



PUBLIC DISCLOSURE

July 14, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Western National Bank
Charter Number 10971

523 Thayer Avenue
Chester, NE 68327

Office of the Comptroller of the Currency

7101 College Blvd., Suite 1600
Overland Park, KS 66210

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.

Contents

Overall CRA Rating..... 1

Description of Institution 1

Scope of the Evaluation 2

Discriminatory or Other Illegal Credit Practices Review 3

State Rating..... 4

 State of Nebraska.....4

 State of Kansas9

Appendix A: Scope of Examination A-1

Appendix B: Summary of State Ratings..... B-1

Appendix C: Definitions and Common Abbreviations..... C-1

Appendix D: Tables of Performance Data..... D-1

Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The overall borrower distribution of loans is reasonable.
- The loan-to-deposit (LTD) ratio is more than reasonable.
- The majority of lending by both number and dollar were originated inside the assessment areas (AA).
- The Lending Test rating in both states is satisfactory.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AAs, the bank’s LTD ratio was more than reasonable. Western National Bank’s (WNB) quarterly average LTD ratio is 95.36 percent from June 30, 2021, through December 31, 2024. WNB’s LTD ratio ranged from a low of 81.69 percent to a high of 104.12 percent. The average quarterly LTD ratio for three other similarly situated institutions headquartered in Thayer County, Nebraska, over the same period is 86.70 percent. The asset size of these institutions ranged from \$26.8 million to \$515.94 million, with an average asset size of \$207.28 million.

Lending in Assessment Area

A majority of the WNB’s loans were inside its AAs. The bank originated and purchased 67.6 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Areas										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	83	77.57	24	22.43	107	6,299	64.89	3,408	35.11	9,707
Small Farm	69	53.49	60	46.51	129	9,551	56.31	7,409	43.69	16,960
Consumer	48	80.00	12	20.00	60	637	84.71	115	15.29	752
Total	200	67.57	96	32.43	296	16,487	60.13	10,932	39.87	27,419
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%										

Description of Institution

WNB is a \$249.8 million multi-state community bank headquartered in Chester, Nebraska with tier 1 capital and core deposits totaling \$21.3 million and \$193.4 million, respectively as of December 31, 2024. WNB is a wholly owned subsidiary of Summerfield Financial Services, LLC, a one-bank holding company headquartered in Lincoln, Nebraska. WNB has 11 full-service branch locations with automated teller machines (ATMs) located in seven branch locations and three near branch locations in the local area.

In July 2021, WNB completed a merger with Mainstreet Bank and expanded operations with seven new branch locations in Wymore, Virginia, Tecumseh, Syracuse, Louisville, Cook, and Peru, Nebraska. In October 2022, the Virginia branch location closed. In April 2023, management converted an administrative office, acquired during the Mainstreet Bank merger, into a branch location in Lincoln, Nebraska. The OCC is evaluating the Lincoln branch for CRA performance due to management actively growing loans and marketing this area since July 2021. WNB operated branches in Chester, Byron, and Cairo, Nebraska, and Summerfield, Kansas since the prior performance evaluation.

WNB offers a full range of deposit and loan products and services. As of December 31, 2024, the bank's net loans of \$199.9 million represent 80 percent of total assets. Farmland and agricultural operating loans remain WNB's primary loan product, totaling \$96 million, or 38.5 percent of net loans. The remainder of the loan portfolio consists of 1-4 family residential real estate (17.2 percent), non-farm non-residential (8.2 percent), multifamily (5.6 percent), percent commercial (6.9), construction (2.8 percent), and other consumer loans (1.8 percent). Management's strategy is focused on agricultural lending, 1-4 family residential real estate, and multi-family real estate. There are currently no plans for any acquisitions or mergers.

