	21.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Minneapolis	1	8	100.0	--	96.4	0.0	--	2.0	100.0	1.6	0.0
Total	1	8	100.0	--	96.4	0.0	--	2.0	100.0	1.6	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21	
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	
Full-Scope:																				
St. Louis	408	91,105	100.0	142,639	5.8	0.7	1.8	16.8	9.3	12.0	36.9	33.1	38.0	40.4	56.4	48.1	0.1	0.5	0.2	
Total	408	91,105	100.0	142,639	5.8	0.7	1.8	16.8	9.3	12.0	36.9	33.1	38.0	40.4	56.4	48.1	0.1	0.5	0.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
St. Louis	199	39,690	100.0	72,998	5.1	1.0	3.2	15.2	9.0	14.0	39.3	36.2	41.5	40.1	53.8	41.1	0.2	0.0	0.2
Total	199	39,690	100.0	72,998	5.1	1.0	3.2	15.2	9.0	14.0	39.3	36.2	41.5	40.1	53.8	41.1	0.2	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
St. Louis	408	91,105	100.0	142,639	21.7	8.6	7.7	16.8	22.3	16.6	19.4	17.6	19.0	42.2	45.3	33.4	0.0	6.1	23.3	
Total	408	91,105	100.0	142,639	21.7	8.6	7.7	16.8	22.3	16.6	19.4	17.6	19.0	42.2	45.3	33.4	0.0	6.1	23.3	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis	199	39,690	100.0	72,998	20.4	16.1	10.6	17.5	23.1	19.5	20.7	16.6	19.5	41.4	39.7	30.1	0.0	4.5	20.3
Total	199	39,690	100.0	72,998	20.4	16.1	10.6	17.5	23.1	19.5	20.7	16.6	19.5	41.4	39.7	30.1	0.0	4.5	20.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
St. Louis	879	86,043	100.0	57,381	7.4	5.0	6.5	18.2	20.1	17.0	31.4	36.1	32.2	42.0	37.3	43.1	1.0	1.5	1.2
Total	879	86,043	100.0	57,381	7.4	5.0	6.5	18.2	20.1	17.0	31.4	36.1	32.2	42.0	37.3	43.1	1.0	1.5	1.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis	176	15,877	100.0	--	7.6	8.0	--	14.5	17.0	--	32.9	36.9	--	44.2	38.1	--	0.8	0.0	--
Total	176	15,877	100.0	--	7.6	8.0	--	14.5	17.0	--	32.9	36.9	--	44.2	38.1	--	0.8	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
St. Louis	879	86,043	100.0	57,381	85.2	28.6	50.2	5.3	22.8	9.5	48.7
Total	879	86,043	100.0	57,381	85.2	28.6	50.2	5.3	22.8	9.5	48.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
St. Louis	176	15,877	100.0	--	91.8	52.3	--	2.8	26.7	5.4	21.0
Total	176	15,877	100.0	--	91.8	52.3	--	2.8	26.7	5.4	21.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis	5	536	100.0	371	3.8	0.0	1.6	15.2	20.0	11.1	39.6	20.0	45.0	40.8	60.0	42.0	0.5	0.0	0.3
Total	5	536	100.0	371	3.8	0.0	1.6	15.2	20.0	11.1	39.6	20.0	45.0	40.8	60.0	42.0	0.5	0.0	0.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
St. Louis	5	536	100.0	371	95.8	80.0	57.5	2.6	0.0	1.6	20.0
Total	5	536	100.0	371	95.8	80.0	57.5	2.6	0.0	1.6	20.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Phoenix	1,798	515,998	86.7	382,324	4.6	1.1	3.6	18.8	7.1	14.4	34.7	27.8	34.9	41.9	64.0	46.6	0.0	0.2	0.5
Tucson	173	38,552	8.3	74,042	4.7	1.7	3.2	21.4	7.5	15.5	32.9	26.0	31.9	41.0	64.7	49.4	0.0	0.0	0.0
Limited-Scope:																			
Prescott	122	29,492	5.8	19,882	0.0	0.0	0.0	18.7	9.0	16.4	61.2	68.9	64.7	20.1	22.1	18.9	0.0	0.0	0.0
Total	2,093	584,042	100.0	476,248	4.3	1.1	3.4	19.4	7.2	14.7	35.8	30.0	35.7	40.5	61.6	45.8	0.0	0.1	0.4
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Phoenix	1,158	605,152	85.2	183,103	2.6	2.2	2.2	20.6	10.0	18.1	34.7	24.1	35.8	41.9	63.6	43.7	0.1	0.1	0.1
Tucson	120	29,160	8.8	37,314	2.0	1.7	1.9	26.3	15.8	22.4	30.5	15.8	30.3	40.4	65.8	45.0	0.8	0.8	0.5
Limited-Scope:																			
Prescott	81	19,148	6.0	10,837	0.0	0.0	0.0	16.9	9.9	16.9	67.3	61.7	68.8	15.8	28.4	14.3	0.0	0.0	0.0
Total	1,359	653,460	100.0	231,254	2.4	2.1	2.1	21.6	10.5	18.7	35.6	25.6	36.5	40.2	61.7	42.6	0.3	0.1	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix	1,798	515,998	85.9	382,324	21.8	7.6	5.2	16.9	13.3	16.0	19.2	17.9	20.1	42.2	55.1	40.2	0.0	6.2	18.6
Tucson	173	38,552	8.3	74,042	22.2	12.7	5.1	17.3	8.7	14.2	19.1	26.6	19.4	41.4	49.1	36.2	0.0	2.9	25.1
Limited-Scope:																			
Prescott	122	29,492	5.8	19,882	18.8	5.7	4.3	19.3	13.9	14.2	22.4	29.5	18.8	39.6	47.5	42.7	0.0	3.3	20.0
Total	2,093	584,042	100.0	476,248	21.7	7.9	5.1	17.1	13.0	15.6	19.3	19.3	20.0	41.9	54.1	39.6	0.0	5.7	19.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix	1,158	605,152	85.2	183,103	20.4	7.3	6.8	17.9	11.8	15.5	20.0	17.8	20.5	41.7	58.4	40.4	0.0	4.7	16.7
Tucson	120	29,160	8.8	37,314	21.9	9.2	8.2	17.4	19.2	17.0	19.6	13.3	22.1	41.2	54.2	33.2	0.0	4.2	19.6
Limited-Scope:																			
Prescott	81	19,148	6.0	10,837	20.0	9.9	7.8	18.1	21.0	14.4	23.2	22.2	21.4	38.8	40.7	41.0	0.0	6.2	15.4
Total	1,359	653,460	100.0	231,254	20.6	7.7	7.1	17.8	13.0	15.7	20.1	17.7	20.8	41.5	57.0	39.2	0.0	4.7	17.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
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	
Full-Scope:																				
Phoenix	2,609	227,365	84.4	133,594	7.0	11.9	6.5	15.2	16.7	16.1	29.5	24.0	27.5	47.8	47.1	48.6	0.5	0.3	1.3	
Tucson	327	23,628	10.6	20,604	6.0	5.5	6.9	22.1	24.8	23.9	28.5	31.5	28.5	42.4	38.2	38.6	1.0	0.0	2.1	
Limited-Scope:																				
Prescott	157	9,927	5.1	6,471	0.0	0.0	0.0	21.2	12.1	22.2	51.5	61.8	50.1	27.3	26.1	24.2	0.0	0.0	3.5	
Total	3,093	260,920	100.0	160,669	6.6	10.6	6.3	16.3	17.3	17.3	30.2	26.7	28.6	46.3	45.1	46.3	0.6	0.3	1.5	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix	606	50,200	86.8	--	4.0	8.4	--	18.3	24.8	--	28.2	28.4	--	48.9	38.1	--	0.6	0.3	--
Tucson	53	6,861	7.6	--	2.1	3.8	--	25.3	26.4	--	26.4	37.7	--	44.0	32.1	--	2.1	0.0	--
Limited-Scope:																			
Prescott	39	1,221	5.6	--	0.0	0.0	--	15.9	15.4	--	63.8	71.8	--	20.4	12.8	--	0.0	0.0	--
