Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

May 18, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust Company
Charter Number: 1926

2 Kelli Court
Clinton, Illinois 61727

Office of the Comptroller of the Currency

2001 Butterfield Road, Suite 400
Downers Grove, IL 60515

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

Contents

Overall CRA Rating 1
Description of Institution 2
Scope of the Evaluation 3
Discriminatory or Other Illegal Credit Practices Review 3
State Rating 5
STATE OF ILLINOIS 5
STATE OF WISCONSIN 7
Appendix A: Scope of Examination A-1
Appendix B: Summary of MMSA and State Ratings B-1
Appendix C: Definitions and Common Abbreviations C-1
Appendix D: Tables of Performance Data D-1

Overall CRA Rating

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

The Lending Test is rated: Satisfactory

The Lending Test rating is based on First National Bank and Trust Company's (FNBT or the Bank) performance in the States of Illinois and Wisconsin.

- FNBT originated or purchased a majority of its loans within its assessment areas (AAs).
- FNBT's satisfactory performance in the State of Illinois.
- FNBT's satisfactory performance in the State of Wisconsin.
- FNBT's loan-to-deposit (LTD) ratio is less than reasonable.

Loan-to-Deposit Ratio

Considering FNBT's size, financial condition, and the credit needs of its AAs, the Bank's LTD ratio is less than reasonable. During the 12-quarter period ending December 31, 2025, the Bank's quarterly LTD ratio averaged 33.8 percent, with a high of 38.2 percent in fourth quarter of 2025 and a low of 31.1 percent in the fourth quarter of 2024. The LTD ratio is calculated on a bank wide basis.

The Office of the Comptroller of the Currency (OCC) compared FNBT's quarterly LTD ratio to 11 similarly situated financial institutions in the AAs, including the surrounding counties, with asset sizes between $100.6 million and $713.4 million. The combined quarterly peer group average was 79.7 percent, ranging from 33.8 percent to 131.1 percent. FNBT ranked the lowest amongst the 12 banks.

Lending in Assessment Area

FNBT originated or purchased a majority of its loans inside its AAs during the evaluation period. Specifically, the Bank purchased or originated 68.8 percent of its loans inside its AAs. This analysis was performed at the Bank rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										**2023 - 2025**
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000s)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Small Business	25	62.5	15	37.5	40	6,616	56.1	5,171	43.9	11,787
Small Farm	30	75.0	10	25.0	40	7,902	78.8	2,122	21.2	10,025
Total	**55**	**68.8**	**25**	**31.3**	**80**	**14,518**	**66.6**	**7,293**	**33.4**	**21,812**
Source: A random sample of 80 Small Business/Farm loans originated or purchased 1/1/2023 - 12/31/2025 *Due to rounding, totals may not equal 100.0%*										

Description of Institution

FNBT is a $386.4 million (in total assets) multi-state financial institution headquartered in Clinton, Illinois. The Bank is a wholly owned subsidiary of TS Contrarian Bancshares located in Treynor, Iowa. Other affiliated financial institutions include The Bank of Tioga, located in North Dakota, and TS Bank, located in Iowa.

FNBT has two rating areas, the State of Illinois and the State of Wisconsin, and two delineated AAs. The first AA is composed of all CTs within DeWitt County, Illinois, which the Bank serves with one full-service branch and two ATMs. The second AA is composed of all CTs within Trempealeau County, Wisconsin, which the Bank serves with three full-service branches and four ATMs. FNBT offers a full range of conventional loan, deposit, asset management, and online banking products and services. Over the evaluation period, the Bank closed one full-service branch in Independence, Wisconsin.

As of December 31, 2025, the Bank's net securities totaled $200 million, which represents 51.8 percent of total assets, while the net loan portfolio totaled $142 million, which represents only 36.7 percent of total assets. The Bank's historic strategic focus on long duration investments, leveraged by short term wholesale funding such as brokered deposits, coupled with the sustained higher rate environment has had a detrimental impact on the Bank's financial performance. Over the evaluation period, the Bank has generated a negative return on average assets of -0.80 percent for 2023, -0.08 percent for 2024, and -0.21 percent for 2025. Since July 2025, the Bank has been operating under formal enforcement action with conditions related to capital requirements, strategic planning, liquidity risk management, and the contingency funding plan. However, we determined these legal and financial impediments did not have a significant impact on the Bank's ability to meet the credit needs of its local communities. The Bank originated or purchased 846 loans with a total dollar volume of $200.2 million from 2023 through 2025. Lending strategies are centered in small business, small farm, and home mortgage activities.

FNBT received a "Satisfactory" rating as a result of its last performance evaluation dated August 8, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated FNBT's CRA performance using Interagency Small Bank examination procedures, which assesses the Bank's record of meeting the credit needs of its AAs through lending activities. The evaluation period for this review was from January 1, 2023, through December 31, 2025. Based upon our review of the number and dollar volume of loans originated or purchased during the evaluation period, FNBT's primary lending products are business and farm loans, representing 47.7 percent and 32.4 percent of the dollar volume of loans originated or purchased, respectively. Business loans, owing to their large volume of originations, received more weight when determining ratings.

We completed loan sampling of small business and small farm loans to complete our analysis.