WNB delineated six AAs. For purposes of this evaluation, however, examiners combined Gage and Lancaster Counties into one statistical area (CSA), the Lincoln-Beatrice CSA resulting in five AAs. In Kansas, the AA includes the non-MSA of Marshall County. In Nebraska, the AAs include the Nebraska non-MSA encompassing Johnson, Otoe, Nemaha, and Thayer Counties, Grand Island MSA encompassing Hall County, the Lincoln-Beatrice CSA encompassing Gage and Lancaster Counties, and the Omaha MSA encompassing Cass County. There are no legal, financial, or other factors impeding WNB's ability to meet the credit needs of its AAs. WNB received a "Satisfactory" rating under the Small Bank Performance Standards at the previous CRA evaluation, dated April 19, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assessed WNB using the Small Bank CRA examination procedures. Our review included the Lending Test which evaluated WNB's record of meeting the credit needs of its community through its lending activities. Agriculture lending is the primary product in the Nebraska non-MSA, Kansas non-MSA, and the Grand Island MSA, by dollar and number. Commercial small business lending is the primary product in the Omaha MSA by dollar and the Lincoln-Beatrice CSA, by dollar and number. Consumer lending is the primary product in the Omaha MSA by number. The evaluation period for the Lending Test is January 1, 2022, through December 31, 2024. We sampled 296 total loans including, 60 consumer, 107 small business, and 129 small farm loans originated or purchased in WNB's AAs during this period to assess the bank's performance.

Selection of Areas for Full-Scope Review

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

Ratings

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

The state of Nebraska receives the most weight in arriving at the overall conclusion. The state of Nebraska had four AAs with 10 branch locations in the state carrying 91.9 percent of total deposits and 93.5 percent of loans by number and 97.2 percent of loans by dollar. The state of Kansas had one AA with one branch location carrying only 8.9 percent of total deposits and 2.8 percent of loans by number and 6.5 percent of loans by dollar.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Nebraska

CRA rating for the State of Nebraska¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- Excellent borrower income distribution of loans to small farms.
- Excellent borrower income distribution of loans to small businesses.
- Reasonable geographic distribution in the Nebraska non-MSA AA.

Description of Institution's Operations in Nebraska

WNB delineated five AAs within the state of Nebraska. However, for purposes of this exam we combined Lancaster and Gage Counties into one CSA, the Lincoln-Beatrice CSA. The AAs also include the Nebraska non-MSA (Johnson, Otoe, Nemaha, and Thayer counties). These two AAs are receiving full-scope reviews. The Grand Island MSA (Hall County) and Omaha MSA (Cass County) received limited scope reviews.

Nebraska non-MSA

The Nebraska non-MSA includes Johnson, Nemaha, Thayer, and Otoe counties. WNB is headquartered in Chester with additional branches in Byron, Cook, Peru, Syracuse, and Tecumseh. There is an ATM located in each branch except Cook. The AA consists of one moderate-, seven middle-, and three upper-income census tracts (CTs). WNB designates the entire counties as the AA. The Federal Financial Institutions Examination Council (FFIEC) lists five CTs as distressed due to population loss and/or being in a remote rural area, one in Johnson County, and two in Nemaha and Thayer County. The two Thayer County CTs are additionally designated underserved.

The 2024 demographic data table below presents a population of 33,310 and a median family income of \$85,800. The AA has 10.44 percent of households below the poverty level and 7.88 percent of families below the poverty level.

According to the 2023 US Census employment reports, manufacturing, retail trade, and health care and social assistance, comprise the primary types of employment in the AA. Demographic data prepared in the table below shows an unemployment rate for the AA at 3.11 percent. The US Bureau of Labor Statistics presents the Nebraska unemployment rate at 2.9 percent, and the national unemployment rate of 4.1 percent both as of December 2024.

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

The 2024 FDIC Deposit Market Share Report shows 21 other financial institutions with 28 branches in the AA. Competition is strong based on the population size. WNB ranks fourth with 8.72 percent of the deposit market share (\$134 million). The top competitor has 14.45 percent of the deposit market share (\$222 million). Competitors include larger regional banks with greater assets and branch networking.