Total	698	58,282	100.0	--	3.6	7.6	--	19.1	24.4	--	29.2	31.5	--	47.3	36.2	--	0.7	0.3	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Phoenix	2,609	227,365	84.4	133,594	92.1	29.3	47.8	1.8	15.4	6.1	55.3
Tucson	327	23,628	10.6	20,604	90.2	38.2	48.6	2.2	16.5	7.5	45.3
Limited-Scope:											
Prescott	157	9,927	5.1	6,471	91.8	21.0	54.5	1.9	10.2	6.3	68.8
Total	3,093	260,920	100.0	160,669	91.8	29.8	48.2	1.9	15.3	6.3	54.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Phoenix	606	50,200	86.8	--	93.0	56.6	--	1.5	37.3	5.5	6.1
Tucson	53	6,861	7.6	--	91.6	45.3	--	1.8	34.0	6.6	20.8
Limited-Scope:											
Prescott	39	1,221	5.6	--	92.6	82.1	--	1.6	5.1	5.8	12.8
Total	698	58,282	100.0	--	92.8	57.2	--	1.6	35.2	5.6	7.6
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix	24	2,142	85.7	475	7.2	4.2	1.7	18.5	20.8	14.1	28.9	4.2	27.4	45.1	70.8	53.1	0.3	0.0	3.7
Tucson	3	228	10.7	92	5.9	0.0	1.1	21.6	0.0	10.6	33.0	66.7	37.2	39.2	33.3	48.9	0.3	0.0	2.1
Limited-Scope:																			
Prescott	1	19	3.6	88	0.0	0.0	0.0	20.7	100.0	17.8	55.1	0.0	39.6	24.2	0.0	29.7	0.0	0.0	12.9
Total	28	2,389	100.0	655	6.6	3.6	1.3	19.1	21.4	14.2	31.1	10.7	30.6	42.9	64.3	49.0	0.3	0.0	4.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix	3	500	75.0	--	4.4	0.0	--	20.3	0.0	--	29.9	0.0	--	44.7	100.0	--	0.7	0.0	--
Tucson	1	4	25.0	--	2.7	0.0	--	29.2	100.0	--	27.8	0.0	--	39.5	0.0	--	0.8	0.0	--
Limited-Scope:																			
Prescott	0	0	0.0	--	0.0	0.0	--	16.8	0.0	--	67.8	0.0	--	15.5	0.0	--	0.0	0.0	--
Total	4	504	100.0	--	3.9	0.0	--	21.5	25.0	--	31.9	0.0	--	42.1	75.0	--	0.7	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Phoenix	24	2,142	85.7	475	96.7	25.0	50.2	2.0	20.8	1.3	54.2
Tucson	3	228	10.7	92	97.3	0.0	45.7	1.7	0.0	1.0	100.0
Limited-Scope:											
Prescott	1	19	3.6	88	97.7	0.0	44.6	1.5	0.0	0.8	100.0
Total	28	2,389	100.0	655	96.8	21.4	48.7	1.9	17.9	1.3	60.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Phoenix	3	500	75.0	--	97.0	66.7	--	1.7	33.3	1.3	0.0
Tucson	1	4	25.0	--	97.5	100.0	--	1.5	0.0	1.0	0.0
Limited-Scope:											
Prescott	0	0	0.0	--	97.8	0.0	--	1.3	0.0	0.9	0.0
Total	4	504	100.0	--	97.1	75.0	--	1.6	25.0	1.2	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Sarasota	308	118,146	46.8	59,278	1.0	0.6	0.4	18.3	10.4	12.7	50.7	43.5	44.2	29.9	45.5	42.7	0.0	0.0	0.0
Limited-Scope:																			
Cape Coral	95	38,540	14.4	55,200	2.1	0.0	1.4	18.6	4.2	19.6	44.2	22.1	44.7	35.1	73.7	34.3	0.0	0.0	0.0
Naples	122	108,872	18.5	27,564	2.3	0.8	1.2	16.3	13.9	14.3	41.3	27.9	42.4	40.1	57.4	42.1	0.0	0.0	0.0
Punta Gorda	21	4,145	3.2	15,335	0.0	0.0	0.0	10.7	4.8	13.8	70.6	71.4	67.2	18.6	23.8	19.0	0.0	0.0	0.0
Tampa	56	12,597	8.5	82,535	3.3	0.0	2.8	17.8	10.7	14.4	31.8	23.2	30.1	46.9	66.1	52.7	0.2	0.0	0.1
West Palm Beach	56	45,217	8.5	78,174	3.1	0.0	2.4	23.3	14.3	19.5	32.7	23.2	34.1	40.6	62.5	43.8	0.2	0.0	0.2
Total	658	327,517	100.0	318,086	2.4	0.5	1.7	19.3	10.3	16.2	40.0	35.0	39.1	38.2	54.3	42.9	0.1	0.0	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Sarasota	163	52,038	42.4	37,234	1.2	0.6	0.5	18.1	13.5	14.9	46.7	39.3	41.9	33.8	46.0	42.0	0.2	0.6	0.7
Limited-Scope:																			
Cape Coral	48	19,237	12.5	34,892	1.0	0.0	0.9	17.1	6.3	18.2	49.6	39.6	50.2	32.1	54.2	30.2	0.2	0.0	0.6
Naples	76	58,972	19.8	16,040	2.3	1.3	1.1	17.4	6.6	18.5	40.7	30.3	44.8	38.4	61.8	34.4	1.2	0.0	1.2
Punta Gorda	11	2,111	2.9	9,989	0.0	0.0	0.0	14.8	18.2	12.4	67.2	72.7	68.3	18.0	9.1	19.3	0.0	0.0	0.0
Tampa	45	12,642	11.7	51,151	2.0	2.2	2.1	22.1	6.7	20.0	33.9	20.0	34.5	41.8	71.1	43.2	0.2	0.0	0.2
West Palm Beach	41	63,108	10.7	47,953	3.3	2.4	2.8	22.1	7.3	22.3	34.7	17.1	34.9	39.1	70.7	39.5	0.8	2.4	0.6
Total	384	208,108	100.0	197,259	2.0	1.0	1.6	19.8	9.9	18.8	41.2	33.9	41.3	36.6	54.7	37.8	0.4	0.5	0.5
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Sarasota	308	118,146	46.8	59,278	19.4	8.8	4.8	19.1	16.6	14.8	21.0	14.9	20.2	40.5	52.3	46.0	0.0	7.5	14.2	
Limited-Scope:																				
Cape Coral	95	38,540	14.4	55,200	20.7	6.3	3.8	18.5	10.5	15.4	19.7	18.9	19.9	41.1	55.8	44.3	0.0	8.4	16.6	
Naples	122	108,872	18.5	27,564	20.8	4.9	3.2	17.7	8.2	12.4	19.3	9.8	17.7	42.2	71.3	53.6	0.0	5.7	13.0	
Punta Gorda	21	4,145	3.2	15,335	17.3	9.5	4.8	20.7	19.0	15.0	21.8	23.8	20.8	40.2	47.6	43.1	0.0	0.0	16.3	
Tampa	56	12,597	9.3	82,535	21.9	3.6	3.3	16.8	16.1	13.5	17.7	8.9	19.4	43.6	62.5	43.4	0.0	8.9	20.4	
West Palm Beach	56	45,217	8.5	78,174	22.8	3.6	3.9	17.3	8.9	13.5	17.8	3.6	18.7	42.1	62.5	48.2	0.0	21.4	15.8	
Total	658	327,517	100.0	318,086	21.3	6.8	3.9	17.8	13.5	14.0	18.9	13.4	19.4	42.0	57.9	46.1	0.0	8.4	16.6	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Sarasota	163	52,038	42.4	37,234	18.8	11.0	5.7	19.6	20.2	15.1	20.4	16.6	20.8	41.2	44.2	45.0	0.0	8.0	13.4
Limited-Scope:																			
Cape Coral	48	19,237	12.5	34,892	19.3	10.4	4.6	19.0	12.5	16.1	20.8	20.8	21.7	40.9	52.1	42.7	0.0	4.2	14.9
Naples	76	58,972	19.8	16,040	21.9	9.2	4.2	18.0	6.6	12.0	19.6	9.2	18.6	40.5	65.8	52.3	0.0	9.2	12.9
Punta Gorda	11	2,111	2.9	9,989	16.7	9.1	4.7	20.4	9.1	15.0	22.8	0.0	21.7	40.1	72.7	43.9	0.0	9.1	14.7
Tampa	45	12,642	11.7	51,151	21.2	6.7	3.8	16.9	11.1	13.4	18.7	11.1	21.7	43.2	51.1	45.2	0.0	20.0	15.8
West Palm Beach	41	63,108	10.7	47,953	22.1	2.4	4.7	17.5	4.9	13.3	18.6	4.9	18.4	41.8	75.6	48.8	0.0	12.2	14.7
Total	384	208,108	100.0	197,259	20.6	9.1	4.6	18.1	13.5	14.1	19.5	13.3	20.5	41.8	54.4	46.1	0.0	9.6	14.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
