



PUBLIC DISCLOSURE

October 28, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American National Bank
Charter Number: 15435

8990 West Dodge Road
Omaha, NE 68114

Office of the Comptroller of the Currency

13710 FNB Parkway, Suite 110
Omaha, NE 68154

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

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Overall CRA Rating

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

The following table indicates the performance level of American National Bank (ANB) with respect to the Lending, Investment, and Service Tests:

| Performance Levels | American National Bank Performance Tests | | |
|---------------------------|---|-----------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | X | | |
| High Satisfactory | | | X |
| Low Satisfactory | | X | |
| 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 a combination of the Omaha-Council Bluffs NE-IA Multistate Metropolitan Statistical Area (Omaha MMSA), Minnesota, and Nebraska ratings. Performance in the Omaha MMSA is weighted most heavily because it represents the bank’s primary area with 64 percent of branch locations, 71 percent of deposit volume as of June 30, 2018, and 64 percent of the home mortgage, small business, and small farm loan volume by dollar during the evaluation period. Performance in the State of Minnesota receives the second most weight as it represents 18 percent of branch locations, 22 percent of deposit volume as of June 30, 2018, and 30 percent of the home mortgage, small business, and small farm loan volume by dollar during the evaluation period. Performance in the State of Nebraska receives the least weight. While the State of Nebraska represents 18 percent of branch locations, it represents only seven percent of deposit volume as of June 30, 2018, and seven percent of home mortgage, small business, and small farm loan volume by dollar during the evaluation period.

Performance under the Lending Test is outstanding. Lending activity is excellent, a high percentage of loans are originated to borrowers located within the bank’s assessment areas (AAs), the geographic distribution of loans is excellent, and the borrower distribution of loans is good. ANB is a leader in providing community development (CD) loans to address the needs of its AAs.

- The Investment Test rating is based on a combination of the Omaha MMSA, Minnesota, and Nebraska ratings. Performance in the Investment Test is weighted in the same manner as the Lending Test.

Performance under the Investment Test is adequate. The volume of CD investment and grant activity adequately meets the CD needs of ANB’s AAs.

- The Service Test rating is based on a combination of the Omaha MMSA, Minnesota, and Nebraska ratings. Performance in the Service Test is weighted in the same manner as the Lending Test.

Performance under the Service Test is good. ANB’s branch and deposit-taking automated teller machine (ATM) locations are accessible to geographies and individuals of different income levels in the bank’s AAs. Changes in branch locations did not have an adverse effect on the accessibility of delivery systems. The range of services and business hours does not vary in a way that inconveniences low- and moderate-income (LMI) geographies or individuals. ANB is a leader in providing CD service hours to its AAs.

In addition to the activities at the state and MMSA level, we considered the following activities at the bank-wide level:

- ANB uses flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals. ANB offers Veteran’s Administration, Federal Housing Administration, United States Department of Agriculture, and Small Business Administration loans in each of its AAs. During the evaluation period, management originated 822 of these loans totaling \$129.7 million.
- ANB offers a full line of deposits such as checking accounts, savings accounts, certificates of deposit, individual retirement accounts, and health savings accounts. Retail banking services targeted to LMI individuals, but available to all customers, include free checking accounts and basic savings accounts, which have a low minimum amount to open and avoid fees.
- ANB offers alternative delivery systems that are available to all individuals and geographies including mobile banking, online banking, and telephone banking.
- ANB originated and purchased a high percentage of its loans within the bank’s AAs during the evaluation period.

Lending in AAs

A high percentage of the bank’s loans are in its AAs.

Management originated and purchased 80.7 percent of its total loans by number and 76.2 percent of its total loans by dollar inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level, and does not include affiliate loan data.

| Lending Inside and Outside of the AA | | | | | | | | | | |
|---|-----------------|------|---------|------|---------|---------------------------------|------|---------|------|----------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 2,954 | 86.8 | 449 | 13.2 | 3,403 | 622,468 | 85.7 | 103,786 | 14.3 | 726,254 |
| Small Business | 2,031 | 71.3 | 817 | 28.7 | 2,848 | 428,001 | 64.0 | 240,947 | 36.0 | 668,948 |
| Small Farm | 615 | 89.8 | 70 | 10.2 | 685 | 87,748 | 88.4 | 11,560 | 11.6 | 99,308 |
| Total | 5,600 | 80.7 | 1,336 | 19.3 | 6,936 | 1,138,217 | 76.2 | 356,293 | 23.8 | 1,494,510 |

Description of Institution

ANB is a \$3.7 billion interstate institution headquartered in Omaha, Nebraska. ANB is a wholly-owned subsidiary of a one-bank holding company, American National Corporation (ANC), also located in Omaha, Nebraska. As of December 31, 2018, ANC had total assets of \$3.7 billion. The AAs and scope of this examination were adjusted to reflect the bank's acquisition activity during the evaluation period. ANB acquired Stonebridge Bank on September 30, 2016. The acquisition expanded ANB's presence in the Minneapolis-St. Paul-Bloomington MN-WI Multistate Metropolitan Statistical Area (Minneapolis MMSA). ANB closed two branches in the Omaha MMSA during the evaluation period.

Affiliate activities were considered when evaluating CD loans, investments, and services. The review included an assessment of the affiliate's ability to lend or invest in ANB's AAs. We considered activities performed by the American National Community Development Corporation (ANCDC) during the evaluation period. ANCDC was established by ANC in 2004 to promote public welfare by making investments designed primarily to benefit LMI areas or individuals through the development of affordable housing and fostering revitalization or stabilization of LMI areas.

For purposes of the CRA, ANB operates with three rating areas and four AAs. The rating areas include the Omaha MMSA, State of Minnesota, and State of Nebraska. The AAs include the Omaha MMSA AA, the Lincoln Metropolitan Statistical Area (MSA) AA, the Nebraska Non-MSA AA, and the Minneapolis MSA AA. The Minneapolis MSA AA is part of the Minneapolis MMSA; however, ANB's operations are limited to the Minnesota portion of the MMSA.

ANB operated 37 branches in Nebraska, Iowa, and Minnesota during the evaluation period. The majority of ANB's branches are located in Nebraska with 16 branches located within the Omaha metropolitan area and one branch in each of the following towns: Elk Creek, Fairbury, Falls City, Humboldt, Lincoln, Nebraska City, and Tecumseh. ANB operated seven branches in Iowa, all of which are included in the Omaha MMSA, and seven branches in Minnesota, all of which are included in the Minneapolis MMSA. ANB operated 95 ATMs during the evaluation period. Fifty-seven of the ATMs, including the bank's four deposit-taking ATMs, were located in the Omaha MMSA, 11 were located in the State of Nebraska, and seven were located in the Minneapolis MSA AA. Refer to the MMSA or State rating sections of this Evaluation for details of the bank's performance by AA.

ANB offers a full range of credit products within its AAs, including agricultural, commercial, consumer, and real estate loans. ANB has developed well-established niche markets in automobile dealer paper, commercial relationship banking, truck financing, and residential mortgage originations. Net loans represent 77.7 percent of total assets as of December 31, 2018. By dollar volume, the loan portfolio is comprised of the following types of credit: 54 percent commercial and commercial real estate, 24 percent consumer, and 17 percent residential real estate. The following loan segments each represent one percent of the bank's loan portfolio: agricultural, construction and development, and other loans and leases. Tier 1 capital totaled \$343.6 million as of December 31, 2018.

ANB offers a full range of deposit products to businesses and individuals, including alternative retail services such as direct deposit and access to electronic banking services (bill payment, mobile banking, telephone banking, and electronic statements).

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. ANB was last evaluated under the CRA on September 26, 2016, at which time the bank received a rating of Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for lending activities during this examination is January 1, 2016 to December 31, 2018. We reviewed home mortgage, small business, and small farm loans reported by management during the evaluation period. Management elected to not include consumer loans in the scope of the examination. The evaluation period for all CD activities during this examination is September 26, 2016 to December 31, 2018. We reviewed all CD loans, investments, donations, and services submitted by management as part of our examination.

Selection of Areas for Full-Scope Review

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

When determining conclusions, we weighted the bank’s performance in the Omaha MMSA most heavily. The AA represents 64 percent of branch locations, 71 percent of deposit volume as of June 30, 2018, and 64 percent of the home mortgage, small business, and small farm loan volume by dollar during the evaluation period.

When determining conclusions for the Lending Test, we weighted loan products to be reflective of ANB’s loan volume by product type during the evaluation period. Home mortgage loans were weighted most heavily in the Lending Test analysis because they represent 55 percent of total loan originations by dollar and 53 percent of total loan originations by number during the evaluation period. Small loans to businesses were weighted the next highest, as they represented 38 percent of total loans by dollar and 36 percent by number. Small loans to farms carried the least weight in the Lending Test analysis, as they represented eight percent of total loans by dollar and 11 percent by number.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR. 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the

OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution, 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.

Multistate Metropolitan Statistical Area Rating

Omaha-Council Bluffs NE-IA MMSA

CRA rating for the Omaha MMSA¹: Satisfactory
The Lending Test is rated: Outstanding
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the bank's AAs.
- ANB exhibits excellent geographic distribution of loans in the is AAs.
- The institution exhibits good distribution of loans to borrowers of different income levels and businesses and farms of different sizes.
- ANB is a leader in providing CD loans to its AA. Management originated 10 CD loans totaling \$29.1 million in the Omaha MMSA AA during the evaluation period. This represents 11.9 percent of allocated tier 1 capital as of December 31, 2018.
- CD investments represent good responsiveness to AA needs. Management purchased one CD bond and made 288 donations to the AA during the evaluation period. ANB also received credit for five CD bonds purchased in prior periods. In aggregate, CD investments and grants total \$4.3 million and represent 1.8 percent of allocated tier 1 capital as of December 31, 2018.
- ANB is a leader in providing CD service hours to its AA. During the evaluation period, 108 employees provided 2,210 service hours to 60 CD organizations in the Omaha MMSA AA.
- The institution's service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.

Description of Institution's Operations in Omaha MMSA

The Omaha MMSA AA represents ANB's primary area of operations. The Omaha MMSA AA includes Douglas and Sarpy counties in Nebraska and Harrison and Pottawattamie counties in Iowa. ANB operates 23 branches, four deposit-taking ATMs, and 53 cash-dispensing ATMs in the AA. According to 2015 American Community Survey (ACS) data, the Omaha MMSA AA includes 234 census tracts (CTs).

As of June 30, 2018, ANB gathered \$2 billion of deposits in the Omaha MMSA AA. This represents 71 percent of total bank deposits. ANB ranks fifth in deposit market share in the Omaha MMSA AA with a total deposit market share of 6.4 percent.

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

ANB's primary business focus in the Omaha MMSA AA is home mortgage and commercial loans. During the evaluation period, management originated 3,970 Home Mortgage Disclosure Act (HMDA) and CRA reportable loans totaling \$726.7 million. This represents 71 percent of loan originations by number and 64 percent of loan originations by dollar during the evaluation period. Home mortgage loans represent 61 percent of total loan originations within the AA by number and 58 percent of total loan originations within the AA by dollar during the evaluation period.

Competition in the Omaha MMSA AA is strong. According to the June 30, 2018, FDIC Deposit Market Share Report, ANB ranked fifth out of 45 deposit-taking institutions operating in the Omaha MMSA AA. Competitors in the AA who held a greater market share than ANB include First National Bank of Omaha, Mutual of Omaha Bank, Wells Fargo Bank, N.A., and U.S. Bank, N.A. First National Bank of Omaha, Wells Fargo Bank, N.A., and U.S. Bank, N.A. are significantly larger in asset size than ANB and collectively control 48 percent of the deposit market share in the Omaha MMSA AA.

We completed one community contact in the Omaha MMSA AA as part of this examination. The contact was completed via telephone with the Program Manager of an organization that provides affordable housing to LMI individuals in the AA. The contact stated the condition of the local economy is good and identified small business loans as the AA's primary credit need. We also reviewed three community contacts completed in the Omaha MMSA AA within the last year. Those contacts stated that the local economy is strong, and unemployment is low. The contacts identified affordable housing loans and small business loans as primary credit needs.

The following tables provide information on the demographic composition of the Omaha MMSA AA.