Examiners utilized one community contact for the AA. The contact was a group of local governments. The contact identified affordable housing construction loans including multifamily and single family as a community need and a potential opportunity for local financial institutions. The contact was not aware of any discriminatory practices taking place.

The following table provides a summary of demographics, including housing and business information for the Nebraska non-MSA AA.

Assessment Area(s) – NE non-MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.00	9.09	63.64	27.27	0.00
Population by Geography	33,310	0.00	10.05	64.80	25.15	0.00
Housing Units by Geography	15,638	0.00	8.02	67.82	24.17	0.00
Owner-Occupied Housing by Geography	9,837	0.00	5.96	65.63	28.41	0.00
Occupied Rental Units by Geography	3,678	0.00	12.37	70.96	16.67	0.00
Vacant Units by Geography	2,123	0.00	10.03	72.49	17.48	0.00
Businesses by Geography	1,399	0.00	7.29	65.9	26.8	0.00
Farms by Geography	345	0.00	5.80	58.55	35.65	0.00
Family Distribution by Income Level	8,957	19.28	18.03	20.88	41.81	0.00
Household Distribution by Income Level	13,515	21.69	16.86	18.31	43.14	0.00
Unemployment rate (%)	3.11	0.00	2.77	3.55	2.09	0.00
Households Below Poverty Level (%)	10.44	0.00	12.30	11.69	6.54	0.00
Median Family Income (non-MSAs - NE)		\$70,804	Median Housing Value			\$106,400
Median Family Income (non-MSAs - NE) for 2024		\$85,800	Median Gross Rent			\$644
			Families Below Poverty Level			7.88
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Lincoln-Beatrice NE CSA

The Lincoln-Beatrice CSA consists of one (Lancaster County) of two counties in the Lincoln, NE MSA and Gage County in the Beatrice, NE Micropolitan Statistical Area. This AA includes two branches, one in Lincoln and the other in Wymore. Neither branch has an ATM, however there is an ATM located at a gas station in Wymore. The AA consists of 88 CTs with six low-, 18 moderate-, 30 middle-, and 29 upper-income. There are five tracts where income information is unavailable. US Census demographic information, presented in the table below, presents a population of 344,312 and a median family income of \$102,200 in 2024. The CSA has 11.95 percent of households below the poverty level and 6.83 percent of families below the poverty level.

The unemployment rate for the AA is 3.27 percent. The US Bureau of Labor Statistics presents the Nebraska unemployment rate at 2.9 percent, and the national unemployment rate at 4.1 percent both as of December 2024. The 2023 US Census employment reports show, finance and insurance, health care and social assistance, and retail trade comprise the primary types of employment in the AA.

The 2024 FDIC Deposit Market Share Report shows strong market competition in the AA. There are 30 other financial institutions with 132 branches competing in the AA. WNB ranked 23rd with 0.23 percent deposit market share and \$34.5 million in deposits within the AA. There is competition from larger

banks, such as Wells Fargo, U.S. Bank, and First National Bank of Omaha as well as multiple regional and local institutions.

During the examination, examiners utilized one community contact within the AA. The contact was a low-income housing group. The contact identified affordable housing as a community need and a potential opportunity for local financial institutions. The contact states there is a healthy amount of participation of financial institutions in the community.

The following table provides a summary of demographics, including housing and business information for the Lincoln-Beatrice CSA.