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	
Full-Scope:																				
Sarasota	588	45,008	32.5	31,452	1.4	2.9	1.2	19.6	25.2	17.5	43.6	43.5	42.6	35.4	28.4	38.3	0.0	0.0	0.4	
Limited-Scope:																				
Cape Coral	255	25,907	14.1	27,526	2.9	2.4	2.5	22.8	56.9	23.7	41.0	24.7	40.5	33.1	16.1	32.8	0.1	0.0	0.6	
Naples	159	17,436	8.8	17,665	2.8	2.5	3.0	14.3	7.5	12.7	37.9	32.7	39.7	45.1	57.2	44.3	0.0	0.0	0.3	
Punta Gorda	40	4,952	2.2	5,297	0.0	0.0	0.0	16.2	17.5	16.4	65.6	77.5	66.5	18.1	5.0	16.6	0.0	0.0	0.5	
Tampa	597	73,310	32.9	53,633	6.6	36.7	6.9	19.5	22.1	20.4	27.7	20.3	27.6	45.6	20.9	44.3	0.6	0.0	0.8	
West Palm Beach	173	19,260	9.5	85,459	5.3	17.3	5.8	21.6	24.9	23.3	29.3	30.1	29.3	43.1	27.2	40.8	0.6	0.6	0.8	
Total	1,812	185,873	100.0	221,032	4.4	15.2	4.6	20.2	26.9	20.8	34.3	31.7	33.9	40.8	26.1	40.0	0.4	0.1	0.7	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Sarasota	96	5,696	23.0	--	1.3	1.0	--	15.8	28.1	--	46.3	44.8	--	36.3	26.0	--	0.3	0.0	--	
Limited-Scope:																				
Cape Coral	39	5,034	9.3	--	2.1	5.1	--	21.9	28.2	--	46.1	51.3	--	29.2	15.4	--	0.6	0.0	--	
Naples	36	4,488	8.6	--	2.6	8.3	--	15.3	19.4	--	41.9	52.8	--	39.2	16.7	--	1.1	2.8	--	
Punta Gorda	7	373	1.7	--	0.0	0.0	--	17.3	28.6	--	64.3	71.4	--	18.4	0.0	--	0.0	0.0	--	
Tampa	203	26,015	48.6	--	5.1	63.5	--	22.4	14.3	--	28.8	13.3	--	42.1	8.9	--	1.5	0.0	--	
West Palm Beach	37	3,437	8.9	--	3.9	16.2	--	22.3	21.6	--	30.0	37.8	--	41.5	24.3	--	2.3	0.0	--	
Total	418	45,043	100.0	--	3.4	33.7	--	20.6	20.1	--	36.1	30.6	--	38.5	15.3	--	1.4	0.2	--	
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Sarasota	588	45,008	32.5	31,452	93.1	24.3	49.9	2.1	9.7	4.8	66.0
Limited-Scope:											
Cape Coral	255	25,907	14.1	27,526	93.2	34.5	45.8	2.0	47.1	4.8	18.4
Naples	159	17,436	8.8	17,665	93.5	30.8	46.8	2.0	25.2	4.4	44.0
Punta Gorda	40	4,952	2.2	5,297	93.2	17.5	48.5	1.8	7.5	4.9	75.0
Tampa	597	73,310	32.9	53,633	92.7	26.1	44.3	2.2	52.6	5.1	21.3
West Palm Beach	173	19,260	9.5	85,459	93.9	49.7	43.6	2.0	19.1	4.2	31.2
Total	1,812	185,873	100.0	221,032	93.3	29.2	45.3	2.1	31.3	4.6	39.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Sarasota	96	5,696	23.0	--	93.8	64.6	--	1.8	24.0	4.4	11.5
Limited-Scope:											
Cape Coral	39	5,034	9.3	--	93.9	64.1	--	1.7	15.4	4.4	20.5
Naples	36	4,488	8.6	--	94.3	44.4	--	1.7	38.9	4.0	16.7
Punta Gorda	7	373	1.7	--	93.9	42.9	--	1.5	42.9	4.6	14.3
Tampa	203	26,015	48.6	--	93.6	18.7	--	1.8	80.8	4.6	0.5
West Palm Beach	37	3,437	8.9	--	94.4	78.4	--	1.7	16.2	3.9	5.4
Total	418	45,043	100.0	--	94.0	41.4	--	1.7	51.7	4.3	6.9
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Sarasota	9	291	17.6	114	2.3	0.0	0.0	20.2	0.0	9.8	44.1	22.2	33.0	33.3	77.8	55.4	0.0	0.0	1.8	
Limited-Scope:																				
Cape Coral	16	1,046	31.4	103	3.2	0.0	1.1	26.6	31.3	18.5	46.4	50.0	45.7	23.8	18.8	32.6	0.0	0.0	2.2	
Naples	8	467	15.7	60	5.6	12.5	6.9	21.3	12.5	25.9	42.9	62.5	36.2	30.2	12.5	27.6	0.0	0.0	3.4	
Punta Gorda	3	193	5.9	28	0.0	0.0	0.0	25.5	0.0	42.3	62.8	0.0	23.1	11.7	100.0	34.6	0.0	0.0	0.0	
Tampa	3	202	5.9	155	4.6	0.0	1.9	19.7	0.0	18.1	34.0	0.0	36.1	41.4	100.0	42.6	0.3	0.0	1.3	
West Palm Beach	12	740	23.5	289	6.1	0.0	2.8	23.3	16.7	11.3	32.7	33.3	34.2	37.5	50.0	51.8	0.4	0.0	0.0	
Total	51	2,939	100.0	749	4.3	2.0	2.2	22.4	15.7	15.7	39.3	37.3	35.6	33.8	45.1	45.4	0.2	0.0	1.1	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Sarasota	2	35	33.3	--	2.0	0.0	--	20.7	0.0	--	45.8	50.0	--	31.1	50.0	--	0.4	0.0	--
Limited-Scope:																			
Cape Coral	1	70	16.7	--	1.9	0.0	--	22.2	100.0	--	49.4	0.0	--	26.3	0.0	--	0.2	0.0	--
Naples	2	145	33.3	--	7.7	0.0	--	26.3	0.0	--	41.6	100.0	--	23.8	0.0	--	0.7	0.0	--
Punta Gorda	0	0	0.0	--	0.0	0.0	--	20.4	0.0	--	59.9	0.0	--	19.7	0.0	--	0.0	0.0	--
Tampa	0	0	0.0	--	3.7	0.0	--	23.9	0.0	--	35.9	0.0	--	36.1	0.0	--	0.4	0.0	--
West Palm Beach	1	204	16.7	--	5.1	0.0	--	23.6	0.0	--	33.7	0.0	--	36.9	100.0	--	0.8	0.0	--
Total	6	454	100.0	--	3.7	0.0	--	23.0	16.7	--	40.7	50.0	--	32.2	33.3	--	0.5	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Sarasota	9	291	17.6	114	97.2	66.7	65.2	1.7	11.1	1.1	22.2
Limited-Scope:											
Cape Coral	16	1,046	31.4	103	97.7	81.3	60.9	1.3	12.5	1.0	6.3
Naples	8	467	15.7	60	96.2	50.0	69.0	2.6	37.5	1.2	12.5
Punta Gorda	3	193	5.9	28	98.3	100.0	80.8	0.4	0.0	1.3	0.0
Tampa	3	202	5.9	155	96.9	33.3	56.1	2.0	66.7	1.1	0.0
West Palm Beach	12	740	23.5	289	97.2	25.0	63.7	1.8	33.3	1.0	41.7
Total	51	2,939	100.0	749	97.2	58.8	63.0	1.7	23.5	1.1	17.6
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Sarasota	2	35	33.3	--	97.3	100.0	--	1.5	0.0	1.1	0.0
Limited-Scope:											
Cape Coral	1	70	16.7	--	98.0	100.0	--	1.1	0.0	1.0	0.0
Naples	2	145	33.3	--	96.6	100.0	--	2.4	0.0	1.1	0.0
Punta Gorda	0	0	0.0	--	98.5	0.0	--	0.2	0.0	1.3	0.0
Tampa	0	0	0.0	--	97.1	0.0	--	1.7	0.0	1.2	0.0
West Palm Beach	1	204	16.7	--	97.3	0.0	--	1.6	100.0	1.1	0.0
Total	6	454	100.0	--	97.4	83.3	--	1.5	16.7	1.1	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Rockford	327	32,818	100.0	14,535	5.1	2.4	2.3	15.9	10.7	12.6	33.5	28.4	35.2	45.4	58.1	49.8	0.0	0.3	0.1
Total	327	32,818	100.0	14,535	5.1	2.4	2.3	15.9	10.7	12.6	33.5	28.4	35.2	45.4	58.1	49.8	0.0	0.3	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Rockford	170	14,632	100.0	8,904	3.1	0.6	2.7	21.3	14.1	21.2	34.5	36.5	37.6	40.9	48.8	38.3	0.3	0.0	0.2