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (CTs) | 234 | 12.4 | 21.8 | 39.3 | 26.1 | 0.4 |
| Population by Geography | 784,036 | 9.3 | 21.4 | 39.4 | 29.6 | 0.3 |
| Housing Units by Geography | 321,249 | 10.0 | 23.0 | 41.1 | 25.8 | 0.1 |
| Owner-Occupied Units by Geography | 199,347 | 5.8 | 17.8 | 43.4 | 33.0 | 0.0 |
| Occupied Rental Units by Geography | 97,996 | 15.9 | 31.4 | 38.6 | 14.1 | 0.2 |
| Vacant Units by Geography | 23,906 | 21.3 | 31.8 | 32.7 | 13.8 | 0.5 |
| Businesses by Geography | 47,428 | 7.2 | 18.0 | 43.4 | 31.0 | 0.5 |
| Farms by Geography | 2,213 | 1.9 | 7.8 | 64.2 | 26.1 | 0.0 |
| Family Distribution by Income Level | 194,936 | 21.0 | 17.4 | 22.5 | 39.1 | 0.0 |
| Household Distribution by Income Level | 297,343 | 23.6 | 17.0 | 18.3 | 41.1 | 0.0 |
| Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA | | \$69,538 | Median Housing Value | | | \$146,642 |
| | | | Median Gross Rent | | | \$735 |
| | | | Families Below Poverty Level | | | 8.2% |
| <i>Source: 2010 U.S. Census and 2016 D&B data. Due to rounding, totals may not equal 100.0.</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the AA | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: Omaha MMSA 2017-2018 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 234 | 12.8 | 23.1 | 38.9 | 25.2 | 0.0 |
| Population by Geography | 814,527 | 9.7 | 22.4 | 39.4 | 28.6 | 0.0 |
| Housing Units by Geography | 336,191 | 10.1 | 23.0 | 41.2 | 25.7 | 0.0 |
| Owner-Occupied Units by Geography | 201,940 | 5.1 | 19.7 | 41.4 | 33.8 | 0.0 |
| Occupied Rental Units by Geography | 111,240 | 16.5 | 28.2 | 42.0 | 13.2 | 0.0 |
| Vacant Units by Geography | 23,011 | 22.2 | 26.7 | 35.6 | 15.5 | 0.0 |
| Businesses by Geography | 49,137 | 6.9 | 17.0 | 46.0 | 30.1 | 0.0 |
| Farms by Geography | 2,230 | 2.4 | 11.2 | 53.8 | 32.7 | 0.0 |
| Family Distribution by Income Level | 203,368 | 21.0 | 17.9 | 21.2 | 40.0 | 0.0 |
| Household Distribution by Income Level | 313,180 | 23.7 | 16.8 | 18.3 | 41.2 | 0.0 |
| Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA | | \$73,632 | Median Housing Value | | | \$150,936 |
| | | | Median Gross Rent | | | \$828 |
| | | | Families Below Poverty Level | | | 8.9% |
| <i>Source: 2015 ACS Census and 2018 D&B data. Due to rounding, totals may not equal 100.0.</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Scope of Evaluation in Omaha MMSA

We completed a full-scope review of the Omaha MMSA AA. Refer to the table in Appendix A for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OMAHA MMSA

LENDING TEST

The bank's performance under the Lending Test in the Omaha MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Omaha MMSA AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

| Number of Loans | | | | | |
|------------------------|---------------|----------------|------------|----|-------|
| AA | Home Mortgage | Small Business | Small Farm | CD | Total |
| Omaha MMSA | 2,423 | 1,086 | 461 | 10 | 3,980 |

| Dollar Volume of Loans (in 000s) | | | | | |
|---|---------------|----------------|------------|-----------------------|---------|
| AA | Home Mortgage | Small Business | Small Farm | Community Development | Total |
| Omaha MMSA | 420,964 | 235,904 | 69,785 | 29,078 | 755,731 |

Lending levels in the Omaha MMSA AA reflect excellent responsiveness to AA credit needs. During the evaluation period, management originated 2,423 home loans totaling \$421 million, 1,086 small business loans totaling \$235.9 million, 461 small farm loans totaling \$69.8 million, and 10 CD loans totaling \$29.1 million. Based on the FDIC Market Share report from June 30, 2018, there are 45 deposit-taking institutions with one or more banking offices in the Omaha MMSA AA. ANB ranks fifth with a deposit market share of 6.4 percent.

ANB's lending market share is excellent compared to its deposit market share in the Omaha MMSA AA. Peer home mortgage data for 2018 indicates ANB ranks eleventh among 383 lenders that reported home purchase loans with a market share of 1.7 percent based on the number of loans. This is the equivalent to the top three percent of lenders in the AA. Peer small business loan data for 2018 indicates ANB ranks tenth among 106 lenders that reported small business loans with a market share of 2.6 percent based on the number of loans. This is the equivalent to the top 10 percent of lenders in the AA. Peer small loans to farms data for 2018 indicates ANB ranks first among 17 lenders that reported small loans to farms with a market share of 24.4 percent based on the number of loans. Given the competition from other reporting lenders in the AA, the bank's higher lender rankings are excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Loans originated in 2016 are compared to 2010 United States Census (2010 Census) data and loans originated in 2017 and 2018 are compared to 2011-2015 ACS (2015 ACS) data and, therefore, were evaluated separately.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans to CTs of different income levels in the Omaha MMSA is excellent.

In 2016, ANB originated 3.3 percent of home loans to borrowers located in a low-income geography. 2010 Census data indicates 5.8 percent of owner-occupied units are located in a low-income geography. Aggregate HMDA data indicates 3.1 percent of home loans were originated to borrowers located in a low-income geography. ANB originated 18.4 percent of home loans to borrowers located in a moderate-income geography. The 2010 Census data indicates 17.8 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data shows 12.8 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

In 2017-2018, ANB originated 3.3 percent of home loans to borrowers located in a low-income geography. The 2015 ACS data indicates 5.1 percent of owner-occupied units are located in a low-income geography. Aggregate HMDA data indicates 3.9 percent of home loans were originated to borrowers located in a low-income geography. ANB originated 25.1 percent of home loans to

borrowers located in a moderate-income geography. The 2015 ACS data indicates 19.7 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data shows 17.1 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

Small Loans to Businesses

Refer to Table Q in the “MMSA” 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 Omaha MMSA AA is excellent.

In 2016, ANB originated 12.1 percent of small loans to businesses located in a low-income geography. 2010 Census data indicates 7.2 percent of businesses are located in a low-income geography. Aggregate CRA data indicates 5.8 percent of small loans to businesses in the AA were originated to businesses located in a low-income geography. ANB originated 15.1 percent of small loans to businesses located in a moderate-income geography. 2010 Census data indicates 18.0 percent of businesses are located in a moderate-income geography. Aggregate CRA data indicates 14.6 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income geography.

In 2017-2018, ANB originated 10.6 percent of small loans to businesses located in a low-income geography. The 2015 ACS data indicates 6.9 percent of small loans to businesses are located in a low-income geography. Aggregate CRA data indicates 6.1 percent of small loans to businesses in the AA were originated to businesses located in a low-income geography. ANB originated 15.8 percent of small loans to businesses located in a moderate-income geography. The 2015 ACS data indicates 17.0 percent of businesses are located in a moderate-income geography. Aggregate CRA data indicates 14.7 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income geography.

Small Loans to Farms

Refer to Table S in the “MMSA” 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 Omaha MMSA AA is very poor.

In 2016, ANB did not originate any small loans to farms located in an LMI geography. The 2010 Census data indicates 1.9 percent of farms are located in a low-income geography and 7.8 percent of farms are located in a moderate-income geography. Aggregate CRA data indicates 0.6 percent of small loans to farms in the AA were originated to farms located in a low-income geography and 2.0 percent of small loans to farms in the AA were originated to farms located in a moderate-income geography.

In 2017-2018, ANB did not originate any small loans to farms located in a low-income geography. 2015 ACS data indicates 2.4 percent of farms are located in a low-income geography. Aggregate CRA data indicates 0.3 percent of small loans to farms in the AA were originated to farms located in a low-income geography. ANB originated 1.4 percent of small loans to farms located in a moderate-income geography. 2015 ACS data indicates 11.2 percent of farms are located in a moderate-income geography. Aggregate CRA data indicates 12.1 percent of small loans to farms in the AA were originated to farms located in a moderate-income geography.

Lending Gap Analysis

Data detailing ANB's lending activity during the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms did not reveal any conspicuous gaps in the bank's lending activity. ANB originated at least one home mortgage loan, small loan to a business, or small loan to a farm in all but three CTs in the Omaha MMSA AA during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Loans originated in 2016 are compared to 2010 Census data and loans originated in 2017 and 2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Home Mortgage Loans

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

The distribution of home mortgage loans to borrowers of different income levels in the Omaha MMSA AA is excellent.

In 2016, ANB originated 11.8 percent of home mortgage loans to low-income borrowers. The 2010 Census data indicates 21.0 percent of families are low-income. Aggregate HMDA data indicates 7.0 percent of loans were made to low-income borrowers. ANB made 25.0 percent of home mortgage loans to moderate-income borrowers. The 2010 Census data indicates 17.4 percent of families are moderate-income. Aggregate HMDA data indicates 16.3 percent of home loans were made to moderate-income borrowers.

In 2017-2018, ANB originated 15.9 percent of home mortgage loans to low-income borrowers. The 2015 ACS data indicates 21.0 of families are low-income. Aggregate HMDA data indicates 8.8 percent of home loans were made to low-income borrowers. ANB originated 26.3 percent of home mortgage loans to moderate-income borrowers. The 2015 ACS data indicates 17.9 percent of families are moderate-income. Aggregate HMDA data indicates 20.7 percent of home loans were to moderate-income borrowers.

Small Loans to Businesses

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

The distribution of small loans to businesses of different sizes in the Omaha MMSA AA is adequate.

In 2016, ANB originated 52.5 percent of small business loans to businesses with gross annual revenues of \$1 million or less. The 2010 Census data indicates 79.8 percent of businesses in the AA had revenues of \$1 million or less. Aggregate CRA data indicates 41.3 percent of small business loans were originated to businesses with revenues of \$1 million or less.

By loan size, 44.3 percent of ANB's business loans were \$100 thousand or less. Aggregate CRA data indicates 91.3 percent of business loans originated in the AA were \$100 thousand or less. Twenty-six percent of ANB's business loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 4.1 percent of business loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Thirty percent of ANB's business loans were greater than \$250 thousand. Aggregate CRA data indicates 4.6 percent of business loans originated in the AA were greater than \$250 thousand.

In 2017-2018, ANB originated 47.4 percent of small business loans to businesses with revenues of \$1 million or less. The 2015 ACS data indicates 79.9 percent of businesses in the AA had revenues of \$1 million or less. Aggregate CRA data indicates 48.0 percent of small business loans were originated to businesses with revenues of \$1 million or less.

By loan size, 47.2 percent of ANB's business loans in 2017-2018 were \$100 thousand or less. Aggregate CRA data indicates 90.5 percent of business loans originated in the AA were \$100 thousand or less. Twenty-five percent of ANB's business loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 4.5 percent of business loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Twenty-eight percent of ANB's business loans were greater than \$250 thousand. Aggregate CRA data indicates 5.0 percent of business loans originated in the AA were greater than \$250 thousand.

Small Loans to Farms

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

The distribution of small loans to farms of different sizes in the Omaha MMSA AA is good.

In 2016, ANB originated 94.1 percent of small farm loans to farms with gross annual revenues of \$1 million or less. The 2010 Census data indicates 96.8 percent of AA farms had revenues of \$1 million or less. Aggregate CRA data indicates 67.4 percent of small farm loans were made to farms with revenues of \$1 million or less.

By loan size, 51.4 percent of ANB's farm loans were \$100 thousand or less. Aggregate CRA data indicates 65.8 percent of farm loans originated in the AA were \$100 thousand or less. Thirty percent of ANB's farm loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 22.3 percent of farm loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Nineteen percent of ANB's farm loans were greater than \$250 thousand. Aggregate CRA data indicates 11.9 percent of farm loans originated in the AA were greater than \$250 thousand.

In 2017-2018, ANB originated 93.8 percent of small farm loans to farms with gross annual revenues of \$1 million or less. The 2015 ACS data indicates 96.4 percent of AA farms had revenues of \$1 million or less. Aggregate CRA data indicates 64.1 percent of small farm loans were made to farms with revenues of \$1 million or less.

By loan size, 47.8 percent of ANB's farm loans in 2017-2018 were \$100 thousand or less. Aggregate CRA data indicates 70.2 percent of farm loans originated in the AA were \$100 thousand or less. Thirty

percent of ANB's farm loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 18.7 percent of farm loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Twenty-three percent of ANB's farm loans were greater than \$250 thousand. Aggregate CRA data indicates 11.1 percent of farm loans originated in the AA were greater than \$250 thousand.

CD Lending

The institution is a leader in making CD loans. The volume of loans represents excellent responsiveness to the credit needs of the highly economically disadvantaged, low-income individuals, or small farms and businesses in the AA.

The Lending Activity Tables shown above set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans, that also qualify as CD loans.

Management originated 10 CD loans totaling \$29.1 million during the evaluation period. This represents 11.9 percent of allocated tier 1 capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Omaha MMSA AA. CD loan originations exhibit excellent responsiveness to CD needs within the AA. Five of the CD loans support affordable housing within the AA, four provided funding to community service organizations, and one supported economic development. ANB's level of CD lending had a significantly positive impact on the bank's Lending Test rating.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

In addition to the flexible lending programs already discussed, ANB offers flexible home mortgage lending programs including the Nebraska and Iowa Finance Authority programs and Nebraska Dollar and Energy Saving loan program. Flexible farm loans are offered through the Agri-Access program. During the evaluation period, management originated 326 flexible loans in the Omaha MMSA AA totaling \$34.5 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the Omaha MMSA AA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the Omaha MMSA AA is adequate.

ANB has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. ANB occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|------------------------|-----------|
| AA | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Omaha MMSA | 5 | \$2,783 | 268 | \$1,414 | 273 | 100.0 | 4,197 | 100.0 | -- | -- |

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

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

ANB's investments and donations demonstrate good responsiveness to community needs and opportunities in the Omaha MMSA AA. Donations and investments totaled \$4.2 million during the evaluation period. This represents 1.7 percent of allocated tier 1 capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Omaha MMSA AA.