Assessment Area(s) – Lincoln-Beatrice CSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	88	6.82	20.45	34.09	32.95	5.68
Population by Geography	344,312	5.80	20.39	37.10	33.61	3.11
Housing Units by Geography	143,546	7.82	22.71	37.89	30.69	0.88
Owner-Occupied Housing by Geography	81,086	2.10	15.76	41.90	40.10	0.13
Occupied Rental Units by Geography	54,628	15.57	33.02	31.02	18.60	1.79
Vacant Units by Geography	7,832	13.01	22.65	44.37	17.61	2.36
Businesses by Geography	13,387	5.64	17.83	34.88	39.05	2.60
Farms by Geography	788	3.68	7.49	33.63	54.31	0.89
Family Distribution by Income Level	81,476	19.27	18.75	22.03	39.95	0.00
Household Distribution by Income Level	135,714	23.04	17.21	19.38	40.37	0.00
Unemployment rate (%)	3.27	4.92	4.98	2.56	1.82	13.79
Households Below Poverty Level (%)	11.95	29.69	16.64	9.86	6.01	43.44
Median Family Income (30700 - Lincoln, NE MSA)		\$82,381	Median Housing Value			\$167,050
Median Family Income (30700 - Lincoln, NE MSA) for 2024		\$102,200	Median Gross Rent			\$873
			Families Below Poverty Level			6.83
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Nebraska

The Nebraska non-MSA and Lincoln-Beatrice CSA AAs received a full-scope review. The Omaha MSA and Grand Island MSA AAs received limited scope reviews. The Nebraska non-MSA contains the largest percent of total deposits, total loans by number, and total loans by dollar at 61.5 percent, 55.5 percent and 56.8 percent, respectively. The Lincoln-Beatrice CSA AA contains the second largest percent of total deposits, total loans by number and, total loans by dollar at 15.8 percent, 31.5 percent, and 29.8 percent, respectively. The Omaha MSA, only has one branch location and contains the lowest percent of total deposits, total loans by dollar and total loans by number at 2.6 percent, 3.2 percent, and 6.2 percent, respectively. The Grand Island MSA AA is not a major market for the institution either with percentages of total deposits, total loans by dollar, and total loans by number at 11.2 percent, 3.3 percent, and 4.3 percent, respectively.

In the Nebraska non-MSA, small loans to farms are the primary loan product by dollar and number. In the Lincoln-Beatrice CSA, small loans to businesses are the primary loan product by dollar and number. In the Grand Island MSA, small loans to farm are the primary product by dollar and number. In the Omaha MSA, small loans to businesses are the primary loan by dollar and consumer loans are the primary loan product by number.

The Nebraska non-MSA AA receives greater weight in the lending test conclusion as more of the bank's loans by dollar, \$181.8 million, and by number, 1399, were originated or purchased in this AA over the Lincoln-Beatrice CSA having originated or purchased 735 loans by number or \$103.2 million by dollar.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Nebraska non-MSA and Lincoln-Beatrice CSA AAs was good.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in Nebraska. The Nebraska non-MSA presents reasonable distribution by income level of the geography, while the Lincoln-Beatrice CSA is poor.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the Lincoln-Beatrice CSA is poor. The 1.69 percent of loans originated or purchased to businesses in a low-income census tract is materially lower than the 5.64 percent of small businesses in the AA's low-income census tracts. WNB originated no loans to small businesses in moderate-income tracts.

Small Loans to Farms

Refer to Table 11 in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms in the Nebraska non-MSA is reasonable. The 3.8 percent of loans originated or purchased to farms in a moderate-income census tract is reasonably close to the 4.7 percent of farms in the AA. There are no low-income tracts in the AA.

Lending Gap Analysis

Examiners analyzed WNB's lending patterns and reviewed a sample of small loans to businesses and farms. We analyzed the location of the borrowers, including their census tracts and compared them to maps of each AA. We did not identify any significant unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

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

WNB exhibited an excellent distribution of loans to small businesses with less than \$1 million in annual revenue in the Lincoln-Beatrice CSA. WNB originated 88.1 percent of the small business loans in the AA were to businesses with less than \$1 million in gross annual revenue, this exceeds the percent of businesses in the AA with gross annual revenues less than \$1 million at 78.3 percent significantly exceeded the aggregate lending.