Total	170	14,632	100.0	8,904	3.1	0.6	2.7	21.3	14.1	21.2	34.5	36.5	37.6	40.9	48.8	38.3	0.3	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Rockford	327	32,818	100.0	14,535	21.9	13.2	10.0	17.0	24.5	19.7	20.4	25.1	22.2	40.7	34.6	28.2	0.0	2.8	19.9	
Total	327	32,818	100.0	14,535	21.9	13.2	10.0	17.0	24.5	19.7	20.4	25.1	22.2	40.7	34.6	28.2	0.0	2.8	19.9	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Rockford	170	14,632	100.0	8,904	21.8	19.4	12.2	17.2	25.3	22.5	19.5	25.9	22.4	41.5	25.3	25.6	0.0	4.1	17.4
Total	170	14,632	100.0	8,904	21.8	19.4	12.2	17.2	25.3	22.5	19.5	25.9	22.4	41.5	25.3	25.6	0.0	4.1	17.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Rockford	471	27,820	100.0	6,042	9.2	11.7	8.8	15.8	15.1	16.1	28.6	30.6	29.0	44.1	39.7	43.1	2.3	3.0	2.9
Total	471	27,820	100.0	6,042	9.2	11.7	8.8	15.8	15.1	16.1	28.6	30.6	29.0	44.1	39.7	43.1	2.3	3.0	2.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Rockford	95	4,820	100.0	--	4.7	9.5	--	24.7	21.1	--	30.7	40.0	--	36.7	29.5	--	3.2	0.0	--
Total	95	4,820	100.0	--	4.7	9.5	--	24.7	21.1	--	30.7	40.0	--	36.7	29.5	--	3.2	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Rockford	471	27,820	100.0	6,042	82.5	29.7	42.5	5.9	7.2	11.6	63.1
Total	471	27,820	100.0	6,042	82.5	29.7	42.5	5.9	7.2	11.6	63.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Rockford	95	4,820	100.0	--	85.0	66.3	--	4.9	8.4	10.1	25.3
Total	95	4,820	100.0	--	85.0	66.3	--	4.9	8.4	10.1	25.3
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Rockford	14	970	100.0	170	4.4	0.0	0.0	12.3	0.0	2.4	31.8	28.6	40.4	50.8	71.4	57.2	0.8	0.0	0.0
Total	14	970	100.0	170	4.4	0.0	0.0	12.3	0.0	2.4	31.8	28.6	40.4	50.8	71.4	57.2	0.8	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Rockford	5	540	100.0	--	2.7	0.0	--	17.5	0.0	--	20.2	0.0	--	58.7	100.0	--	0.8	0.0	--
Total	5	540	100.0	--	2.7	0.0	--	17.5	0.0	--	20.2	0.0	--	58.7	100.0	--	0.8	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Rockford	14	970	100.0	170	96.0	21.4	47.6	2.5	35.7	1.5	42.9
Total	14	970	100.0	170	96.0	21.4	47.6	2.5	35.7	1.5	42.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Rockford	5	540	100.0	--	96.9	100.0	--	1.9	0.0	1.1	0.0
Total	5	540	100.0	--	96.9	100.0	--	1.9	0.0	1.1	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Indianapolis	1,465	203,152	90.4	125,788	6.8	4.0	4.9	18.1	11.9	14.7	35.1	30.6	32.5	39.9	53.4	47.8	0.1	0.1	0.1
Limited-Scope:																			
Kokomo	114	9,334	7.0	4,279	6.3	1.8	6.8	14.2	10.5	9.4	48.7	46.5	50.2	30.8	41.2	33.6	0.0	0.0	0.0
Non-MSA Indiana	42	3,429	2.6	3,853	1.4	0.0	0.7	22.9	21.4	21.7	63.6	57.1	65.7	12.0	21.4	11.8	0.0	0.0	0.0
Total	1,621	215,915	100.0	133,920	6.4	3.7	4.9	18.2	12.1	14.7	37.5	32.4	34.0	37.8	51.8	46.3	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Indianapolis	855	124,157	90.3	75,400	5.2	2.1	5.0	17.0	9.9	15.7	40.6	46.1	41.9	36.2	41.3	36.6	0.9	0.6	0.9
Limited-Scope:																			
Kokomo	62	5,733	6.5	2,815	2.3	4.8	2.5	18.2	12.9	17.8	42.6	41.9	43.0	36.9	40.3	36.7	0.0	0.0	0.0
Non-MSA Indiana	30	2,253	3.2	2,711	5.0	0.0	3.0	11.9	3.3	9.0	59.7	70.0	63.2	23.4	26.7	24.8	0.0	0.0	0.0
Total	947	132,142	100.0	80,926	5.1	2.2	4.9	16.8	9.9	15.5	41.8	46.6	42.6	35.5	40.8	36.2	0.8	0.5	0.8
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Indianapolis	1,465	203,152	90.4	125,788	22.3	13.2	8.3	17.3	23.1	18.7	19.3	24.3	20.2	41.1	34.9	34.7	0.0	4.6	18.1
Limited-Scope:																			
Kokomo	114	9,334	7.6	4,279	22.2	7.9	10.7	16.6	28.9	20.9	21.1	28.9	23.4	40.0	33.3	22.9	0.0	0.9	22.1
Non-MSA Indiana	42	3,429	2.6	3,853	22.9	11.9	10.6	19.7	28.6	22.7	19.8	38.1	21.8	37.6	21.4	27.7	0.0	0.0	17.3
Total	1,621	215,915	100.0	133,920	22.3	12.8	8.4	17.4	23.6	18.8	19.4	25.0	20.4	40.8	34.4	34.2	0.0	4.2	18.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Indianapolis	855	124,157	90.3	75,400	21.0	15.8	10.8	17.8	26.0	21.7	20.5	23.2	21.1	40.8	30.6	31.1	0.0	4.4	15.3
Limited-Scope:																			
Kokomo	62	5,733	6.5	2,815	20.1	14.5	12.0	16.8	32.3	22.3	22.5	24.2	24.9	40.6	25.8	26.4	0.0	3.2	14.4
Non-MSA Indiana	30	2,253	3.2	2,711	21.8	23.3	14.9	17.7	30.0	26.7	22.3	23.3	20.8	38.2	20.0	25.5	0.0	3.3	12.1
Total	947	132,142	100.0	80,926	21.0	15.9	10.9	17.7	26.5	21.9	20.7	23.2	21.2	40.6	30.0	30.8	0.0	4.3	15.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Indianapolis	2,862	229,074	94.2	43,716	11.4	8.3	8.5	21.1	14.5	17.3	29.4	33.9	30.7	37.8	43.1	43.0	0.2	0.1	0.5
Limited-Scope:																			
Kokomo	111	5,783	3.7	1,120	10.6	18.9	10.3	18.9	20.7	18.0	45.7	37.8	43.4	24.8	22.5	28.3	0.0	0.0	0.1
Non-MSA Indiana	66	6,239	2.2	1,892	7.8	3.0	5.7	23.9	15.2	18.7	59.3	65.2	62.6	9.0	16.7	12.5	0.0	0.0	0.6
Total	3,039	241,096	100.0	46,728	11.3	8.6	8.4	21.2	14.8	17.4	30.8	34.7	32.3	36.6	41.8	41.4	0.2	0.1	0.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis	562	63,353	96.9	--	8.6	7.1	--	19.9	19.2	--	34.3	41.5	--	34.0	31.0	--	3.2	1.2	--	
Limited-Scope:																				
Kokomo	12	993	2.1	--	7.5	8.3	--	20.1	25.0	--	43.2	33.3	--	29.1	33.3	--	0.0	0.0	--	
Non-MSA Indiana	6	65	1.0	--	10.8	0.0	--	10.7	0.0	--	56.0	50.0	--	22.5	50.0	--	0.0	0.0	--	
Total	580	64,411	100.0	--	8.6	7.1	--	19.6	19.1	--	35.1	41.4	--	33.6	31.2	--	3.0	1.2	--	
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Indianapolis	2,862	229,074	94.2	43,716	89.3	35.8	44.6	3.4	14.8	7.3	49.4
Limited-Scope:											
Kokomo	111	5,783	3.7	1,120	84.5	18.9	39.3	3.3	4.5	12.2	76.6
Non-MSA Indiana	66	6,239	2.2	1,892	83.5	25.8	44.5	4.2	19.7	12.3	54.5
Total	3,039	241,096	100.0	46,728	89.0	34.9	44.5	3.5	14.5	7.6	50.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Indianapolis	562	63,353	96.9	--	91.0	63.3	--	2.8	28.6	6.2	8.0