During the evaluation period, management purchased one qualified CD bond totaling \$740 thousand that provided funding for affordable housing to the Omaha MMSA AA. In addition, management received credit for five qualified investments totaling \$2.8 million that were purchased in prior periods and are still outstanding. These investments support the revitalization/stabilization of a moderate-income CT, community services, and affordable housing.

Management provided 267 donations totaling \$674 thousand to 106 qualified CD organizations during the evaluation period. A majority of the donations (251 donations totaling \$616 thousand) support community service agencies. Fifteen of the donations totaling \$53 thousand support affordable housing. One donation totaling \$5 thousand provided funds to help revitalize/stabilize LMI geographies in the Omaha MMSA AA.

SERVICE TEST

The institution's performance under the Service Test in the Omaha MMSA AA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Omaha MMSA AA is good.

Retail Banking Services

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

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--|--------------------------|--|--|------|------|------|--|------|------|------|
| AA | Deposits % of Rated Area Deposits in AA | # of Bank Branches | % of Rated Area Branches in AA | Branches | | | | Population | | | |
| | | | | Location of Branches by Income of Geographies (%) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Omaha MMSA | 100.0 | 23 | 100.0 | 8.7 | 13.0 | 56.5 | 21.8 | 9.7 | 22.4 | 39.4 | 28.5 |

ANB's service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the Omaha MMSA AA. There are 23 branches in the Omaha MMSA AA. As of 2018, two branches are located in low-income CTs, three are located in moderate-income CTs, 13 are located in middle-income CTs, and five are located in upper-income CTs. ANB's branch distribution compares reasonably to 2015 ACS data indicating that 9.7 percent of the population lives in low-income CTs and 22.4 percent of the population lives in moderate-income CTs.

In addition to ANB's traditional branch structure, the institution operates four deposit-taking ATMs. Three of the deposit-taking ATMs are located in middle-income CTs and one is located in an upper-income CT.

| Distribution of Branch Openings/Closings | | | | | | |
|---|----------------------|----------------------|---|-----|-----|-----|
| Branch Openings/Closings | | | | | | |
| AA | # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| Omaha MMSA | -- | 2 | -- | -- | -2 | -- |

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

ANB did not open any branches in the Omaha MMSA AA during the evaluation period. ANB closed two branches in the Omaha MMSA AA during March 2017. Both branches were located in middle-income CTs in the AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

Lobby and drive-up hours are similar between all branches in the AA. Each of the bank's branches offer weekday lobby and drive-up service hours. Lobby hours on Saturday are the same for all of the bank's branches in the Omaha MSA AA. Saturday drive-up hours vary only slightly. ANB offers its full range of deposit products at each branch location, with the exception of retail non-deposit investment sales. Initial contact for all loan products, including consumer, home mortgage, commercial, and agricultural, can be made at any branch.

CD Services

The institution is a leader in providing CD services.

Employees provide expertise to a variety of organizations that provide community services and affordable housing to LMI individuals. During the evaluation period, 108 employees provided 2,210 service hours to 60 qualified CD organizations in the Omaha MMSA AA. Many bank employees

provided service hours to a specific organization for multiple years in the evaluation period and multiple bank representatives assumed leadership roles within the specific CD organizations they were supporting.

State Rating

State of Minnesota

CRA rating for the State of Minnesota²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in the bank's AA.
- ANB demonstrates excellent geographic distribution of loans in its AA.
- The institution is a leader in providing CD loans to its AA. Management originated eight CD loans totaling \$23.8 million in the State of Minnesota during the evaluation period. This represents 31.4 percent of allocated tier 1 capital as of December 31, 2018.
- CD investments represent adequate responsiveness to AA needs. Management made 49 donations to the AA during the evaluation period. ANB also received credit for one CD bond purchased in prior periods. In aggregate, CD investments and grants total \$881 thousand and represent 1.2 percent of allocated tier 1 capital as of December 31, 2018.
- The institution's service delivery systems are readily accessible to geographies and individuals on different income levels.
- ANB provides a relatively high level of CD service hours to its AA. During the evaluation period, 12 employees provided 245 service hours to 27 CD organizations in the State of Minnesota.

Description of Institution's Operations in Minnesota

ANB's operations in Minnesota are limited to the Minnesota portion of the Minneapolis MMSA. The Minneapolis MSA AA includes Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties. ANB operates seven branches and seven cash-dispensing ATMs in the AA. According to 2015 ACS data, the Minneapolis MSA AA includes 704 CTs.

As of June 30, 2018, ANB gathered \$613.1 million of deposits in the Minneapolis MSA AA. This represents 22 percent of total bank deposits. ANB ranks 18th in deposit market share in the Minneapolis MSA AA with a total deposit market share of 0.3 percent.

ANB's primary business focus in the Minneapolis MSA AA is commercial and home mortgage loans. During the evaluation period, management originated 1,135 HMDA and CRA reportable loans totaling \$336.1 million. This represents 20 percent of loan originations by number and 30 percent of loan originations by dollar during the evaluation period. Commercial loans represent 74 percent of total loan

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.

originations within the AA by number and 51 percent of total loan originations by dollar within the AA during the evaluation period.

Competition in the Minneapolis MSA AA is strong. According to the June 30, 2018, FDIC Deposit Market Share Report, ANB ranked 18th out of 113 deposit-taking institutions operating in the Minneapolis MSA AA. Competitors in the AA with the greatest deposit market share include U.S. Bank, N.A. and Wells Fargo Bank, N.A. Combined, these two institutions control 76 percent of the AA's market share. TCF National Bank and Bremer Bank, N.A. are also much larger than ANB, and control an additional six percent of the AA's deposit market share.

We completed two community contacts in the Minneapolis MSA AA as part of this examination. The first contact was completed via telephone with the Chief Executive Officer (CEO) of an organization that assists small businesses in obtaining financing. The contact stated the condition of the local economy is strong. The second contact was completed via telephone with the CEO of an organization that provides job training to LMI individuals. The contact stated that the overall economy is strong; however, many neighborhoods within the AA are poor. We also reviewed two community contacts completed in the Minneapolis MSA AA within the last year. Those contacts stated that the local economy is strong with businesses expanding and the housing market flourishing. Credit needs include new business funding and home mortgage loans.

The following tables provide information on the demographic composition of the Minneapolis MSA AA.

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|---|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (CTs) | 704 | 8.9 | 19.5 | 41.8 | 29.3 | 0.6 |
| Population by Geography | 2,849,567 | 7.2 | 17.1 | 42.8 | 32.8 | 0.1 |
| Housing Units by Geography | 1,177,896 | 7.2 | 18.3 | 43.9 | 30.6 | 0.0 |
| Owner-Occupied Units by Geography | 790,821 | 2.9 | 13.9 | 46.2 | 37.0 | 0.0 |
| Occupied Rental Units by Geography | 319,896 | 16.5 | 28.2 | 39.2 | 16.0 | 0.0 |
| Vacant Units by Geography | 67,179 | 13.2 | 23.7 | 38.6 | 24.5 | 0.0 |
| Businesses by Geography | 208,177 | 5.1 | 15.7 | 42.1 | 37.0 | 0.0 |
| Farms by Geography | 5,005 | 1.9 | 10.3 | 48.7 | 39.2 | 0.0 |
| Family Distribution by Income Level | 705,812 | 19.1 | 17.2 | 22.6 | 41.1 | 0.0 |
| Household Distribution by Income Level | 1,110,717 | 22.9 | 16.4 | 19.2 | 41.6 | 0.0 |
| Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA | | \$79,301 | Median Housing Value | | | \$258,801 |
| | | | Median Gross Rent | | | \$865 |
| | | | Families Below Poverty Level | | | 6.5% |

*Source: 2010 U.S. Census and 2016 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 AA | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: Minneapolis MSA 2017-2018 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 704 | 8.0 | 23.2 | 41.9 | 26.0 | 1.0 |
| Population by Geography | 2,952,114 | 6.8 | 20.4 | 42.7 | 29.8 | 0.3 |
| Housing Units by Geography | 1,206,738 | 6.3 | 21.2 | 43.9 | 28.2 | 0.4 |
| Owner-Occupied Units by Geography | 785,412 | 2.5 | 16.5 | 46.3 | 34.6 | 0.1 |
| Occupied Rental Units by Geography | 364,742 | 13.6 | 31.0 | 39.1 | 15.4 | 0.9 |
| Vacant Units by Geography | 56,584 | 11.1 | 24.2 | 41.2 | 22.6 | 0.9 |
| Businesses by Geography | 219,837 | 5.2 | 17.7 | 44.6 | 32.2 | 0.4 |
| Farms by Geography | 5,217 | 1.9 | 12.2 | 51.1 | 34.8 | 0.1 |
| Family Distribution by Income Level | 730,755 | 20.4 | 17.0 | 21.7 | 41.0 | 0.0 |
| Household Distribution by Income Level | 1,150,154 | 23.9 | 16.1 | 18.2 | 41.8 | 0.0 |
| Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA | | \$85,636 | Median Housing Value | | | \$232,413 |
| | | | Median Gross Rent | | | \$966 |
| | | | Families Below Poverty Level | | | 7.1% |
| <i>Source: 2015 ACS Census and 2018 D&B data. Due to rounding, totals may not equal 100.0.</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Scope of Evaluation in Minnesota

We completed a full-scope review of the Minneapolis MSA AA. Refer to the table in Appendix A for additional information.

When determining conclusions for the Lending Test, we weighted loan products to be reflective of ANB's loan volume by product type during the evaluation period. Small business loans were weighted most heavily in the Lending Test analysis because they represent 74 percent of total loan originations by number and 51 percent of total loan originations by dollar during the evaluation period. Home mortgage loans represented the remaining weight. We did not analyze small farm loans in the Minneapolis MSA AA. The analysis was omitted because it would not provide meaningful information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA AA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

| Number of Loans | | | | | | | |
|------------------------|---------------|----------------|------------|----|-------|---------------|------------------|
| AA | Home Mortgage | Small Business | Small Farm | CD | Total | % State Loans | % State Deposits |
| Minneapolis MSA | 297 | 837 | 1 | 8 | 1,143 | 100.0 | 100.0 |

| Dollar Volume of Loans (in 000s) | | | | | | | |
|---|---------------|----------------|------------|--------|---------|---------------|------------------|
| AA | Home Mortgage | Small Business | Small Farm | CD | Total | % State Loans | % State Deposits |
| Minneapolis MSA | 164,251 | 171,491 | 378 | 23,792 | 359,912 | 100.0 | 100.0 |

Lending levels in the Minneapolis MSA AA reflect good responsiveness to AA credit needs. During the evaluation period, management originated 297 home loans totaling \$164.3 million, 837 small business loans totaling \$171.5 million, one small farm loan totaling \$378 thousand, and eight CD loans totaling \$23.8 million. Based on the FDIC Market Share report from June 30, 2018, there are 113 deposit-taking institutions with one or more banking offices in the Minneapolis MSA AA. ANB ranks 18th with a deposit market share of 0.3 percent.

ANB's lending market share is good compared to its deposit market share in the Minneapolis MSA AA. Peer home mortgage data for 2018 indicates ANB ranks 128th among 654 lenders that reported home purchase loans with a market share of 0.1 percent based on the number of loans. This is the equivalent to the top 20 percent of lenders in the AA. Peer small business loan data for 2018 indicates ANB ranks 21st among 147 lenders that reported small business loans with a market share of 0.6 percent based on the number of loans. This is the equivalent to the top 15 percent of lenders in the AA. Given the competition from other reporting lenders in the AA, the bank's lender ranking is good.

We did not analyze small farm loans in the Minneapolis MSA AA during the evaluation period because the analysis would not be meaningful. Management originated only one small farm loan in the AA during the evaluation period.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Loans originated in 2016 are compared to 2010 Census data and loans originated in 2017 and 2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Home Mortgage Loans

Refer to Table O in the State of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans to CTs of different income levels in the Minneapolis MSA AA is excellent.

In 2016, ANB originated 4.9 percent of home loans to borrowers located in a low-income geography. The 2010 Census data indicates 2.9 percent of owner-occupied units are located in a low-income geography. Aggregate HMDA data indicates 2.7 percent of home loans were originated to borrowers located in a low-income geography. ANB originated 14.8 percent of home loans to borrowers located in a moderate-income geography. The 2010 Census data indicates 13.9 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data shows 12.8 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

In 2017-2018, ANB originated 11.0 percent of home loans to borrowers located in a low-income geography. The 2015 ACS data indicates 2.5 percent of owner-occupied units are located in a low-income geography. Aggregate HMDA data indicates 3.3 percent of home loans were originated to borrowers located in a low-income geography. ANB originated 17.8 percent of home loans to borrowers located in a moderate-income geography. The 2015 ACS data indicates 16.5 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data shows 17.2 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

Small Loans to Businesses

Refer to Table Q in the State of Minnesota 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 Minneapolis MSA AA is excellent.

In 2016, ANB originated 14.9 percent of small loans to businesses located in a low-income geography. The 2010 Census data indicates 5.1 percent of businesses are located in a low-income geography. Aggregate CRA data indicates 3.9 percent of small loans to businesses in the AA were originated to businesses located in a low-income geography. ANB originated 23.3 percent of small loans to businesses located in a moderate-income geography. The 2010 Census data indicates 15.7 percent of businesses are located in a moderate-income geography. Aggregate CRA data indicates 14.0 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income geography.