Small Loans to Farms

Refer to Table 12 in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

WNB exhibited an excellent distribution of loans to small farms with less than \$1 million in annual revenue in the Nebraska non-MSA AA. WNB originated 100 percent of the small loans to farms in the AA farm loans originated or purchased in the AA were for small farms with less than \$1 million in annual revenue, this exceeds the percent of businesses in the AA with annual revenues less than \$1 million at 92.1 percent.

Responses to Complaints

WNB nor the OCC received any written complaints about WNB's CRA performance during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Grand Island MSA AA and Omaha MSA AA was consistent with the bank's overall performance under the Lending Test in the full scope areas.

State of Kansas

CRA rating for the State of (name of state)²: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- WNB exhibited a reasonable distribution of loans to small farms with less than \$1 million in annual revenue in the Kansas non-MSA AA.
- 80 percent of the farm loans originated or purchased in the AA were for small farms with less than \$1 million in annual revenue.

Description of Institution's Operations in Kansas

Kansas non-MSA

The Kansas non-MSA comprises Marshall County and is the only AA in Kansas. The AA includes one branch in Summerfield with one ATM located in the branch. The county consists of four CTs, all middle-income, none are distressed or underserved.

US Census demographic information, presented in the table below, shows a population of 10,038 and a median family income of \$80,900 in 2024. The AA has 9.2 percent of households below the poverty level and 4.1 percent of families below the poverty level.

The unemployment rate for the AA is 2.5percent. The US Bureau of Labor Statistics presents the Kansas unemployment rate at 3.8 percent, and the national unemployment rate at 4.1 percent both as of December 2024. The 2023 US Census information reports, manufacturing, retail trade, and health care and social assistance comprise the primary types of employment in the AA.

The 2024 FDIC Deposit Market Share Report shows seven other financial institutions with 12 branches competing in the county. WNB ranked third to last with \$19.3 million in deposits within the AA, representing 2.9 percent market share. The leading financial institution in the area has \$274.5 million in deposits within the AA, representing 41.0 percent market share.

Examiners utilized one community contact within the AA. The contact was from the United States Department of Agriculture Farm Services Agency. The contact identified agricultural financing as a need and a potential opportunity for local financial institutions. The contact noted local financial institutions are very engaged with local communities and willing to extend credit to those who qualify.

The following table provides a summary of demographics for the Kansas non-MSA.

Assessment Area(s) – KS non-MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.00	0.00	100.00	0.00	0.00
Population by Geography	10,308	0.00	0.00	100.00	0.00	0.00
Housing Units by Geography	4,925	0.00	0.00	100.00	0.00	0.00

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

Assessment Area(s) – KS non-MSA						
2022-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Housing by Geography	3,240	0.00	0.00	100.00	0.00	0.00
Occupied Rental Units by Geography	888	0.00	0.00	100.00	0.00	0.00
Vacant Units by Geography	797	0.00	0.00	100.00	0.00	0.00
Businesses by Geography	471	0.00	0.00	100.00	0.00	0.00
Farms by Geography	129	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	2,558	15.05	18.06	24.16	42.73	0.00
Household Distribution by Income Level	4,128	19.79	19.45	19.14	41.62	0.00
Unemployment rate (%)	2.54	0.00	0.00	2.54	0.00	0.00
Households Below Poverty Level (%)	9.23	0.00	0.00	9.23	0.00	0.00
Median Family Income (non-MSAs - KS)		\$65,183			Median Housing Value	\$106,100
Median Family Income (non-MSAs - KS) for 2024		\$80,900			Median Gross Rent	\$581
				Families Below Poverty Level		4.10
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Kansas

The Kansas non-MSA received a full-scope review as this is the only AA in Kansas.

LENDING TEST

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

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Kansas non-MSA AA was good.

Distribution of Loans by Income Level of the Geography

An analysis of the geographic distribution in Kansas was not completed. There are no low- or moderate-income CTs in the Kansas non-MSA AA.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Farms

Refer to Table 12 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

WNB exhibited a reasonable distribution of loans to small farms with less than \$1 million in annual revenue in the Kansas non-MSA AA. WNB originated 80 percent of the farm loans in the AA for small farms with less than \$1 million in annual revenue. This is near to the percent of businesses in the AA with annual revenues less than \$1 million at 91.7 percent and significantly exceeds the aggregate lending.