Limited-Scope:											
Kokomo	12	993	2.1	--	86.3	75.0	--	2.9	8.3	10.8	16.7
Non-MSA Indiana	6	65	1.0	--	85.3	83.3	--	3.7	0.0	11.0	16.7
Total	580	64,411	100.0	--	90.8	63.8	--	2.8	27.9	6.5	8.3
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis	34	1,412	46.6	534	7.0	0.0	0.6	15.3	8.8	6.0	42.5	67.6	68.5	35.1	23.5	24.5	0.1	0.0	0.4	
Limited-Scope:																				
Kokomo	3	91	4.1	113	3.4	0.0	0.9	6.4	33.3	0.0	45.1	66.7	54.1	45.1	0.0	45.0	0.0	0.0	0.0	
Non-MSA Indiana	36	875	49.3	484	0.1	0.0	0.0	6.0	5.6	1.1	64.1	47.2	75.9	29.7	47.2	22.8	0.0	0.0	0.2	
Total	73	2,378	100.0	1,131	6.0	0.0	0.4	13.7	8.2	3.3	45.3	57.5	70.1	34.9	34.2	25.9	0.1	0.0	0.3	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Indianapolis	10	542	83.3	--	6.2	0.0	--	16.7	0.0	--	45.4	80.0	--	30.4	20.0	--	1.2	0.0	--
Limited-Scope:																			
Kokomo	0	0	0.0	--	1.7	0.0	--	8.8	0.0	--	25.4	0.0	--	64.1	0.0	--	0.0	0.0	--
Non-MSA Indiana	2	128	16.7	--	0.6	0.0	--	3.1	0.0	--	58.5	50.0	--	37.9	50.0	--	0.0	0.0	--
Total	12	670	100.0	--	5.4	0.0	--	14.8	0.0	--	46.0	75.0	--	32.9	25.0	--	1.0	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Indianapolis	34	1,412	46.6	534	97.0	29.4	56.1	1.6	23.5	1.4	47.1
Limited-Scope:											
Kokomo	3	91	4.1	113	99.1	0.0	53.2	0.6	0.0	0.3	100.0
Non-MSA Indiana	36	875	49.3	484	98.7	16.7	77.2	1.0	2.8	0.4	80.6
Total	73	2,378	100.0	1,131	97.3	21.9	64.7	1.5	12.3	1.3	65.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Indianapolis	10	542	83.3	--	97.3	40.0	--	1.4	60.0	1.3	0.0
Limited-Scope:											
Kokomo	0	0	0.0	--	99.4	0.0	--	0.3	0.0	0.3	0.0
Non-MSA Indiana	2	128	16.7	--	98.9	50.0	--	0.9	50.0	0.2	0.0
Total	12	670	100.0	--	97.6	41.7	--	1.3	58.3	1.2	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Non-MSA Kansas	12	1,353	100.0	1,080	0.0	0.0	0.0	8.8	16.7	10.1	78.8	41.7	70.7	12.4	41.7	19.2	0.0	0.0	0.0
Total	12	1,353	100.0	1,080	0.0	0.0	0.0	8.8	16.7	10.1	78.8	41.7	70.7	12.4	41.7	19.2	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Non-MSA Kansas	5	634	100.0	765	0.0	0.0	0.0	26.6	60.0	32.9	73.4	40.0	67.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	5	634	100.0	765	0.0	0.0	0.0	26.6	60.0	32.9	73.4	40.0	67.1	0.0	0.0	0.0	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Non-MSA Kansas	12	1,353	100.0	1,080	22.2	8.3	7.9	17.3	0.0	15.7	22.9	41.7	19.4	37.6	50.0	32.9	0.0	0.0	24.1
Total	12	1,353	100.0	1,080	22.2	8.3	7.9	17.3	0.0	15.7	22.9	41.7	19.4	37.6	50.0	32.9	0.0	0.0	24.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Non-MSA Kansas	5	634	100.0	765	26.4	40.0	9.4	20.2	0.0	20.0	17.3	20.0	19.3	36.0	20.0	28.1	0.0	20.0	23.1
Total	5	634	100.0	765	26.4	40.0	9.4	20.2	0.0	20.0	17.3	20.0	19.3	36.0	20.0	28.1	0.0	20.0	23.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
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	
Full-Scope:																				
Non-MSA Kansas	19	1,335	100.0	585	0.0	0.0	0.0	24.2	47.4	23.9	59.9	47.4	60.8	15.9	5.3	14.6	0.0	0.0	0.7	
Total	19	1,335	100.0	585	0.0	0.0	0.0	24.2	47.4	23.9	59.9	47.4	60.8	15.9	5.3	14.6	0.0	0.0	0.7	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Non-MSA Kansas	2	27	100.0	--	0.0	0.0	--	44.0	50.0	--	56.0	50.0	--	0.0	0.0	--	0.0	0.0	--
Total	2	27	100.0	--	0.0	0.0	--	44.0	50.0	--	56.0	50.0	--	0.0	0.0	--	0.0	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Non-MSA Kansas	19	1,335	100.0	585	78.7	36.8	53.0	6.6	5.3	14.7	57.9
Total	19	1,335	100.0	585	78.7	36.8	53.0	6.6	5.3	14.7	57.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Non-MSA Kansas	2	27	100.0	--	79.2	50.0	--	6.2	0.0	14.7	50.0
Total	2	27	100.0	--	79.2	50.0	--	6.2	0.0	14.7	50.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
St Joseph	10	952	100.0	4,115	0.7	0.0	0.5	18.2	0.0	15.2	52.7	30.0	51.5	28.4	70.0	32.7	0.0	0.0	0.0
Total	10	952	100.0	4,115	0.7	0.0	0.5	18.2	0.0	15.2	52.7	30.0	51.5	28.4	70.0	32.7	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
St Joseph	7	466	100.0	2,666	3.0	0.0	4.3	13.8	14.3	13.6	67.5	71.4	66.6	15.7	14.3	15.5	0.0	0.0	0.0
Total	7	466	100.0	2,666	3.0	0.0	4.3	13.8	14.3	13.6	67.5	71.4	66.6	15.7	14.3	15.5	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
St. Joseph	10	952	100.0	4,115	21.0	10.0	6.9	17.6	20.0	20.1	22.8	20.0	20.1	38.5	50.0	31.1	0.0	0.0	21.8
Total	10	952	100.0	4,115	21.0	10.0	6.9	17.6	20.0	20.1	22.8	20.0	20.1	38.5	50.0	31.1	0.0	0.0	21.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
St. Joseph	7	466	100.0	2,666	19.7	14.3	8.9	19.2	57.1	21.9	20.4	0.0	20.2	40.6	28.6	27.4	0.0	0.0	21.7
Total	7	466	100.0	2,666	19.7	14.3	8.9	19.2	57.1	21.9	20.4	0.0	20.2	40.6	28.6	27.4	0.0	0.0	21.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Full-Scope:																			
St. Joseph	25	3,029	100.0	1,489	6.5	4.0	7.3	15.5	0.0	14.8	44.5	60.0	42.4	33.5	36.0	34.5	0.0	0.0	1.0
Total	25	3,029	100.0	1,489	6.5	4.0	7.3	15.5	0.0	14.8	44.5	60.0	42.4	33.5	36.0	34.5	0.0	0.0	1.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
St. Joseph	25	3,029	100.0	1,489	79.0	48.0	53.7	6.0	8.0	15.0	44.0
Total	25	3,029	100.0	1,489	79.0	48.0	53.7	6.0	8.0	15.0	44.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
Full-Scope:																			
Milwaukee	2,623	517,366	37.4	91,475	7.3	3.3	3.7	11.9	7.5	10.1	36.2	33.1	35.6	44.5	56.0	50.5	0.0	0.0	0.0
Appleton	340	51,681	4.9	14,496	0.0	0.0	0.0	9.2	5.3	7.9	81.4	82.4	80.7	9.4	12.4	11.3	0.0	0.0	0.0