In 2017-2018, ANB originated 11.9 percent of small loans to businesses located in a low-income geography. The 2015 ACS data indicates 5.2 percent of small loans to businesses are located in a low-income geography. Aggregate CRA data indicates 4.5 percent of small loans to businesses in the AA were originated to businesses located in a low-income geography. ANB originated 18.2 percent of small loans to businesses located in a moderate-income geography. The 2015 ACS data indicates 17.7 percent of businesses are located in a moderate-income geography. Aggregate CRA data indicates 16.5 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income geography.

Lending Gap Analysis

Data detailing ANB's lending activity during the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms revealed a material number of LMI CTs with no lending activity during the evaluation period. ANB did not originate a home mortgage loan, a small loan to a business, or a small loan to a farm in 75 LMI CTs in the Minneapolis MSA AA during the evaluation period. This represents 34 percent of the total LMI CTs per 2015 ACS data. While material, analysis of

the CTs did not reveal any particular trends or redlining concerns. Management identified loan officer turnover and strong competition as support for the lack of activity in the LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Loans originated in 2016 are compared to 2010 Census data and loans originated in 2017 and 2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Home Mortgage Loans

Refer to Table P in the State of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels in the Minneapolis MSA AA is adequate.

In 2016, ANB originated 16.4 percent of home mortgage loans to low-income borrowers. The 2010 Census data indicates 19.1 percent of families are low-income. Aggregate HMDA data indicates 7.7 percent of loans were made to low-income borrowers. ANB made 16.4 percent of home mortgage loans to moderate-income borrowers. The 2010 Census data indicates 17.2 percent of families are moderate-income. Aggregate HMDA data indicates 19.2 percent of home loans were made to moderate-income borrowers.

In 2017-2018, ANB originated 5.5 percent of home mortgage loans to low-income borrowers. The 2015 ACS data indicates 20.4 of families are low-income. Aggregate HMDA data indicates 9.0 percent of home loans were made to low-income borrowers. ANB originated 8.9 percent of home mortgage loans to moderate-income borrowers. The 2015 ACS data indicates 17.0 percent of families are moderate-income. Aggregate HMDA data indicates 21.5 percent of home loans were to moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the State of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes in the Minneapolis MSA AA is poor.

In 2016, ANB originated 34.1 percent of small business loans to businesses with gross annual revenues of \$1 million or less. The 2010 Census data indicates 83.7 percent of businesses in the AA had revenues of \$1 million or less. Aggregate CRA data indicates 46.6 percent of small business loans were originated to businesses with revenues of \$1 million or less.

By loan size, 51.8 percent of ANB's business loans were \$100 thousand or less. Aggregate CRA data indicates 94.3 percent of business loans originated in the AA were \$100 thousand or less. Twenty-five percent of ANB's business loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 2.6 percent of business loans originated in the AA were

greater than \$100 thousand and less than or equal to \$250 thousand. Twenty-three percent of ANB's business loans were greater than \$250 thousand. Aggregate CRA data indicates 3.1 percent of business loans originated in the AA were greater than \$250 thousand.

In 2017-2018, ANB originated 43.7 percent of small business loans to businesses with revenues of \$1 million or less. The 2015 ACS indicates 84.1 percent of businesses in the AA had revenues of \$1 million or less. Aggregate CRA data indicates 56.0 percent of small business loans were originated to businesses with revenues of \$1 million or less.

By loan size, 51.4 percent of ANB's business loans in 2017-2018 were \$100 thousand or less. Aggregate CRA data indicates 93.0 percent of business loans originated in the AA were \$100 thousand or less. Twenty-three percent of ANB's business loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 3.1 percent of business loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Twenty-six percent of ANB's business loans were greater than \$250 thousand. Aggregate CRA data indicates 3.8 percent of business loans originated in the AA were greater than \$250 thousand.

CD Lending

The institution is a leader in making CD loans. The volume of loans represents excellent responsiveness to the credit needs of the highly economically disadvantaged, low-income individuals, or small farms and businesses in the AA.

The Lending Activity Tables shown above set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Management originated eight CD loans totaling \$23.8 million during the evaluation period. This represents 31.4 percent of allocated tier 1 capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Minneapolis MSA AA. CD loan originations exhibit excellent responsiveness to CD needs within the AA. Four of the CD loans supported community service organizations, three supported affordable housing within in the AA, and one supported economic development. ANB's level of CD lending had a significantly positive impact on the bank's Lending Test rating.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

In addition to the flexible lending programs already discussed, ANB offers flexible home mortgage lending programs through the Minnesota Housing Finance Agency. During the evaluation period, management originated two flexible loans in the Minneapolis MSA AA totaling \$346 thousand.

INVESTMENT TEST

The bank's performance under the Investment Test in Minnesota is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA AA is adequate.

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|------------------------|-----------|
| AA | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Minneapolis MSA | 1 | 823 | 49 | 58 | 50 | 100.0 | 881 | 100.0 | -- | -- |

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

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

ANB's investments and donations demonstrate adequate responsiveness to community needs and opportunities in the Minneapolis MSA AA. Donations and investments total \$881 thousand during the evaluation period. This represents 1.7 percent of allocated tier 1 capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Minneapolis MSA AA.

Management did not purchase any qualified CD bonds during the evaluation period. ANB received credit for one qualified investment totaling \$823 thousand that was purchased in a prior period and is still outstanding. The investment supports affordable housing.

Management provided 49 donations totaling \$58 thousand to 32 qualified CD organizations during the evaluation period. A majority of the donations (46 donations totaling \$55 thousand) support community service agencies. Three of the donations totaling \$3 thousand support affordable housing.

SERVICE TEST

The bank's performance under the Service Test in Minnesota is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA AA is excellent.

Retail Banking Services

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

| Distribution of Branch Delivery System | | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|------|------|------|---------------------------------------|------|------|------|-----|
| AA | 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 | Low | Mod | Mid | Upp | NA |
| Minneapolis MSA | 100.0 | 7 | 100.0 | 14.3 | 28.6 | 42.8 | 14.3 | 6.8 | 20.4 | 42.7 | 29.8 | 0.3 |

ANB's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the Minneapolis MSA AA. There are seven branches in the Minneapolis MSA AA. As of 2018, one branch is located in low-income CTs, two are located in moderate-income CTs, three are located in middle-income CTs, and one is located in upper-income CTs. ANB's branch distribution compares favorably to 2015 ACS data indicating that 6.8 percent of the population lives in low-income CTs and 20.4 percent of the population lives in moderate-income CTs.

ANB does not operate any deposit-taking ATMs in the Minneapolis MSA AA.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|---|-----|-----|-----|
| Branch Openings/Closings | | | | | | |
| AA | # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| Minneapolis MSA | -- | -- | -- | -- | +2 | -- |

Changes in branch locations did not have an adverse effect on the accessibility of ANB's delivery systems. ANB acquired two branches in the Minneapolis MSA AA from Stonebridge Bank on September 30, 2016. Both branches are located in a middle-income CT.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.

Lobby and drive-up hours are similar between all branches in the AA. Each of the bank's branches offer weekday and weekend lobby and drive-up service hours. ANB offers its full range of deposit products at each branch location, with the exception of retail non-deposit investment sales. Initial contact for all loan products, including consumer, home mortgage, commercial, and agricultural, can be made at any branch.

CD Services

The institution provides a relatively high level of CD services.

Employees provide expertise to a variety of organizations that provide community services and affordable housing to LMI individuals. During the evaluation period, 12 employees provided 245 service hours to 27 qualified CD organizations in the Minneapolis MSA AA.

State Rating

State of Nebraska

CRA rating for the State of Nebraska³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in the bank's AA.
- ANB demonstrates good geographic distribution of loans in its AA.
- The institution provided few, if any, CD loans to its AAs. Management did not originate any CD loans in the State of Nebraska during the evaluation period.
- CD investments represent very poor responsiveness to AA needs. Management purchased one bond and made 13 donations in the State of Nebraska during the evaluation period. ANB also received credit for two CD bonds purchased in prior periods. In aggregate, CD investments and grants total \$801 thousand and represent 3.2 percent of allocated tier 1 capital as of December 31, 2018.
- The institution's service delivery systems are accessible to geographies and individuals on different income levels.
- ANB provides an adequate level of CD service hours to its AA. During the evaluation period, 11 employees provided 196 service hours to six CD organizations in the State of Nebraska.

Description of Institution's Operations in Nebraska

For purposes of this examination, ANB operates two AAs in Nebraska. We combined ANB's rural AAs into one AA called the Nebraska Non-MSA AA because the areas are demographically similar and management's business focus is the same amongst the areas. The second AA in Nebraska is the Lincoln MSA AA.

Nebraska Non-MSA AA

The Nebraska Non-MSA AA includes Jefferson, Johnson, Otoe, and Richardson counties in Nebraska. ANB operates six branches and seven cash-dispensing ATMs in the AA. According to 2015 ACS data, the Nebraska Non-MSA AA includes 13 CTs.

As of June 30, 2018, ANB gathered \$156.6 million of deposits in the Nebraska Non-MSA AA. This represents six percent of total bank deposits. ANB ranks first in deposit market share in the Nebraska Non-MSA AA with a total deposit market share of 14.4 percent.

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.

ANB's primary business focus in the Nebraska Non-MSA AA is agricultural and home mortgage loans. During the evaluation period, management originated 375 HMDA and CRA reportable loans totaling \$34.1 million. This represents seven percent of loan originations by number and three percent of loan originations by dollar during the evaluation period. Agricultural loans represent 40 percent of total loan originations within the AA by number and 50 percent of total loan originations by dollar within the AA during the evaluation period. Home mortgage loans represent 45 percent of total loan originations within the AA by number and 36 percent of total loan originations by dollar within the AA during the evaluation period.

Competition in the Nebraska Non-MSA AA is moderate. According to the June 30, 2018 FDIC Deposit Market Share Report, ANB ranked first out of 20 deposit-taking institutions operating in the Nebraska Non-MSA AA. Competition in the Nebraska Non-MSA AA primarily includes local community banks, although some larger regional banks also have a presence in the AA.

We reviewed two community contacts completed in the Nebraska Non-MSA AA within the last six months. The first contact is the Community Program Manager of an organization that supports economic development in the AA. The contact stated that the AA includes many elderly and low-income persons and that the economy follows the agricultural cycle. The contact identified home mortgage loans as the primary credit need. The second contact is the Director of another organization that supports economic development in the AA. The contact noted that low commodity prices are impacting the agricultural economy and that local businesses will likely be impacted from the Spring 2019 flooding in the AA. The contact stated new home construction loans are the primary credit need.

The following tables provide information on the demographic composition of the Nebraska Non-MSA AA.

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (CTs) | 13 | 0.0 | 7.7 | 76.9 | 15.4 | 0.0 |
| Population by Geography | 36,867 | 0.0 | 3.6 | 76.1 | 20.3 | 0.0 |
| Housing Units by Geography | 17,561 | 0.0 | 4.4 | 77.3 | 18.3 | 0.0 |
| Owner-Occupied Units by Geography | 11,748 | 0.0 | 3.1 | 77.7 | 19.2 | 0.0 |
| Occupied Rental Units by Geography | 3,708 | 0.0 | 6.0 | 78.2 | 15.9 | 0.0 |
| Vacant Units by Geography | 2,105 | 0.0 | 9.4 | 73.3 | 17.3 | 0.0 |
| Businesses by Geography | 2,689 | 0.0 | 6.4 | 75.5 | 18.1 | 0.0 |
| Farms by Geography | 711 | 0.0 | 0.6 | 86.6 | 12.8 | 0.0 |
| Family Distribution by Income Level | 9,919 | 17.3 | 18.9 | 24.6 | 39.2 | 0.0 |
| Household Distribution by Income Level | 15,456 | 23.8 | 17.7 | 17.6 | 40.9 | 0.0 |
| Median Family Income Non-MSAs - NE | | \$54,221 | Median Housing Value | | | \$87,973 |
| | | | Median Gross Rent | | | \$528 |
| | | | Families Below Poverty Level | | | 8.1% |

*Source: 2010 U.S. Census and 2016 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 AA | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: Nebraska Non-MSA AA 2017-2018 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 13 | 0.0 | 15.4 | 69.2 | 15.4 | 0.0 |
| Population by Geography | 36,643 | 0.0 | 8.9 | 74.3 | 16.8 | 0.0 |
| Housing Units by Geography | 17,487 | 0.0 | 11.2 | 73.4 | 15.4 | 0.0 |
| Owner-Occupied Units by Geography | 11,479 | 0.0 | 9.0 | 74.2 | 16.8 | 0.0 |
| Occupied Rental Units by Geography | 3,974 | 0.0 | 13.7 | 73.0 | 13.2 | 0.0 |
| Vacant Units by Geography | 2,034 | 0.0 | 18.6 | 70.1 | 11.4 | 0.0 |
| Businesses by Geography | 2,603 | 0.0 | 11.5 | 71.8 | 16.7 | 0.0 |
| Farms by Geography | 594 | 0.0 | 9.1 | 72.6 | 18.4 | 0.0 |
| Family Distribution by Income Level | 9,804 | 19.1 | 18.5 | 25.0 | 37.4 | 0.0 |
| Household Distribution by Income Level | 15,453 | 25.3 | 16.6 | 19.5 | 38.6 | 0.0 |
| Median Family Income Non-MSAs - NE | | \$61,382 | Median Housing Value | | | \$92,166 |
| | | | Median Gross Rent | | | \$567 |
| | | | Families Below Poverty Level | | | 9.1% |

*Source: 2015 ACS Census and 2018 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.*

Lincoln MSA AA

The Lincoln MSA AA includes Lancaster County. ANB operates one branch and four cash-dispensing ATMs in the AA. According to 2015 ACS data, the Lincoln MSA AA includes 74 CTs.