Responses to Complaints

WNB nor the OCC received any written complaints about WNB's CRA performance during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2022 to 12/31/24	
Bank Products Reviewed:	Small business, small farm, consumer loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Nebraska		
Nebraska non-MSA	Full-scope	
Lincoln-Beatrice CSA	Full-scope	
Grand-Island MSA	Limited-scope	
Omaha MSA	Limited-scope	
Kansas		
Kansas non-MSA	Full-scope	

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Western National Bank	Satisfactory
MMSA or State:	
Nebraska	Satisfactory
Kansas	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/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: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 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 9. 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 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.
- Table 12. 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 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Nebraska

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Lincoln-Beatrice CSA	59	\$3,634,920	71.08	11,769	5.64	1.69	3.67	17.83	0.00	17.16	34.88	88.14	34.29	39.05	10.17	43.10	2.60	0.00	1.77
Omaha MSA	24	\$2,288,408	28.92	1,019	--	0.00	--	11.04	0.00	12.46	68.91	45.83	61.92	20.06	54.17	25.61	--	0.00	--
Total	83	\$5,923,328	100.00	12,788	5.64	1.20	3.67	14.44	0.00	14.81	51.90	75.91	48.11	29.56	22.89	34.36	2.60	0.00	1.77

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lincoln-Beatrice CSA	59	\$3,634,920	71.08	11,769	78.26	88.14	54.36	10.30	10.17	11.44	1.69
Omaha MSA	24	\$2,288,408	28.92	1,019	80.97	83.33	55.15	8.99	8.33	10.04	8.33
	83	\$5,923,328	100.00	16,190	77.56	86.75	53.89	10.34	9.64	12.10	3.61
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
NE non-MSA	53	\$5,879,980	74.65	531	--	0.00	--	4.72	3.77	7.16	50.20	69.81	66.29	45.08	26.42	26.55	--	0.00	--
Grand Island MSA	18	\$989,383	25.35	470	--	0.00	--	9.57	0.00	2.55	75.60	94.44	87.45	14.83	5.56	10.00	--	0.00	--
Total	71	\$6,869,363	100.00	1001	--	0.00	--	7.15	2.81	4.86	49.23	76.05	76.87	42.44	21.13	18.28	--	0.00	--

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022-2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
NE non-MSA	53	\$5,879,980	74.65	531	92.07	100.00	48.96	7.07	0.00	0.86	0.00
Grand Island MSA	18	\$989,383	25.35	470	85.40	83.33	59.36	13.02	0.00	1.59	16.67
Total	71	\$6,869,363	100.00	1001	88.74	95.77	54.16	10.05	0.00	1.23	4.23
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-2024
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Omaha MSA	60	\$830,026.00	100.00	--	--	17.87	0.00	62.07	26.67	20.06	73.33	--	--
Total	60	\$830,026.00	100.00	5.59	--	17.87	0.00	60.07	26.67	20.06	73.33	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Omaha MSA	60	\$830,026	100.00	18.61	0	18.18	0	19.36	0	43.85	100	--	--
Total	60	\$830,026	100.00	18.61	0	18.18	0	19.36	0	43.85	100	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

Kansas

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Kansas non-MSA	20	4,857,562.00	100.00%	101	--	--	--	--	--	--	100.00	100.00	100.00	--	--	--	--	--	--
Total	20	4,857,562.00	100.00%	101	--	--	--	--	--	--	100.00	100.00	100.00	--	--	--	--	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue 2022-2024											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas non-MSA	20	4,857,562	100.00%	101	91.71	80.00	24.75	8.29	20.00	--	--
Total	20	4,857,562	100.00%	101	91.71	80.00	24.75	8.29	20.00	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											