Racine	232	31,981	3.3	11,784	2.7	1.7	1.4	16.1	9.5	14.0	57.4	62.1	59.4	23.6	26.7	24.9	0.2	0.0	0.3
Limited-Scope:																			
Duluth	31	3,823	0.4	2,068	5.8	0.0	6.1	10.8	9.7	11.2	65.0	71.0	65.0	18.4	19.4	17.6	0.0	0.0	0.0
Eau Claire	95	12,079	1.4	8,875	0.0	0.0	0.0	11.4	2.1	11.4	77.3	81.1	76.2	11.3	16.8	12.4	0.0	0.0	0.0
Fond du Lac	118	14,462	1.7	5,462	1.2	0.0	1.6	2.5	2.5	2.1	87.1	80.5	85.5	9.2	16.9	10.9	0.0	0.0	0.0
Green Bay	468	59,267	6.7	18,415	0.9	0.4	1.0	19.8	20.7	17.8	54.7	49.6	50.9	24.6	29.3	30.3	0.0	0.0	0.0
Janesville	221	25,770	3.2	8,900	0.8	1.4	1.0	21.4	14.0	17.6	46.2	42.1	46.3	31.7	42.5	35.1	0.0	0.0	0.0
La Crosse	49	6,995	0.7	6,196	0.4	0.0	1.0	7.8	10.2	8.4	68.2	67.3	68.3	23.2	22.4	21.7	0.4	0.0	0.5
Madison	774	174,873	11.0	42,638	0.7	0.8	0.7	11.0	8.7	9.6	60.8	55.4	58.7	27.5	35.1	31.0	0.0	0.0	0.1
Oshkosh	184	26,647	2.6	9,023	0.0	0.0	0.0	9.9	8.2	10.4	62.5	57.1	60.2	27.6	34.8	29.4	0.0	0.0	0.0
Sheboygan	178	21,793	2.5	6,120	0.0	0.0	0.0	7.7	3.4	6.8	76.3	79.2	75.5	15.9	17.4	17.8	0.0	0.0	0.0
Wausau	233	24,915	3.3	8,066	0.7	0.0	0.9	9.3	12.9	9.3	73.2	64.8	71.4	16.9	22.3	18.4	0.0	0.0	0.0
Non-MSA Wisconsin	1,463	212,942	20.9	51,161	0.0	0.0	0.0	8.1	10.7	7.5	76.1	73.8	73.9	15.8	15.4	18.6	0.0	0.0	0.0
Total	7,009	1,184,594	100.0	284,679	2.5	1.5	1.6	11.2	9.3	10.1	59.6	53.5	56.3	26.7	35.7	31.9	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Full-Scope:																			
Milwaukee	1,288	226,402	37.6	48,288	5.4	4.3	5.7	12.0	9.2	12.6	39.8	35.8	38.9	42.6	50.5	42.5	0.2	0.2	0.2
Appleton	170	25,167	5.0	8,451	0.9	1.2	1.8	13.2	10.0	13.7	61.4	57.6	58.3	24.5	31.2	26.2	0.0	0.0	0.0
Racine	123	16,073	3.6	6,812	4.2	2.4	4.1	15.0	8.1	17.1	38.1	37.4	38.3	42.7	52.0	40.5	0.0	0.0	0.0
Limited-Scope:																			
Duluth	19	1,376	0.6	1,218	1.8	0.0	1.5	15.5	15.8	20.6	82.7	84.2	77.9	0.0	0.0	0.0	0.0	0.0	0.0
Eau Claire	56	8,341	1.6	5,101	0.0	0.0	0.0	17.3	17.9	18.6	65.2	60.7	63.8	17.5	21.4	17.6	0.0	0.0	0.0
Fond du Lac	57	5,940	1.7	3,003	0.0	0.0	0.0	12.4	8.8	14.7	67.0	66.7	68.3	20.5	24.6	17.1	0.0	0.0	0.0
Green Bay	254	31,923	7.4	10,701	0.2	0.0	0.3	18.8	18.1	20.8	58.0	55.9	55.3	23.0	26.0	23.7	0.0	0.0	0.0
Janesville	105	10,233	3.1	5,731	0.2	0.0	0.3	19.6	20.0	19.3	54.0	46.7	54.6	26.2	33.3	25.9	0.0	0.0	0.0
La Crosse		3,189	0.9	3,583	0.0	0.0	0.3	13.0	16.1	15.0	66.9	54.8	64.4	19.5	29.0	19.1	0.5	0.0	1.2
Madison	31 342	75,397	10.0	23,270	0.8	0.3	0.6	13.5	9.6	12.3	59.5	54.1	59.5	26.0	36.0	27.3	0.2	0.0	0.3
Oshkosh	91	11,128	2.7	5,561	0.0	0.0	0.0	13.1	8.8	15.7	68.8	71.4	66.6	17.8	19.8	16.7	0.3	0.0	1.0
Sheboygan	78	9,469	2.3	3,428	0.0	0.0	0.0	3.9	3.8	6.5	73.9	74.4	71.7	22.1	21.8	21.8	0.0	0.0	0.0
Wausau	97	11,545	2.8	4,792	0.0	0.0	0.0	17.2	14.4	17.3	75.0	77.3	75.3	7.8	8.2	7.4	0.0	0.0	0.0
Non-MSA Wisconsin	711	111,594	20.8	30,940	0.0	0.0	0.1	7.6	9.3	8.6	74.9	72.0	72.2	17.5	18.7	19.2	0.0	0.0	0.0
Total	3,422	547,774	100.0	160,879	1.8	1.8	2.1	12.3	10.5	13.3	58.6	52.5	55.9	27.2	35.2	28.6	0.1	0.1	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee	2,623	517,366	37.4	91,475	23.5	11.2	6.4	16.2	20.4	17.9	19.4	20.0	22.6	40.9	42.4	39.6	0.0	6.0	13.5
Appleton	340	51,681	4.9	14,496	18.2	14.1	9.5	18.6	20.3	22.3	24.9	23.2	24.4	38.3	37.6	31.7	0.0	4.7	12.2
Racine	232	31,981	3.3	11,784	20.0	15.1	6.6	17.8	23.3	19.1	21.9	25.0	23.6	40.3	29.3	36.9	0.0	7.3	13.7
Limited-Scope:																			
Duluth	31	3,823	0.4	2,068	22.5	12.9	8.3	18.8	29.0	19.4	22.6	19.4	21.8	36.1	35.5	30.7	0.0	3.2	19.8
Eau Claire	95	12,079	1.4	8,875	18.6	12.6	8.9	18.5	27.4	22.0	24.2	27.4	25.0	38.7	29.5	31.8	0.0	3.2	12.3
Fond du Lac	118	14,462	1.7	5,462	17.0	11.0	6.5	18.4	23.7	21.2	25.2	26.3	24.5	39.4	31.4	36.5	0.0	7.6	11.4
Green Bay	468	59,267	6.7	18,415	19.8	16.0	8.9	18.4	29.7	21.0	22.0	23.1	22.9	39.8	27.6	34.7	0.0	3.6	12.4
Janesville	221	25,770	3.2	8,900	20.7	14.9	7.3	18.2	24.0	21.5	21.6	24.9	24.3	39.6	33.0	33.4	0.0	3.2	13.6
La Crosse	49	6,995	0.7	6,196	18.3	22.4	9.4	18.9	24.5	20.4	22.1	20.4	23.8	40.6	30.6	32.5	0.0	2.0	14.0
Madison	774	174,873	11.0	42,638	19.5	12.8	7.7	17.4	22.4	20.7	23.3	20.2	25.1	39.8	41.7	37.6	0.0	3.0	8.9
Oshkosh	184	26,647	2.6	9,023	18.6	9.8	8.1	18.4	32.6	20.9	24.0	21.7	22.4	39.0	33.7	33.8	0.0	2.2	14.6
Sheboygan	178	21,793	2.5	6,120	17.7	11.8	8.1	18.4	19.1	22.1	25.6	27.0	22.8	38.3	39.3	33.5	0.0	2.8	13.5
Wausau	233	24,915	3.3	8,066	18.1	15.0	8.9	18.8	24.9	20.9	23.3	24.0	23.6	39.8	32.6	32.0	0.0	3.4	14.5
Non-MSA Wisconsin	1,463	212,942	20.9	51,161	17.5	9.4	5.6	19.3	23.1	17.6	23.1	24.5	22.4	40.1	39.0	41.4	0.0	4.0	13.1
Total	7,009	1,184,594	100.0	284,679	20.1	11.9	7.1	17.8	22.7	19.4	22.1	22.2	23.3	40.0	38.6	37.6	0.0	4.7	12.5

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee	1,288	226,402	37.6	48,288	22.4	16.9	9.3	16.8	24.2	20.3	20.5	19.8	22.7	40.3	34.1	36.1	0.0	5.0	11.6
Appleton	170	25,167	5.0	8,451	17.6	16.5	11.2	19.3	28.8	25.5	24.8	20.6	25.6	38.3	30.6	27.5	0.0	3.5	10.2
Racine	123	16,073	3.6	6,812	21.0	16.3	8.9	18.3	22.8	24.2	20.1	26.0	22.8	40.5	34.1	32.1	0.0	0.8	12.0
Limited-Scope:																			
Duluth	19	1,376	0.6	1,218	20.9	31.6	11.7	18.5	36.8	23.2	24.2	21.1	22.2	36.4	5.3	26.4	0.0	5.3	16.6
Eau Claire	56	8,341	1.6	5,101	18.9	23.2	10.8	18.9	21.4	23.2	23.9	16.1	25.1	38.4	33.9	29.4	0.0	5.4	11.5
Fond du Lac	57	5,940	1.7	3,003	17.1	26.3	16.9	20.2	33.3	26.5	25.2	22.8	23.8	37.4	17.5	21.6	0.0	0.0	11.2
Green Bay	254	31,923	7.4	10,701	19.1	19.7	11.9	19.0	29.5	22.9	23.4	20.5	23.6	38.5	26.0	31.1	0.0	4.3	10.4
Janesville	105	10,233	3.1	5,731	19.6	18.1	8.9	18.8	32.4	21.8	22.5	21.9	24.8	39.1	21.0	32.7	0.0	6.7	11.7