As of June 30, 2018, ANB gathered \$41.7 million of deposits in the Lincoln MSA AA. This represents one percent of total bank deposits. ANB ranks 19th in deposit market share in the Lincoln MSA AA with a total deposit market share of 0.6 percent.

ANB's primary business focus in the Lincoln MSA AA is home mortgage and commercial loans. During the evaluation period, management originated 120 HMDA and CRA reportable loans totaling \$41.3 million in the Lincoln MSA AA. This represents two percent of ANB's total loan originations by number and four percent of total loan originations by dollar during the evaluation period. Home mortgage loans represent 53 percent of total loan originations within the AA by number and 60 percent of total loan originations by dollar within the AA during the evaluation period. Small loans to businesses represent 45 percent of total loan originations within the AA by number and 39 percent of total loan originations by dollar within the AA during the evaluation period.

Competition in the Lincoln MSA AA is significant. According to the June 30, 2018, FDIC Deposit Market Share Report, ANB ranked 19th out of 26 deposit-taking institutions operating in the Lincoln MSA AA. There are a total of 130 deposit-taking branches in the Lincoln MSA AA with ANB operating only one of those branches. Competition in the Lincoln MSA AA includes national and regional banks, as well as local community banks. Banks with larger deposit market share than ANB include Union Bank and Trust Company, Wells Fargo Bank, N.A., and U.S. Bank, N.A.

We completed one community contact in the Lincoln MSA AA. The contact was completed via telephone with the Housing Manager at an organization that provides affordable housing to LMI individuals. The contact stated that the economy in the AA is good and identified affordable housing loans as a primary credit need. We also reviewed one community contact completed in the Lincoln MSA AA within the last year. The contact stated the local economy is strong and diverse, which has resulted in limited housing stock. Primary credit needs include home loans, small business loans, and agricultural loans.

The following tables provide information on the demographic composition of the Lincoln MSA AA.

| Table A – Demographic Information of the AA | | | | | | |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: Lincoln MSA 2016 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 74 | 13.5 | 20.3 | 31.1 | 31.1 | 4.1 |
| Population by Geography | 285,407 | 11.9 | 18.9 | 36.8 | 31.8 | 0.5 |
| Housing Units by Geography | 119,196 | 12.2 | 20.7 | 37.6 | 29.6 | 0.0 |
| Owner-Occupied Units by Geography | 69,500 | 5.0 | 14.0 | 40.6 | 40.4 | 0.0 |
| Occupied Rental Units by Geography | 42,433 | 22.4 | 29.9 | 34.1 | 13.5 | 0.0 |
| Vacant Units by Geography | 7,263 | 21.4 | 30.0 | 29.1 | 19.6 | 0.0 |
| Businesses by Geography | 18,064 | 7.9 | 23.6 | 32.1 | 35.9 | 0.5 |
| Farms by Geography | 791 | 2.1 | 8.1 | 21.9 | 67.9 | 0.0 |
| Family Distribution by Income Level | 69,373 | 19.4 | 18.2 | 23.3 | 39.1 | 0.0 |
| Household Distribution by Income Level | 111,933 | 24.1 | 16.7 | 18.8 | 40.5 | 0.0 |
| Median Family Income MSA - 30700 Lincoln, NE MSA | | \$66,851 | Median Housing Value | | | \$146,648 |
| | | | Median Gross Rent | | | \$668 |
| | | | Families Below Poverty Level | | | 7.7% |

Source: 2010 U.S. Census and 2016 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 AA | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: Lincoln MSA 2017-2018 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 74 | 6.8 | 28.4 | 28.4 | 29.7 | 6.8 |
| Population by Geography | 298,080 | 5.6 | 26.3 | 34.0 | 30.9 | 3.2 |
| Housing Units by Geography | 123,773 | 7.3 | 28.2 | 34.0 | 29.7 | 0.8 |
| Owner-Occupied Units by Geography | 69,852 | 1.6 | 19.5 | 38.5 | 40.2 | 0.2 |
| Occupied Rental Units by Geography | 47,815 | 15.0 | 39.6 | 28.8 | 15.0 | 1.6 |
| Vacant Units by Geography | 6,106 | 13.0 | 38.5 | 23.9 | 23.6 | 1.1 |
| Businesses by Geography | 18,325 | 3.8 | 29.7 | 30.1 | 34.3 | 2.1 |
| Farms by Geography | 740 | 1.6 | 11.9 | 22.8 | 63.5 | 0.1 |
| Family Distribution by Income Level | 70,549 | 21.3 | 17.1 | 21.2 | 40.5 | 0.0 |
| Household Distribution by Income Level | 117,667 | 23.7 | 16.8 | 17.3 | 42.1 | 0.0 |
| Median Family Income MSA - 30700 Lincoln, NE MSA | | \$70,200 | Median Housing Value | | | \$152,644 |
| | | | Median Gross Rent | | | \$726 |
| | | | Families Below Poverty Level | | | 9.3% |
| <i>Source: 2015 ACS Census and 2018 D&B data. Due to rounding, totals may not equal 100.0.</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Scope of Evaluation in Nebraska

We completed full-scope reviews of the Nebraska Non-MSA AA and the Lincoln MSA AA. Refer to the table in Appendix A for additional information.

When determining conclusions, we weighted the bank’s performance in the Nebraska Non-MSA AA most heavily. The AA represents 86 percent of branch locations, 79 percent of deposit volume as of June 30, 2018, and 45 percent of the home mortgage, small business, and small farm loan volume by dollar during the evaluation period.

When determining conclusions for the Lending Test, we weighted loan products to be reflective of ANB’s loan volume by product type during the evaluation period. In the Nebraska Non-MSA AA, loans were weighted consistent with the discussion in the “Ratings” section on page six. In the Lincoln MSA AA, home mortgage loans were weighted most heavily in the Lending Test analysis because they represent 53 percent of total loan originations by number and 60 percent of total loan originations by dollar during the evaluation period. Small loans to businesses represented the remaining weight.

We did not analyze small business loans originated during 2016 in the Nebraska Non-MSA AA or the Lincoln MSA AA because there were fewer than 20 originations. We did not analyze small farm loans in the Lincoln MSA AA during 2016 or 2017-2018 because there were fewer than 20 originations per year. The analysis was omitted because it would not provide meaningful information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nebraska Non-MSA AA is good. Based on a full-scope review, the bank's performance in the Lincoln MSA AA is poor.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

| Number of Loans | | | | | | | |
|------------------|---------------|----------------|------------|----|-------|---------------|------------------|
| AA | Home Mortgage | Small Business | Small Farm | CD | Total | % State Loans | % State Deposits |
| Nebraska Non-MSA | 170 | 54 | 151 | 0 | 375 | 75.8 | 79.0 |
| Lincoln MSA | 64 | 54 | 2 | 0 | 120 | 24.2 | 21.0 |

| Dollar Volume of Loans (in 000s) | | | | | | | |
|----------------------------------|---------------|----------------|------------|----|--------|---------------|------------------|
| AA | Home Mortgage | Small Business | Small Farm | CD | Total | % State Loans | % State Deposits |
| Nebraska Non-MSA | 12,359 | 4,652 | 17,085 | 0 | 34,096 | 45.2 | 79.0 |
| Lincoln MSA | 24,894 | 15,954 | 500 | 0 | 41,348 | 54.8 | 21.0 |

Nebraska Non-MSA AA

Lending levels in the Nebraska Non-MSA AA reflect adequate responsiveness to AA credit needs. During the evaluation period, management originated 170 home loans totaling \$12.4 million, 54 small business loans totaling \$4.7 million, and 151 small farm loans totaling \$17.1 million. Based on the FDIC Market Share report from June 30, 2018, there are 20 deposit-taking institutions with one or more banking offices in the Nebraska Non-MSA AA. ANB ranks first with a deposit market share of 14.4 percent.

ANB's lending market share is adequate compared to its deposit market share in the Nebraska Non-MSA AA. Peer home mortgage data for 2018 indicates ANB ranks seventh among 119 lenders that reported home purchase loans with a market share of 3.9 percent based on the number of loans. This is the equivalent to the top six percent of lenders in the AA. Peer small business loan data for 2018 indicates ANB ranks ninth among 32 lenders that reported small business loans with a market share of 4.5 percent based on the number of loans. This is the equivalent to the top 28 percent of lenders in the AA. Peer small farm loan data for 2018 indicates ANB ranks fourth among 14 lenders that reported small business loans with a market share of 13.5 percent. This is the equivalent to the top 29 percent. Given the competition from other reporting lenders in the AA, the bank's lender rankings are adequate.

Lincoln MSA AA

Lending levels in the Lincoln MSA AA reflect good responsiveness to AA credit needs. During the evaluation period, management originated 64 home loans totaling \$24.9 million, 54 small business loans totaling \$16 million, and two small farm loans totaling \$500 thousand. Based on the FDIC Market Share report from June 30, 2018, there are 26 deposit-taking institutions with one or more banking offices in the Lincoln MSA AA. ANB ranks 19th with a deposit market share of 0.6 percent.

ANB's lending market share is good compared to its deposit market share in the Lincoln MSA AA. Peer home mortgage data for 2018 indicates ANB ranks 72nd among 252 lenders that reported home purchase loans with a market share of 0.1 percent based on the number of loans. This is the equivalent to the top 29 percent of lenders in the AA. Peer small business loan data for 2018 indicates ANB ranks 21st among 73 lenders that reported small business loans with a market share of 0.4 percent based on the number of loans. This is the equivalent to the top 29 percent of lenders in the AA. Given the competition from other reporting lenders in the AA, the bank's lender rankings are good.

We did not analyze small farm loans in the Lincoln MSA AA during the evaluation period because the analysis would not be meaningful. Management originated two small farm loans in the AA during the evaluation period.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

There are no low-income CTs in the Nebraska Non-MSA AA. Loans originated in 2016 are compared to 2010 Census data, and loans originated in 2017 and 2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Home Mortgage Loans

Refer to Table O in the State of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Nebraska Non-MSA AA

The geographic distribution of home mortgage loans to CTs of different income levels in the Nebraska Non-MSA AA is adequate.

In 2016, ANB did not originate any home loans to borrowers located in a moderate-income geography. The 2010 Census data indicates 3.1 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data shows 1.5 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

In 2017-2018, ANB originated 9.4 percent of home loans to borrowers located in a moderate-income geography. The 2015 ACS data indicates 9.0 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data indicates 5.4 percent of home loans were originated to borrowers located in a moderate-income geography.

Lincoln MSA AA

The geographic distribution of home mortgage loans to CTs of different income levels in the Lincoln MSA AA is very poor.

In 2016, ANB did not originate any home loans to borrowers located in a low-income geography. The 2010 Census data indicates 5.0 percent of owner-occupied housing units are located in a low-income geography. Aggregate HMDA data shows 3.6 percent of home mortgage loans were originated to borrowers located in a low-income geography. Management originated 13.3 percent of home loans to borrowers located in a moderate-income geography. The 2010 Census data indicates 14.0 percent of owner-occupied housing units were located in a moderate-income geography. Aggregate HMDA data shows 11.9 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

In 2017-2018, ANB did not originate any home loans to borrowers located in a low-income geography. The 2015 ACS data indicates 1.6 percent of owner-occupied housing units are located in a low-income geography. Aggregate HMDA data shows 2.3 percent of home mortgage loans were originated to borrowers located in a low-income geography. Management originated 11.8 percent of home mortgage loans to borrowers located in a moderate-income geography. The 2015 ACS data indicates 19.5 percent of owner-occupied housing units are located in a moderate-income geography. Aggregate HMDA data shows 18.6 percent of home mortgage loans were made to borrowers located in a moderate-income geography.

Small Loans to Businesses

Refer to Table Q 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.

Nebraska Non-MSA AA

The geographic distribution of small loans to businesses in the Nebraska Non-MSA AA is excellent.

In 2017-2018, ANB originated 16.7 percent of small loans to businesses located in a moderate-income geography. The 2015 ACS data indicates 11.5 percent of businesses are located in a moderate-income geography. Aggregate CRA data indicates 9.6 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income geography.

Lincoln MSA AA

The geographic distribution of small loans to businesses in the Lincoln MSA AA is adequate.

In 2017-2018, ANB did not originate any small loans to businesses in a low-income geography. The 2015 ACS data indicates 3.8 percent of small loans to businesses are located in a low-income geography. Aggregate CRA data indicates 3.4 percent of small loans to businesses in the AA were originated to businesses located in a low-income geography. ANB originated 41.7 percent of small loans to businesses located in a moderate-income geography. The 2015 ACS data indicates 29.7 percent of businesses are located in a moderate-income geography. Aggregate CRA data indicates 26.1 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income geography.

Small Loans to Farms

Refer to Table S 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.

Nebraska Non-MSA AA

The geographic distribution of small loans to farms in the Nebraska Non-MA AA is good.

In 2016, ANB did not originate any small loans to farms located in a moderate-income geography. The 2010 Census data indicates 0.6 percent of farms are located in a moderate-income geography. Aggregate CRA data indicates 0.3 percent of small loans to farms in the AA were originated to farms located in a moderate-income geography.

In 2017-2018, ANB originated 16.5 percent of small loans to farms located in a moderate-income geography. The 2015 ACS data indicates 9.1 percent of farms are located in a moderate-income geography. Aggregate CRA data indicates 9.3 percent of small loans to farms in the AA were originated to farms located in a moderate-income geography.

Lending Gap Analysis

Data detailing ANB's lending activity during the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms did not reveal any conspicuous gaps in the bank's lending activity.

Nebraska Non-MSA AA

ANB originated at least one home mortgage loan, small loan to a business, or small loan to a farm in every CT in the Nebraska Non-MSA AA during the evaluation period.

Lincoln MSA AA

Data detailing ANB's lending activity during the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms revealed a material number of LMI CTs with no lending activity during the evaluation period. ANB did not originate a home mortgage loan, a small loan to a business, or a small loan to a farm in 10 LMI CTs in the Lincoln MSA AA during the evaluation period. This represents 38 percent of the total LMI CTs per 2015 ACS data. While material, analysis of the CTs did not reveal any particular trends or redlining concerns. Management identified loan officer turnover, the heavy presence of college housing in CTs, and strong competition as support for the lack of activity in the LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Loans originated in 2016 are compared to 2010 Census data, and loans originated in 2017 and 2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Home Mortgage Loans

Refer to Table P in the State of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Nebraska Non-MSA AA

The distribution of home mortgage loans to borrowers of different income levels in the Nebraska Non-MSA AA is excellent.

In 2016, ANB originated 14.1 percent of home mortgage loans to low-income borrowers. The 2010 Census data indicates 17.3 percent of families are low-income. Aggregate HMDA data indicates 9.2 percent of loans were made to low-income borrowers. ANB originated 20.0 percent of home mortgage loans to moderate-income borrowers. The 2010 Census data indicates 18.9 percent of families are moderate-income. Aggregate HMDA data indicates 16.4 percent of home loans were made to moderate-income borrowers.

In 2017-2018, ANB originated 14.1 percent of home mortgage loans to low-income borrowers. The 2015 ACS data indicates 19.1 of families are low-income. Aggregate HMDA data indicates 9.4 percent of home loans were made to low-income borrowers. ANB originated 36.5 percent of home mortgage loans to moderate-income borrowers. The 2015 ACS data indicates 18.5 percent of families are moderate-income. Aggregate HMDA data indicates 20.1 percent of home loans were made to moderate-income borrowers.

Lincoln MSA AA

The distribution of home mortgage loans to borrowers of different income levels in the Lincoln MSA AA is adequate.

In 2016, ANB originated 6.7 percent of home mortgage loans to low-income borrowers. The 2010 Census data indicates 19.4 percent of families are low-income. Aggregate HMDA data indicates 6.4 percent of loans were made to low-income borrowers. ANB made 10.0 percent of home mortgage loans to moderate-income borrowers. The 2010 Census data indicates 18.2 percent of families are moderate-income. Aggregate HMDA data indicates 16.3 percent of home loans were made to moderate-income borrowers.

In 2017-2018, ANB originated 8.8 percent of home mortgage loans to low-income borrowers. The 2015 ACS data indicates 21.3 percent of families are low-income. Aggregate HMDA data indicates 8.9 percent of home loans were made to low-income borrowers. ANB originated 14.7 percent of home mortgage loans to moderate-income borrowers. The 2015 ACS data indicates 17.1 percent of families are moderate-income. Aggregate HMDA data indicates 19.8 percent of home loans were to moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the State of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Nebraska Non-MSA AA

The distribution of small loans to businesses of different sizes in the Nebraska Non-MSA AA is excellent.

In 2017-2018, ANB originated 72.2 percent of small business loans to businesses with revenues of \$1 million or less. The 2015 ACS indicates 76.3 percent of businesses in the AA had revenues of \$1 million or less. Aggregate CRA data indicates 51.1 percent of small business loans were originated to businesses with revenues of \$1 million or less.

By loan size, 83.3 percent of ANB's business loans in 2017-2018 were \$100 thousand or less. Aggregate CRA data indicates 92.9 percent of business loans originated in the AA were \$100 thousand or less. Eight percent of ANB's business loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 3.8 percent of business loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Eight percent of ANB's business loans were greater than \$250 thousand. Aggregate CRA data indicates 3.3 percent of business loans originated in the AA were greater than \$250 thousand.

Lincoln MSA AA

The distribution of small loans to businesses of different sizes in the Lincoln MSA AA is very poor.

In 2017-2018, ANB originated 27.8 percent of small business loans to businesses with revenues of \$1 million or less. The 2015 ACS indicates 79.9 percent of businesses in the AA had revenues of \$1 million or less. Aggregate CRA data indicates 51.5 percent of small business loans were originated to businesses with revenues of \$1 million or less.

By loan size, 22.2 percent of ANB's business loans in 2017-2018 were \$100 thousand or less. Aggregate CRA data indicates 87.9 percent of business loans originated in the AA were \$100 thousand or less. Twenty-five percent of ANB's business loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 6.3 percent of business loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Fifty-three percent of ANB's business loans were greater than \$250 thousand. Aggregate CRA data indicates 5.9 percent of business loans originated in the AA were greater than \$250 thousand.

Small Loans to Farms

Refer to Table T in the State of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Nebraska Non-MSA AA

The distribution of small loans to farms of different sizes in the Nebraska Non-MSA AA is excellent.

In 2016, ANB originated 83.3 percent of small farm loans to farms with gross annual revenues of \$1 million or less. The 2010 Census data indicates 98.3 percent of AA farms had revenues of \$1 million or less. Aggregate CRA data indicates 61.9 percent of small farm loans were made to farms with revenues of \$1 million or less.

By loan size, 68.1 percent of ANB's farm loans were \$100 thousand or less. Aggregate CRA data indicates 72.6 percent of farm loans originated in the AA were \$100 thousand or less. Fifteen percent of ANB's farm loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 13.0 percent of farm loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Seventeen percent of ANB's farm loans were greater than \$250 thousand. Aggregate CRA data indicates 14.3 percent of farm loans originated in the AA were greater than \$250 thousand.

In 2017-2018, ANB originated 89.9 percent of small farm loans to farms with gross annual revenues of \$1 million or less. 2015 ACS data indicates 97.6 percent of AA farms had revenues of \$1 million or less. Aggregate CRA data indicates 57.6 percent of small farm loans were made to farms with revenues of \$1 million or less.

By loan size, 67.1 percent of ANB's farm loans in 2017-2018 were \$100 thousand or less. Aggregate CRA data indicates 74.6 percent of farm loans originated in the AA were \$100 thousand or less. Twenty percent of ANB's farm loans were greater than \$100 thousand and less than or equal to \$250 thousand. Aggregate CRA data indicates 14.8 percent of farm loans originated in the AA were greater than \$100 thousand and less than or equal to \$250 thousand. Thirteen percent of ANB's farm loans were greater than \$250 thousand. Aggregate CRA data indicates 10.6 percent of farm loans originated in the AA were greater than \$250 thousand.

CD Lending

The institution has made few, if any, CD loans. The volume of loans represents very poor responsiveness to the credit needs of the highly economically disadvantaged, low-income individuals, or small farms and businesses in the AAs.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Nebraska Non-MSA AA

Management did not originate any CD loans in the Nebraska Non-MSA AA during the evaluation period.

Lincoln MSA AA

Management did not originate any CD loans in the Lincoln MSA AA during the evaluation period.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

In addition to the flexible lending programs already discussed, ANB offers flexible home mortgage lending programs including the Nebraska Investment Finance Authority and Nebraska Dollar and Energy Saving loan programs.

Nebraska Non-MSA AA

During the evaluation period, management originated seven flexible loans in the Nebraska Non-MSA AA totaling \$251 thousand.

Lincoln MSA AA

Flexible loans originated in the Lincoln MSA AA during the evaluation were included in the “Overall CRA Rating” section on page 3.

INVESTMENT TEST

The bank’s performance under the Investment Test in Nebraska is rated Needs to Improve.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in the Nebraska Non-MSA AA is very poor. Based on a full-scope review, the bank’s performance in the Lincoln MSA AA is excellent.

The institution has a poor level of qualified CD investments and grants, particularly those that are not provided by private investors.

The institution exhibits very poor responsiveness to credit and community economic development needs. The institution makes rare use of innovative and/or complex investments to support CD initiatives.

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|------------------------|-----------|
| AA | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Nebraska Non-MSA | -- | -- | 6 | 2 | 6 | 30.0 | 2 | 0.1 | -- | -- |
| Lincoln MSA | 2 | 417 | 8 | 382 | 10 | 50.0 | 799 | 99.8 | -- | -- |
| Statewide | -- | -- | 4 | 2 | 4 | 20.0 | 2 | 0.1 | -- | -- |

* 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.

Nebraska Non-MSA AA

ANB's investments and donations demonstrate very poor responsiveness to community needs and opportunities in the Nebraska Non- MSA AA. Donations and investments total \$2 thousand during the evaluation period. This represents 0.01 percent of allocated tier 1 capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Nebraska Non-MSA AA.

Management did not purchase any qualified CD bonds during the evaluation period. Additionally, ANB did not receive credit for any qualified investments purchased in prior periods and still outstanding.

Management provided six donations totaling \$2 thousand to five qualified CD organizations during the evaluation period. Five of the donations supported community service organizations and one provided funding to revitalize/stabilize a distressed/underserved middle-income CT.

Lincoln MSA AA

ANB's investments and donations demonstrate good responsiveness to community needs and opportunities in the Lincoln MSA AA. Donations and investments total \$799 thousand during the evaluation period. This represents 15.5 percent of allocated tier 1 capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Lincoln MSA AA.

Management purchased one qualified CD bond during the evaluation period. The bond totaled \$370 thousand and supported affordable housing in the AA. Additionally, management received credit for two qualified investments purchased in prior periods and still outstanding. The bonds totaled \$417 thousand and also supported affordable housing.

Management provided seven donations totaling \$12 thousand to five qualified CD organizations during the evaluation period. Five of the donations totaling \$8 thousand supported community service organizations. The remaining donations supported affordable housing in the AA.

Statewide

Management provided four donations totaling \$2 thousand to two organizations that benefit the State of Nebraska during the evaluation period. The donations provided support to community service organizations.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Nebraska Non-MSA AA is excellent. Based on a full-scope review, the bank's performance in the Lincoln MSA AA is poor.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.

| Distribution of Branch Delivery System | | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|-----|-----|-----|---------------------------------------|------|------|------|-----|
| AA | 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 | Low | Mod | Mid | Upp | NA |
| Nebraska Non-MSA | 79.0 | 6 | 85.7 | -- | 2 | 4 | -- | -- | 8.9 | 74.3 | 16.8 | -- |
| Lincoln MSA | 21.0 | 1 | 14.3 | -- | -- | 1 | -- | 5.6 | 26.3 | 34.0 | 30.9 | 3.2 |

Nebraska Non-MSA AA

ANB's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the Nebraska Non-MSA AA. There are six branches in the Nebraska Non-MSA AA. As of 2018, two branches are located in moderate-income CTs and four are located in middle-income CTs. ANB's branch distribution compares favorably to 2015 ACS data indicating that 8.9 percent of the population lives in moderate-income CTs.

ANB does not operate any deposit-taking ATMs in the Nebraska Non-MSA AA.

Lincoln MSA AA

ANB's service delivery systems are unreasonably inaccessible to portions of its AA, particularly LMI geographies and individuals. ANB operates one branch in the Lincoln MSA AA. The branch is located in a middle-income CT. ANB's branch distribution compares unfavorably to 2015 ACS data indicating 5.6 percent of the population lives in low-income CTs and 26.3 percent of the population lives in moderate-income CTs.

ANB does not operate any deposit-taking ATMs in the Lincoln MSA AA.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|---|-----|-----|-----|
| Branch Openings/Closings | | | | | | |
| AA | # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| Nebraska Non-MSA | -- | -- | -- | -- | -- | -- |
| Lincoln MSA | -- | -- | -- | -- | -- | -- |

ANB did not open or close any branches in the Nebraska Non-MSA AA or the Lincoln MSA AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.

Nebraska Non-MSA AA

Lobby hours are similar between all branches in the AA with the exception of the Elk Creek and Tecumseh branches. Both of the branches have reduced hours due to limited foot traffic; however, each are located in a middle-income CT. Drive-up service hours are similar between all branches with the exception of the Elk Creek and Humboldt branches. These branches do not offer drive-up service hours. The Humboldt branch is located in a moderate-income CT. Management offers lobby hours Monday through Saturday to accommodate Humboldt customers. ANB offers its full range of deposit products at each branch location, with the exception of retail non-deposit investment sales. Initial contact for all loan products, including consumer, home mortgage, commercial, and agricultural, can be made at any branch.