La Crosse	31	3,189	0.9	3,583	16.6	19.4	11.1	19.1	32.3	20.9	24.4	12.9	23.8	40.0	32.3	33.0	0.0	3.2	11.3
Madison	342	75,397	10.0	23,270	17.7	20.2	9.2	18.7	24.6	21.0	23.8	19.6	25.9	39.8	30.7	36.0	0.0	5.0	7.8
Oshkosh	91	11,128	2.7	5,561	18.8	19.8	9.4	19.2	34.1	23.3	23.0	17.6	22.6	39.1	27.5	31.4	0.0	1.1	13.4
Sheboygan	78	9,469	2.3	3,428	15.6	11.5	10.6	20.6	19.2	22.8	24.7	26.9	23.5	39.1	37.2	31.6	0.0	5.1	11.4
Wausau	97	11,545	2.8	4,792	17.8	14.4	12.0	19.1	26.8	24.3	25.1	26.8	24.6	38.0	30.9	27.7	0.0	1.0	11.5
Non-MSA Wisconsin	711	111,594	20.8	30,940	17.5	16.6	9.0	18.7	30.2	22.1	23.2	21.4	23.0	40.6	28.4	35.4	0.0	3.4	10.4
Total	3,422	547,774	100.0	160,879	19.4	17.6	9.8	18.3	26.8	21.9	22.6	20.7	23.7	39.7	30.7	33.8	0.0	4.1	10.8
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
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	
Full-Scope:																				
Milwaukee	5,153	492,839	50.8	36,358	11.6	10.4	10.5	12.1	10.3	10.9	34.6	32.1	33.2	41.6	47.2	44.9	0.0	0.0	0.5	
Appleton	375	43,691	3.7	4,191	0.0	0.0	0.0	10.2	9.3	9.5	82.0	83.2	80.1	7.8	7.5	9.8	0.0	0.0	0.6	
Racine	349	24,747	3.4	3,593	5.3	7.5	5.4	18.9	14.3	17.9	53.6	59.3	52.1	19.3	15.8	21.4	2.9	3.2	3.3	
Limited-Scope:																				
Duluth	30	3,386	0.3	538	28.8	30.0	28.7	8.9	13.3	6.6	50.0	46.7	51.0	12.3	10.0	13.2	0.0	0.0	0.4	
Eau Claire	123	14,127	1.2	2,426	0.0	0.0	0.0	18.4	27.6	15.1	70.7	61.0	70.1	10.9	11.4	14.2	0.0	0.0	0.6	
Fond du Lac	96	6,068	0.9	1,806	9.0	1.0	6.7	5.2	1.0	3.0	78.2	97.9	80.7	7.6	0.0	9.0	0.0	0.0	0.7	
Green Bay	542	46,484	5.3	6,504	2.7	4.8	2.5	25.1	35.6	24.7	49.4	36.3	45.9	22.8	23.2	26.3	0.0	0.0	0.7	
Janesville	322	27,812	3.2	2,064	1.3	4.0	1.4	27.3	22.7	22.7	37.1	36.3	38.0	34.4	37.0	37.7	0.0	0.0	0.3	
La Crosse	152	15,245	1.5	1,387	12.0	2.0	9.6	16.7	13.2	12.6	56.5	77.0	55.3	13.8	7.9	20.4	1.1	0.0	2.1	
Madison	1,081	73,274	10.7	11,684	2.2	2.0	1.6	15.1	19.5	13.6	51.4	46.0	52.5	29.3	30.0	30.5	2.0	2.5	1.8	
Oshkosh	167	11,960	1.6	2,632	0.0	0.0	0.0	18.2	16.8	17.0	56.1	49.1	53.9	25.7	34.1	28.9	0.0	0.0	0.3	
Sheboygan	142	8,611	1.4	1,944	0.0	0.0	0.0	16.2	17.6	15.6	68.4	72.5	66.6	15.4	9.9	16.9	0.0	0.0	0.9	
Wausau	211	23,838	2.1	2,811	5.4	4.3	4.2	10.4	11.4	8.4	68.8	66.4	72.9	15.4	18.0	13.8	0.0	0.0	0.7	
Non-MSA Wisconsin	1,393	104,150	13.7	15,993	0.0	0.0	0.0	9.8	11.6	9.8	75.7	76.0	73.3	14.3	12.4	15.8	0.1	0.0	1.2	
Total	10,136	896,232	100.0	93,931	5.2	6.3	5.2	13.8	13.7	12.6	54.2	46.1	51.2	26.3	33.5	30.1	0.5	0.4	0.9	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee	824	80,802	50.2	--	10.6	12.1	--	15.4	19.4	--	34.7	32.5	--	38.6	34.6	--	0.7	1.3	--
Appleton	61	6,467	3.7	--	4.5	6.6	--	11.2	8.2	--	63.5	72.1	--	20.9	13.1	--	0.0	0.0	--
Racine	66	5,541	4.0	--	10.8	13.6	--	15.8	12.1	--	36.2	47.0	--	37.0	27.3	--	0.1	0.0	--
Limited-Scope:																			
Duluth	6	1,191	0.4	--	16.9	33.3	--	22.0	33.3	--	61.1	33.3	--	0.0	0.0	--	0.0	0.0	--
Eau Claire	15	313	0.9	--	0.0	0.0	--	23.0	13.3	--	59.9	40.0	--	17.1	46.7	--	0.0	0.0	--
Fond du Lac	12	797	0.7	--	0.0	0.0	--	19.9	0.0	--	63.7	66.7	--	16.4	33.3	--	0.0	0.0	--
Green Bay	132	11,737	8.0	--	1.4	0.0	--	23.4	55.3	--	52.1	29.5	--	23.1	15.2	--	0.0	0.0	--
Janesville	41	3,146	2.5	--	3.0	4.9	--	16.5	17.1	--	50.1	48.8	--	30.3	29.3	--	0.0	0.0	--
La Crosse	36	3,033	2.2	--	1.9	0.0	--	18.3	16.7	--	51.7	83.3	--	15.9	0.0	--	12.2	0.0	--
Madison	143	10,502	8.7	--	4.5	8.4	--	14.8	14.7	--	52.7	50.4	--	24.9	25.2	--	3.1	1.4	--
Oshkosh	22	3,908	1.3	--	0.0	0.0	--	16.7	18.2	--	63.4	63.6	--	15.0	18.2	--	4.9	0.0	--
Sheboygan	22	1,223	1.3	--	0.0	0.0	--	6.6	13.6	--	73.1	59.1	--	20.3	27.3	--	0.0	0.0	--
Wausau	48	12,624	2.9	--	0.0	0.0	--	21.9	27.1	--	69.1	66.7	--	9.0	6.3	--	0.0	0.0	--
Non-MSA Wisconsin	215	16,286	13.1	--	0.2	0.0	--	8.5	12.6	--	74.0	66.5	--	17.2	20.9	--	0.0	0.0	--
Total	1,643	157,570	100.0	--	5.1	7.9	--	14.8	20.1	--	52.5	43.9	--	26.5	27.3	--	1.1	0.8	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Milwaukee	5,153	492,839	50.8	36,358	80.7	24.3	50.1	7.9	11.1	11.4	64.7
Appleton	375	43,691	3.7	4,191	76.9	22.7	52.5	7.6	10.7	15.6	66.7
Racine	349	24,747	3.4	3,593	82.6	30.1	47.0	6.3	14.3	11.1	55.6
Limited-Scope:											
Duluth	30	3,386	0.3	538	76.5	16.7	47.1	7.1	23.3	16.4	60.0
Eau Claire	123	14,127	1.2	2,426	80.1	21.1	47.0	6.0	9.8	13.9	69.1
Fond du Lac	96	6,068	0.9	1,806	78.9	29.2	59.7	6.8	12.5	14.4	58.3
Green Bay	542	46,484	5.3	6,504	78.8	25.8	53.7	7.6	20.5	13.5	53.7
Janesville	322	27,812	3.2	2,064	80.4	25.8	46.5	6.1	10.9	13.5	63.4
La Crosse	152	15,245	1.5	1,387	76.5	15.1	45.3	7.7	50.0	15.8	34.9
Madison	1,081	73,274	10.7	11,684	81.9	29.1	50.0	6.1	6.0	12.1	64.8
Oshkosh	167	11,960	1.6	2,632	78.0	28.1	52.3	7.1	7.2	14.9	64.7
Sheboygan	142	8,611	1.4	1,944	78.6	26.8	55.8	7.6	4.2	13.8	69.0
Wausau	211	23,838	2.1	2,811	78.1	19.9	56.1	7.3	16.6	14.6	63.5
Non-MSA Wisconsin	1,393	104,150	13.7	15,993	79.6	27.9	54.9	6.2	7.5	14.2	64.7
Total	10,136	896,232	100.0	93,931	80.0	25.4	51.4	7.0	11.2	13.0	63.4

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Milwaukee	824	80,802	50.2	--	85.8	60.3	--	5.6	25.2	8.6	14.4
Appleton	61	6,467	3.7	--	82.3	47.5	--	5.6	39.3	12.1	13.1
Racine	66	5,541	4.0	--	86.5	53.0	--	4.7	33.3	8.8	13.6
Limited-Scope:											
Duluth	6	1,191	0.4	--	80.2	83.3	--	5.9	16.7	13.9	0.0
Eau Claire	15	313	0.9	--	83.9	66.7	--	4.7	0.0	11.4	33.3
Fond du Lac	12	797	0.7	--	82.8	66.7	--	5.3	25.0	11.9	8.3
Green Bay	132	11,737	8.0	--	83.5	40.9	--	5.8	43.9	10.7	15.2