Lincoln MSA AA

ANB operates one branch in the Lincoln MSA AA. The branch is located in a middle-income CT.

CD Services

The institution provides an adequate level of CD services.

Nebraska Non-MSA AA

Management provides an adequate level of CD services in the Nebraska Non-MSA AA. During the evaluation period, two employees provided 58 service hours to two qualified CD organizations in the Nebraska Non-MSA AA.

Lincoln MSA AA

Management provides an adequate level of CD services in the Lincoln MSA AA. During the evaluation period, three employees provided 76 service hours to three qualified CD organizations in the Lincoln MSA AA. Two of the employees supported the same organizations for multiple years during the evaluation period.

Statewide

Six employees provided 62 service hours to one qualified CD organization that benefits the State of Nebraska during the evaluation period. The organization provides community services to the state.

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: | 1/1/2016 to 12/31/2018 | |
| Bank Products Reviewed: | Home mortgage, small business, small farm loans CD loans, qualified investments, CD services | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| American National Community Development Corporation (ANCDC) | Holding company subsidiary | CD loans, qualified investments, CD services |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| MMSA(s) | | |
| Omaha-Council Bluffs NE-IA MMSA | Full-scope | Douglas and Sarpy counties in Nebraska, Harrison and Pottawattamie counties in Iowa |
| | | |
| State of Minnesota | | |
| Minneapolis-St. Paul-Bloomington MN-WI MMSA | Full-scope | Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties in Minnesota |
| | | |
| State of Nebraska | | |
| Nebraska Non-MSA | Full-scope | Jefferson, Johnson, Otoe, and Richardson counties in Nebraska |
| Lincoln MSA | Full-scope | Lancaster County in Nebraska |

Appendix B: Summary of MMSA and State Ratings

| RATINGS AMERICAN NATIONAL BANK | | | | |
|---------------------------------|----------------------|------------------------|---------------------|--------------------------------------|
| Overall Bank: | Lending Test Rating* | Investment Test Rating | Service Test Rating | Overall Bank/State/Multistate Rating |
| American National Bank | Outstanding | Low Satisfactory | High Satisfactory | Satisfactory |
| MMSA or State: | | | | |
| Omaha-Council Bluffs NE-IA MMSA | Outstanding | Low Satisfactory | High Satisfactory | Satisfactory |
| Minnesota | Outstanding | Low Satisfactory | Outstanding | Outstanding |
| Nebraska | High Satisfactory | Needs to Improve | High Satisfactory | Satisfactory |

(*) The Lending Test is 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 (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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. CTs 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 LMI individuals; community services targeted to LMI 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 LMI 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 CT 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 an MSA 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: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A CT with a median family income that is less than 50 percent.

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

MMSA (state): Any MMSA 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 CD.

Rating Area: A rated area is a state or MMSA. 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 MMSA, the institution will receive a rating for the MMSA.

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 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 MSAs, 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless

of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Omaha-Council Bluffs NE-IA Multistate MSA

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2016 |
|--|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| AA: | 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 |
| Omaha MMSA | 1,106 | 174,188 | 100.0 | 36,425 | 5.8 | 3.3 | 3.1 | 17.8 | 18.4 | 12.8 | 43.4 | 44.8 | 40.7 | 33.0 | 33.5 | 43.4 | 0.0 | 0.0 | 0.0 |
| Total | 1,106 | 174,188 | 100.0 | 36,425 | 5.8 | 3.3 | 3.1 | 17.8 | 18.4 | 12.8 | 43.4 | 44.8 | 40.7 | 33.0 | 33.5 | 43.4 | 0.0 | 0.0 | 0.0 |

Source: 2010 U.S Census, 1/1/2016 - 12/31/2016 bank data, 2016 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2017-18 |
|--|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| AA: | 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 |
| Omaha MMSA | 1,317 | 246,776 | 100.0 | 30,495 | 5.1 | 3.3 | 3.9 | 19.7 | 25.1 | 17.1 | 41.4 | 43.4 | 38.7 | 33.8 | 28.3 | 40.2 | 0.0 | 0.0 | 0.0 |
| Total | 1,317 | 246,776 | 100.0 | 30,495 | 5.1 | 3.3 | 3.9 | 19.7 | 25.1 | 17.1 | 41.4 | 43.4 | 38.7 | 33.8 | 28.3 | 40.2 | 0.0 | 0.0 | 0.0 |

Source: 2015 ACS Census, 1/1/2017 - 12/31/2018 bank data, 2018 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2016 | | |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|--|--|
| AA: | 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 | | |
| Omaha MMSA | 1,106 | 174,188 | 100.0 | 36,425 | 21.0 | 11.8 | 7.0 | 17.4 | 25.0 | 16.3 | 22.5 | 21.7 | 20.5 | 39.1 | 36.3 | 37.3 | 0.0 | 5.2 | 18.9 | | |
| Total | 1,106 | 174,188 | 100.0 | 36,425 | 21.0 | 11.8 | 7.0 | 17.4 | 25.0 | 16.3 | 22.5 | 21.7 | 20.5 | 39.1 | 36.3 | 37.3 | 0.0 | 5.2 | 18.9 | | |

*Source: 2010 U.S. Census, 1/1/2016 - 12/31/2016 bank data, 2016 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2017-18 | | |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|--|
| AA: | 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 | | |
| Omaha MMSA | 1,317 | 246,776 | 100.0 | 30,495 | 21.0 | 15.9 | 8.8 | 17.9 | 26.3 | 20.7 | 21.2 | 21.4 | 21.2 | 40.0 | 33.3 | 32.3 | 0.0 | 3.1 | 16.9 | | |
| Total | 1,317 | 246,776 | 100.0 | 30,495 | 21.0 | 15.9 | 8.8 | 17.9 | 26.3 | 20.7 | 21.2 | 21.4 | 21.2 | 40.0 | 33.3 | 32.3 | 0.0 | 3.1 | 16.9 | | |

*Source: 2015 ACS Census, 1/1/2017 - 12/31/2018 bank data, 2018 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2016 |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|-------------|
| AA: | 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 | |
| Omaha MMSA | 404 | 92,233 | 100.0 | 15,524 | 7.2 | 12.1 | 5.8 | 18.0 | 15.1 | 14.6 | 43.4 | 44.6 | 41.4 | 31.0 | 28.2 | 38.1 | 0.5 | 0.0 | 0.1 | |
| Total | 404 | 92,233 | 100.0 | 15,524 | 7.2 | 12.1 | 5.8 | 18.0 | 15.1 | 14.6 | 43.4 | 44.6 | 41.4 | 31.0 | 28.2 | 38.1 | 0.5 | 0.0 | 0.1 | |

Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2017-18 |
|---|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|----------------|
| AA: | 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 | |
| Omaha MMSA | 682 | 143,671 | 100.0 | 13,570 | 6.9 | 10.6 | 6.1 | 17.0 | 15.8 | 14.7 | 46.0 | 42.5 | 44.6 | 30.1 | 31.1 | 34.5 | 0.0 | 0.0 | 0.0 | |
| Total | 682 | 143,671 | 100.0 | 13,570 | 6.9 | 10.6 | 6.1 | 17.0 | 15.8 | 14.7 | 46.0 | 42.5 | 44.6 | 30.1 | 31.1 | 34.5 | 0.0 | 0.0 | 0.0 | |

Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2016 | |
|---|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|
| AA: | 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 | |
| Omaha MMSA | 404 | 92,233 | 100.0 | 15,524 | 79.8 | 52.5 | 41.3 | 7.4 | 45.5 | 12.8 | 2.0 | |
| Total | 404 | 92,233 | 100.0 | 15,524 | 79.8 | 52.5 | 41.3 | 7.4 | 45.5 | 12.8 | 2.0 | |

Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2017-18 | |
|---|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|
| AA: | 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 | |
| Omaha MMSA | 682 | 143,671 | 100.0 | 13,570 | 79.9 | 47.4 | 48.0 | 7.4 | 51.5 | 12.7 | 1.2 | |
| Total | 682 | 143,671 | 100.0 | 13,570 | 79.9 | 47.4 | 48.0 | 7.4 | 51.5 | 12.7 | 1.2 | |

Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2016 |
|---|----------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|-------------|
| AA: | 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 | |
| Omaha MMSA | 185 | 25,494 | 100.0 | 638 | 1.9 | 0.0 | 0.6 | 7.8 | 0.0 | 2.0 | 64.2 | 88.6 | 80.9 | 26.1 | 11.4 | 16.3 | 0.0 | 0.0 | 0.2 | |
| Total | 185 | 25,494 | 100.0 | 638 | 1.9 | 0.0 | 0.6 | 7.8 | 0.0 | 2.0 | 64.2 | 88.6 | 80.9 | 26.1 | 11.4 | 16.3 | 0.0 | 0.0 | 0.2 | |

*Source: 2016 D&B data; 1/1/2016 - 12/31/2016 bank data; 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2017-18 |
|---|----------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|----------------|
| AA: | 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 | |
| Omaha MMSA | 276 | 44,291 | 100.0 | 647 | 2.4 | 0.0 | 0.3 | 11.2 | 1.4 | 12.1 | 53.8 | 74.6 | 63.8 | 32.7 | 23.9 | 23.8 | 0.0 | 0.0 | 0.0 | |
| Total | 276 | 44,291 | 100.0 | 647 | 2.4 | 0.0 | 0.3 | 11.2 | 1.4 | 12.1 | 53.8 | 74.6 | 63.8 | 32.7 | 23.9 | 23.8 | 0.0 | 0.0 | 0.0 | |

*Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2016 |
|---|----------------------|---------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|
| AA: | 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 |
| Omaha MMSA | 185 | 25,494 | 100.0 | 638 | 96.8 | 94.1 | 67.4 | 2.0 | 4.9 | 1.2 | 1.1 |
| Total | 185 | 25,494 | 100.0 | 638 | 96.8 | 94.1 | 67.4 | 2.0 | 4.9 | 1.2 | 1.1 |

*Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2017-18 |
|---|----------------------|---------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|----------------|
| AA: | 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 |
| Omaha MMSA | 276 | 44,291 | 100.0 | 647 | 96.4 | 93.8 | 64.1 | 2.2 | 5.8 | 1.4 | 0.6 |
| Total | 276 | 44,291 | 100.0 | 647 | 96.4 | 93.8 | 64.1 | 2.2 | 5.8 | 1.4 | 0.6 |

*Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

State of Minnesota

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2016 |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|
| AA: | 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 |
| Minneapolis MSA | 61 | 72,244 | 100.0 | 144,046 | 2.9 | 4.9 | 2.7 | 13.9 | 14.8 | 12.8 | 46.2 | 49.2 | 45.5 | 37.0 | 31.1 | 38.9 | 0.0 | 0.0 | 0.0 |
| Total | 61 | 72,244 | 100.0 | 144,046 | 2.9 | 4.9 | 2.7 | 13.9 | 14.8 | 12.8 | 46.2 | 49.2 | 45.5 | 37.0 | 31.1 | 38.9 | 0.0 | 0.0 | 0.0 |

*Source: 2010 U.S. Census, 1/1/2016 - 12/31/2016 bank data, 2016 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2017-18 |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|
| AA: | 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 |
| Minneapolis MSA | 236 | 92,007 | 100.0 | 120,628 | 2.5 | 11.0 | 3.3 | 16.5 | 17.8 | 17.2 | 46.3 | 37.7 | 46.0 | 34.6 | 33.1 | 33.4 | 0.1 | 0.4 | 0.1 |
| Total | 236 | 92,007 | 100.0 | 120,628 | 2.5 | 11.0 | 3.3 | 16.5 | 17.8 | 17.2 | 46.3 | 37.7 | 46.0 | 34.6 | 33.1 | 33.4 | 0.1 | 0.4 | 0.1 |

*Source: 2015 ACS Census, 1/1/2017 - 12/31/2018 bank data, 2018 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2016 | | |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|--|--|
| AA: | 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 | | |
| Minneapolis MSA | 61 | 72,244 | 100.0 | 144,046 | 19.1 | 16.4 | 7.7 | 17.2 | 16.4 | 19.2 | 22.6 | 26.2 | 21.4 | 41.1 | 19.7 | 34.2 | 0.0 | 21.3 | 17.5 | | |
| Total | 61 | 72,244 | 100.0 | 144,046 | 19.1 | 16.4 | 7.7 | 17.2 | 16.4 | 19.2 | 22.6 | 26.2 | 21.4 | 41.1 | 19.7 | 34.2 | 0.0 | 21.3 | 17.5 | | |

*Source: 2010 U.S. Census, 1/1/2016 - 12/31/2016 bank data, 2016 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2017-18 | | |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|--|
| AA: | 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 | | |
| Minneapolis MSA | 236 | 92,007 | 100.0 | 120,628 | 20.4 | 5.5 | 9.0 | 17.0 | 8.9 | 21.5 | 21.7 | 8.9 | 21.9 | 41.0 | 41.9 | 30.4 | 0.0 | 34.7 | 17.2 | | |
| Total | 236 | 92,007 | 100.0 | 120,628 | 20.4 | 5.5 | 9.0 | 17.0 | 8.9 | 21.5 | 21.7 | 8.9 | 21.9 | 41.0 | 41.9 | 30.4 | 0.0 | 34.7 | 17.2 | | |

*Source: 2015 ACS Census, 1/1/2017 - 12/31/2018 bank data, 2018 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2016 | |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|-------------|--|
| AA: | 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 | |
| Minneapolis MSA | 249 | 48,912 | 100.0 | 71,123 | 5.1 | 14.9 | 3.9 | 15.7 | 23.3 | 14.0 | 42.1 | 41.8 | 40.2 | 37.0 | 20.1 | 41.8 | 0.0 | 0.0 | 0.0 | |
| Total | 249 | 48,912 | 100.0 | 71,123 | 5.1 | 14.9 | 3.9 | 15.7 | 23.3 | 14.0 | 42.1 | 41.8 | 40.2 | 37.0 | 20.1 | 41.8 | 0.0 | 0.0 | 0.0 | |

*Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2017-18 | |
|---|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| AA: | 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 | |
| Minneapolis MSA | 588 | 122,579 | 100.0 | 60,540 | 5.2 | 11.9 | 4.5 | 17.7 | 18.2 | 16.5 | 44.6 | 41.0 | 44.3 | 32.2 | 28.4 | 34.5 | 0.4 | 0.5 | 0.2 | |
| Total | 588 | 122,579 | 100.0 | 60,540 | 5.2 | 11.9 | 4.5 | 17.7 | 18.2 | 16.5 | 44.6 | 41.0 | 44.3 | 32.2 | 28.4 | 34.5 | 0.4 | 0.5 | 0.2 | |

*Source: 2018 D&B data; 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2016 | |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|
| AA: | 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 | |
| Minneapolis MSA | 249 | 48,912 | 100.0 | 71,123 | 83.7 | 34.1 | 46.6 | 7.1 | 60.2 | 9.2 | 5.6 | |
| Total | 249 | 48,912 | 100.0 | 71,123 | 83.7 | 34.1 | 46.6 | 7.1 | 60.2 | 9.2 | 5.6 | |

*Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2017-18 | |
|--|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|----------------|--|
| AA: | 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 | |
| Minneapolis MSA | 588 | 122,579 | 100.0 | 60,540 | 84.1 | 43.7 | 56.0 | 6.8 | 52.4 | 9.1 | 3.9 | |
| Total | 588 | 122,579 | 100.0 | 60,540 | 84.1 | 43.7 | 56.0 | 6.8 | 52.4 | 9.1 | 3.9 | |

*Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

State of Nebraska

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2016 |
|--|---------------------------|--------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| AA: | 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 |
| Lincoln MSA | 30 | 3,232 | 26.1 | 13,078 | 5.0 | 0.0 | 3.6 | 14.0 | 13.3 | 11.9 | 40.6 | 60.0 | 38.1 | 40.4 | 26.7 | 46.4 | 0.0 | 0.0 | 0.0 |
| Nebraska Non-MSA | 85 | 6,379 | 73.9 | 927 | 0.0 | 0.0 | 0.0 | 3.1 | 0.0 | 1.5 | 77.7 | 76.5 | 70.8 | 19.2 | 23.5 | 27.7 | 0.0 | 0.0 | 0.0 |
| Total | 115 | 9,611 | 100.0 | 14,005 | 4.2 | 0.0 | 3.4 | 12.4 | 3.5 | 11.2 | 46.0 | 72.2 | 40.2 | 37.4 | 24.3 | 45.2 | 0.0 | 0.0 | 0.0 |

Source: 2010 U.S. Census, 1/1/2016 - 12/31/2016 bank data, 2016 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2017-18 |
|--|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| 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 |
| Lincoln MSA | 34 | 21,662 | 28.6 | 11,330 | 1.6 | 0.0 | 2.3 | 19.5 | 11.8 | 18.6 | 38.5 | 32.4 | 37.3 | 40.2 | 55.9 | 41.6 | 0.2 | 0.0 | 0.2 |
| Nebraska Non-MSA | 85 | 5,980 | 71.4 | 801 | 0.0 | 0.0 | 0.0 | 9.0 | 9.4 | 5.4 | 74.2 | 88.2 | 68.0 | 16.8 | 2.4 | 26.6 | 0.0 | 0.0 | 0.0 |
| Total | 119 | 27,642 | 100.0 | 12,131 | 1.4 | 0.0 | 2.1 | 18.0 | 10.1 | 17.7 | 43.5 | 72.3 | 39.3 | 36.9 | 17.6 | 40.6 | 0.1 | 0.0 | 0.2 |

Source: 2015 ACS Census, 1/1/2017 - 12/31/2018 bank data, 2018 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2016 | |
|--|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|--|
| AA: | 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 | |
| Lincoln MSA | 30 | 3,232 | 26.1 | 13,078 | 19.4 | 6.7 | 6.4 | 18.2 | 10.0 | 16.3 | 23.3 | 30.0 | 19.8 | 39.1 | 43.3 | 33.6 | 0.0 | 10.0 | 23.9 | |
| Nebraska Non-MSA | 85 | 6,379 | 73.9 | 927 | 17.3 | 14.1 | 9.2 | 18.9 | 20.0 | 16.4 | 24.6 | 32.9 | 23.7 | 39.2 | 29.4 | 35.2 | 0.0 | 3.5 | 15.5 | |
| Total | 115 | 9,611 | 100.0 | 14,005 | 19.1 | 12.2 | 6.6 | 18.3 | 17.4 | 16.3 | 23.5 | 32.2 | 20.1 | 39.1 | 33.0 | 33.7 | 0.0 | 5.2 | 23.4 | |

Source: 2010 U.S. Census, 1/1/2016 - 12/31/2016 bank data, 2016 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2017-18 | |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| AA: | 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 | |
| Lincoln MSA | 34 | 21,662 | 45.9 | 11,330 | 21.3 | 8.8 | 8.9 | 17.1 | 14.7 | 19.8 | 21.2 | 20.6 | 21.7 | 40.5 | 52.9 | 30.7 | 0.0 | 2.9 | 18.9 | |
| Nebraska Non-MSA | 85 | 5,980 | 71.4 | 801 | 19.1 | 14.1 | 9.4 | 18.5 | 36.5 | 20.1 | 25.0 | 25.9 | 22.1 | 37.4 | 21.2 | 32.0 | 0.0 | 2.4 | 16.5 | |
| Total | 119 | 27,642 | 100.0 | 12,131 | 21.0 | 12.6 | 8.9 | 17.2 | 30.3 | 19.9 | 21.6 | 24.4 | 21.8 | 40.1 | 30.3 | 30.8 | 0.0 | 2.5 | 18.7 | |

Source: 2015 ACS Census, 1/1/2017 - 12/31/2018 bank data, 2018 HMDA aggregate data.
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

| AA: | 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 |
| Lincoln MSA | 18 | 4,372 | 50.0 | 4,771 | 7.9 | 11.1 | 6.2 | 23.6 | 0.0 | 21.1 | 32.1 | 55.6 | 31.4 | 35.9 | 33.3 | 41.1 | 0.5 | 0.0 | 0.2 |
| Nebraska Non-MSA | 18 | 1,307 | 50.0 | 457 | 0.0 | 0.0 | 0.0 | 6.4 | 11.1 | 6.3 | 75.5 | 72.2 | 70.9 | 18.1 | 16.7 | 22.8 | 0.0 | 0.0 | 0.0 |
| Total | 36 | 5,679 | 100.0 | 5,228 | 6.9 | 5.6 | 5.7 | 21.4 | 5.6 | 19.8 | 37.7 | 63.9 | 34.9 | 33.6 | 25.0 | 39.5 | 0.4 | 0.0 | 0.2 |

Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
 Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

| AA: | 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 |
| Lincoln MSA | 36 | 11,582 | 50.0 | 4,775 | 3.8 | 0.0 | 3.4 | 29.7 | 41.7 | 26.1 | 30.1 | 44.4 | 29.2 | 34.3 | 13.9 | 40.0 | 2.1 | 0.0 | 1.4 |
| Nebraska Non-MSA | 36 | 3,345 | 92.3 | 397 | 0.0 | 0.0 | 0.0 | 11.5 | 16.7 | 9.6 | 71.8 | 80.6 | 72.0 | 16.7 | 2.8 | 18.4 | 0.0 | 0.0 | 0.0 |
| Total | 72 | 14,927 | 100.0 | 5,172 | 3.3 | 0.0 | 3.2 | 27.4 | 29.2 | 24.8 | 35.3 | 62.5 | 32.4 | 32.1 | 8.3 | 38.3 | 1.8 | 0.0 | 1.3 |

Source: 2018 D&B Data; 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
 Due to rounding, totals may not equal 100.0.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2016 |
|---|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| AA: | 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 |
| Lincoln MSA | 18 | 4,372 | 50.0 | 4,771 | 80.6 | 22.2 | 46.6 | 6.8 | 77.8 | 12.6 | 0.0 |
| Nebraska Non-MSA | 18 | 1,307 | 50.0 | 457 | 77.3 | 66.7 | 49.0 | 5.2 | 27.8 | 17.5 | 5.6 |
| Total | 36 | 5,679 | 100.0 | 5,228 | 80.1 | 44.4 | 46.8 | 6.6 | 52.8 | 13.3 | 2.8 |

Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2017-18 |
|---|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| AA: | 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 |
| Lincoln MSA | 36 | 11,582 | 50.0 | 4,775 | 79.9 | 27.8 | 51.5 | 6.9 | 72.2 | 13.2 | 0.0 |
| Nebraska Non-MSA | 36 | 3,345 | 50.0 | 397 | 76.3 | 72.2 | 51.1 | 5.2 | 27.8 | 18.6 | 0.0 |
| Total | 72 | 14,927 | 100.0 | 5,172 | 79.5 | 50.0 | 51.5 | 6.6 | 50.0 | 13.9 | 0.0 |

Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2016 |
|---|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|-------------|
| AA: | 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 | |
| Lincoln MSA | 0 | 0 | 0.0 | 239 | 2.1 | 0.0 | 2.1 | 8.1 | 0.0 | 6.3 | 21.9 | 0.0 | 10.9 | 67.9 | 0.0 | 80.8 | 0.0 | 0.0 | 0.0 | |
| Nebraska Non-MSA | 72 | 8,451 | 100.0 | 307 | 0.0 | 0.0 | 0.0 | 0.6 | 0.0 | 0.3 | 86.6 | 93.1 | 91.5 | 12.8 | 6.9 | 8.1 | 0.0 | 0.0 | 0.0 | |
| Total | 72 | 8,451 | 100.0 | 546 | 1.1 | 0.0 | 0.9 | 4.5 | 0.0 | 2.9 | 52.5 | 93.1 | 56.2 | 41.8 | 6.9 | 39.9 | 0.0 | 0.0 | 0.0 | |

*Source: 2016 D&B data, 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2017-18 |
|---|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|----------------|
| 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 | |
| Lincoln MSA | 2 | 500 | 2.5 | 257 | 1.6 | 0.0 | 0.0 | 11.9 | 0.0 | 3.5 | 22.8 | 0.0 | 8.9 | 63.5 | 100.0 | 87.5 | 0.1 | 0.0 | 0.0 | |
| Nebraska Non-MSA | 79 | 8,634 | 97.5 | 311 | 0.0 | 0.0 | 0.0 | 9.1 | 16.5 | 9.3 | 72.6 | 79.7 | 77.5 | 18.4 | 3.8 | 13.2 | 0.0 | 0.0 | 0.0 | |
| Total | 81 | 9,134 | 100.0 | 568 | 0.9 | 0.0 | 0.0 | 10.6 | 16.0 | 6.7 | 45.0 | 77.8 | 46.5 | 43.4 | 6.2 | 46.8 | 0.1 | 0.0 | 0.0 | |

*Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.*

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2016 |
|--|----------------------|--------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|
| AA: | 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 |
| Lincoln MSA | 0 | 0 | 0.0 | 239 | 98.1 | 0.0 | 75.3 | 1.4 | 0.0 | 0.5 | 0.0 |
| Nebraska Non-MSA | 72 | 8,451 | 100.0 | 307 | 98.3 | 83.3 | 61.9 | 1.1 | 16.7 | 0.6 | 0.0 |
| Total | 72 | 8,451 | 100.0 | 546 | 98.2 | 83.3 | 67.8 | 1.3 | 16.7 | 0.5 | 0.0 |

Source: 2016 D&B data; 1/1/2016 - 12/31/2016 bank data, 2016 CRA aggregate data.
Due to rounding, totals may not equal 100.0.

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2017-18 |
|--|----------------------|--------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|
| AA: | 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 |
| Lincoln MSA | 2 | 500 | 2.5 | 257 | 97.8 | 100.0 | 71.6 | 1.5 | 0.0 | 0.7 | 0.0 |
| Nebraska Non-MSA | 79 | 8,634 | 97.5 | 311 | 97.6 | 89.9 | 57.6 | 1.2 | 10.1 | 1.2 | 0.0 |
| Total | 81 | 9,134 | 100.0 | 568 | 97.8 | 90.1 | 63.9 | 1.3 | 9.9 | 0.9 | 0.0 |

Source: 2018 D&B data, 1/1/2017 - 12/31/2018 bank data, 2017 CRA aggregate data.
Due to rounding, totals may not equal 100.0.