Janesville	41	3,146	2.5	--	84.3	63.4	--	4.8	19.5	10.8	17.1
La Crosse	36	3,033	2.2	--	81.4	30.6	--	5.8	66.7	12.8	2.8
Madison	143	10,502	8.7	--	85.8	65.0	--	4.6	18.2	9.6	16.8
Oshkosh	22	3,908	1.3	--	82.4	63.6	--	5.5	13.6	12.0	22.7
Sheboygan	22	1,223	1.3	--	82.6	77.3	--	6.2	13.6	11.2	9.1
Wausau	48	12,624	2.9	--	82.9	16.7	--	5.5	79.2	11.7	4.2
Non-MSA Wisconsin	215	16,286	13.1	--	83.9	70.7	--	4.7	15.8	11.4	13.5
Total	1,643	157,570	100.0	--	84.6	58.4	--	5.2	27.5	10.2	14.1
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020-21

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee	53	4,091	6.3	220	6.3	3.8	4.0	7.4	3.8	4.0	37.1	47.2	38.4	49.2	45.3	53.0	0.0	0.0	0.5
Appleton	117	5,624	13.8	292	0.0	0.0	0.0	8.3	5.1	4.8	85.1	90.6	92.3	6.6	4.3	2.9	0.0	0.0	0.0
Racine	3	197	0.4	90	1.9	0.0	0.0	7.0	0.0	1.1	54.4	33.3	26.7	36.7	66.7	72.2	0.0	0.0	0.0
Limited-Scope:																			
Duluth	0	0	0.0	8	7.0	0.0	0.0	5.3	0.0	0.0	84.2	0.0	87.5	3.5	0.0	12.5	0.0	0.0	0.0
Eau Claire	33	3,384	3.9	129	0.0	0.0	0.0	13.0	3.0	15.9	78.1	90.9	71.7	8.9	6.1	12.4	0.0	0.0	0.0
Fond du Lac	26	1,190	3.1	179	0.7	0.0	0.0	0.9	0.0	0.0	87.7	96.2	86.0	10.7	3.8	13.4	0.0	0.0	0.6
Green Bay	61	4,352	7.2	309	0.5	0.0	0.0	15.1	3.3	12.0	57.4	67.2	63.3	27.0	29.5	24.4	0.0	0.0	0.4
Janesville	27	1,585	3.2	284	0.6	0.0	0.0	6.7	0.0	0.0	43.2	25.9	39.1	49.5	74.1	60.9	0.0	0.0	0.0
La Crosse	4	568	0.5	30	1.2	25.0	0.0	4.2	0.0	7.1	74.6	75.0	82.1	19.2	0.0	10.7	0.8	0.0	0.0
Madison	106	7,277	12.5	513	0.5	0.0	0.9	10.3	0.9	11.0	62.5	62.3	65.8	26.5	36.8	22.4	0.3	0.0	0.0
Oshkosh	9	391	1.1	60	0.0	0.0	0.0	6.4	0.0	0.0	66.7	100.0	72.7	26.9	0.0	27.3	0.0	0.0	0.0
Sheboygan	8	303	0.9	124	0.0	0.0	0.0	3.3	0.0	1.7	73.1	75.0	75.0	23.7	25.0	23.3	0.0	0.0	0.0
Wausau	35	1,958	4.1	316	0.2	2.9	0.0	3.3	8.6	0.0	83.9	62.9	90.9	12.6	25.7	9.1	0.0	0.0	0.0
Non-MSA Wisconsin	366	30,070	43.2	1,985	0.0	0.0	0.0	3.3	2.5	2.1	82.1	84.4	84.6	14.6	13.1	13.0	0.0	0.0	0.3
Total	848	60,990	100.0	4,539	1.1	0.5	0.1	6.5	2.8	4.0	69.2	76.7	74.6	23.2	20.0	20.9	0.1	0.0	0.2

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee	6	840	7.9	--	6.9	0.0	--	9.0	0.0	--	37.6	100.0	--	46.2	0.0	--	0.3	0.0	--
Appleton	1	25	1.3	--	0.9	0.0	--	8.3	0.0	--	67.4	100.0	--	23.5	0.0	--	0.0	0.0	--
Racine	3	28	3.9	--	3.2	0.0	--	6.3	0.0	--	31.0	33.3	--	59.6	66.7	--	0.0	0.0	--
Limited-Scope:																			
Duluth	0	0	0.0	--	5.6	0.0	--	9.7	0.0	--	84.7	0.0	--	0.0	0.0	--	0.0	0.0	--
Eau Claire	2	261	2.6	--	0.0	0.0	--	13.6	0.0	--	64.9	100.0	--	21.5	0.0	--	0.0	0.0	--
Fond du Lac	6	472	7.9	--	0.0	0.0	--	3.9	0.0	--	74.4	100.0	--	21.7	0.0	--	0.0	0.0	--
Green Bay	7	1,455	9.2	--	0.1	0.0	--	15.3	28.6	--	65.3	71.4	--	19.3	0.0	--	0.0	0.0	--
Janesville	2	198	2.6	--	0.5	0.0	--	8.1	0.0	--	55.9	100.0	--	35.6	0.0	--	0.0	0.0	--
La Crosse	0	0	0.0	--	0.7	0.0	--	7.8	0.0	--	70.9	0.0	--	18.3	0.0	--	2.3	0.0	--
Madison	16	2,241	21.1	--	1.1	0.0	--	11.6	0.0	--	68.9	68.8	--	18.1	31.3	--	0.3	0.0	--
Oshkosh	2	169	2.6	--	0.0	0.0	--	8.0	0.0	--	63.8	100.0	--	27.1	0.0	--	1.1	0.0	--
Sheboygan	0	0	0.0	--	0.0	0.0	--	1.7	0.0	--	75.9	0.0	--	22.3	0.0	--	0.0	0.0	--
Wausau	6	255	7.9	--	0.0	0.0	--	15.7	0.0	--	75.5	66.7	--	8.8	33.3	--	0.0	0.0	--
Non-MSA Wisconsin	25	3,185	32.9	--	0.0	0.0	--	3.6	4.8	--	82.9	81.0	--	13.5	14.3	--	0.0	0.0	--
Total	76	9,129	100.0	--	1.4	0.0	--	7.8	4.2	--	67.7	79.2	--	22.9	16.7	--	0.2	0.0	--
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Milwaukee	53	4,091	6.3	220	93.8	34.0	55.1	4.4	26.4	1.9	39.6
Appleton	117	5,624	13.8	292	95.2	40.2	47.3	3.2	12.0	1.7	47.9
Racine	3	197	0.4	90	94.9	0.0	67.8	3.5	0.0	1.6	100.0
Limited-Scope:											
Duluth	0	0	0.0	8	94.7	0.0	75.0	3.5	0.0	1.8	0.0
Eau Claire	33	3,384	3.9	129	96.7	12.1	31.9	2.6	21.2	0.7	66.7
Fond du Lac	26	1,190	3.1	179	94.4	26.9	65.9	4.9	23.1	0.7	50.0
Green Bay	61	4,352	7.2	309	93.9	31.1	44.0	4.9	6.6	1.2	62.3
Janesville	27	1,585	3.2	284	96.5	37.0	59.4	2.2	11.1	1.4	51.9
La Crosse	4	568	0.5	30	94.6	0.0	42.9	2.3	50.0	3.1	50.0
Madison	106	7,277	12.5	513	96.1	25.5	47.6	2.2	20.8	1.7	53.8
Oshkosh	9	391	1.1	60	97.3	44.4	52.7	2.4	0.0	0.3	55.6
Sheboygan	8	303	0.9	124	92.8	25.0	55.8	6.3	0.0	0.9	75.0
Wausau	35	1,958	4.1	316	96.4	28.6	65.1	3.0	8.6	0.6	62.9
Non-MSA Wisconsin	366	30,070	43.2	1,985	95.9	25.7	49.4	2.9	21.0	1.2	53.3
Total	848	60,990	100.0	4,539	95.4	28.5	51.6	3.2	17.9	1.4	53.5
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent. BMO Harris Bank N.A. (90000075633), BMO Harris Bank National Assoc (9RTYW11W2K3), BMO HARRIS BANK N.A. (10000014583) excluded from Aggregate.</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Milwaukee	6	840	7.9	--	95.3	50.0	--	3.3	50.0	1.4	0.0
Appleton	1	25	1.3	--	96.1	100.0	--	2.7	0.0	1.2	0.0
Racine	3	28	3.9	--	96.3	100.0	--	2.8	0.0	1.0	0.0
Limited-Scope:											
Duluth	0	0	0.0	--	95.8	0.0	--	2.8	0.0	1.4	0.0
Eau Claire	2	261	2.6	--	97.8	100.0	--	1.8	0.0	0.4	0.0
Fond du Lac	6	472	7.9	--	95.3	50.0	--	4.1	50.0	0.6	0.0
Green Bay	7	1,455	9.2	--	95.4	42.9	--	3.5	57.1	1.1	0.0
Janesville	2	198	2.6	--	97.1	100.0	--	1.7	0.0	1.2	0.0
La Crosse	0	0	0.0	--	95.4	0.0	--	2.0	0.0	2.6	0.0
Madison	16	2,241	21.1	--	96.6	50.0	--	1.9	43.8	1.5	6.3
Oshkosh	2	169	2.6	--	98.3	100.0	--	1.5	0.0	0.2	0.0
Sheboygan	0	0	0.0	--	95.0	0.0	--	4.5	0.0	0.5	0.0
Wausau	6	255	7.9	--	97.0	83.3	--	2.5	16.7	0.5	0.0
Non-MSA Wisconsin	21	2,525	32.9	--	96.6	61.9	--	2.4	33.3	1.0	4.8
Total	72	8,469	100.0	--	96.3	62.5	--	2.6	34.7	1.1	2.8
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.											