For analysis purposes, we compared FNBT's lending performance with demographic data from the 2020 U.S. Census, 2025 Dun and Bradstreet data, Bureau of Labor Statistics data, and Federal Deposit Insurance Corporation (FDIC) market share data. Other reports used include the Report of Condition and Income (Call Report) dated December 31, 2025.

Selection of Areas for Full-Scope Review

FNBT has two AAs, one located in the State of Illinois, and one located in the State of Wisconsin. For our review, we performed a full-scope analysis on both the DeWitt County, Illinois, Non-MSA AA and the Trempealeau County, Wisconsin, Non-MSA AA. Both AAs are composed of all contiguous census tracts (CTs) within their respective counties. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The Bank's overall rating is a blend of the state ratings, as of December 31, 2025. Examiners gave equal weight to the overall performance in both the states of Illinois and Wisconsin. According to the 2025 FDIC Deposit Market Share Report, 69.8 percent of the Bank's deposits are sourced from Illinois. However, 53.6 percent of the number of loans purchased or originated and a majority of bank branches are located in Wisconsin. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national 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 Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- FNBT's distribution of loans to businesses and farms of different sizes within the State of Illinois is reasonable.
- FNBT did not receive any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Illinois

FNBT's DeWitt County Non MSA AA consists of all CTs in DeWitt County, meets the requirements of CRA, and does not arbitrarily exclude any low- or moderate-income geographies. As of December 31, 2025, the AA included three middle-income CTs, two upper-income CTs, and according to the 2020 U.S. Census had a population of 15,516. In 2025, The Federal Financial Institutions Examiantion Council determined all three middle-income CTs to be Underserved Nonmetropolitan Tracts. The Bank serves its customers through its headquarters and two ATMs located in Clinton, IL, the county seat and largest municipality within the AA.

Competition
Competition for deposits in the AA is low. According to the June 30, 2025, FDIC Deposit Market Share Report, FNBT's deposits in the area totaled $269 million, or 47.8 percent of the AA's total market share. FNBT ranked first out of four FDIC insured institutions competing for the area's $562.5 million in deposits

Employment and Economic Factors
According to the Bureau of Labor Statistics (BLS), the unemployment rate in the AA generally improved from the peak in January 2023. As of December 31, 2025, the unemployment rate for DeWitt County (4.5 percent) was lower than the state average (4.8 percent). DeWitt County's economic activity is anchored by row-crop agricultural production, which is common in rural central Illinois. Other primary employers include Constellation Energy, Warner Hospital & Health Services, HNC Products Inc., and the local school districts. Many residents commute to Bloomington and Decatur for employment.

Annual Unemployment Rate				
	2023	**2024**	**2025**	**Peak**
DeWitt County	4.10%	3.90%	4.50%	5.00%
State of Illinois	4.40%	4.30%	4.80%	5.70%

Source: U.S. Bureau of Labor Statistics. Unemployment rates are as of December 31 of each year. DeWitt peak is as of January 2023. Illinois peak is as of July 2024.

During the 2023-2025 evaluation period, there were 398 businesses and 57 farms, of which 78.9 percent and 96.5 percent reported revenues less than $1 million respectively.

Dewitt County

Assessment Area(s) - DeWitt County						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.00	0.00	60.00	40.00	0.00
Population by Geography	15,516	0.00	0.00	60.80	39.20	0.00
Housing Units by Geography	7,578	0.00	0.00	60.83	39.17	0.00
Owner-Occupied Housing by Geography	5,129	0.00	0.00	55.53	44.47	0.00
Occupied Rental Units by Geography	1,603	0.00	0.00	77.73	22.27	0.00
Vacant Units by Geography	846	0.00	0.00	60.99	39.01	0.00
Businesses by Geography	398	0.00	0.00	62.56	37.44	0.00
Farms by Geography	57	0.00	0.00	52.63	47.37	0.00
Family Distribution by Income Level	4,153	16.66	16.64	21.96	44.74	0.00
Household Distribution by Income Level	6,732	18.64	17.08	18.40	45.87	0.00
Unemployment rate (%)	4.82	0.00	0.00	5.05	4.46	0.00
Households Below Poverty Level (%)	10.16	0.00	0.00	11.14	8.64	0.00
Median Family Income (Non-MSAs - IL)		$67,835			Median Housing Value	$120,800
Median Family Income (Non-MSAs - IL) for 2025		$86,600			Median Gross Rent	$675
					Families Below Poverty Level	6.16

FFIEC File - 2024 Census
2025 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Community Contact

The OCC relied on information from an interview of an organization that promotes economic development in DeWitt County. They indicated that the local economy has been strengthened during the review period. Two large manufacturers moved into the county, improving job availability, and the local agricultural industry has remained stable. They mentioned a continued need for small business lending, home loans for low- and moderate-income individuals, and education of borrowers to ensure they are informed of the appropriate program that meets their credit needs. The community contact described that FNBT was active in lending and facilitating grants for small businesses.

Scope of Evaluation in Illinois

The OCC completed a full scope review of the DeWitt County AA to determine a Lending Test rating for the State of Illinois.

LENDING TEST

The Bank's performance under the Lending Test in Illinois is rated **Satisfactory.**

Conclusion for Area Receiving a Full Scope Review

Based on a full-scope review, the Bank's performance in the DeWitt County AA is reasonable.

Distribution of Loans by Income Level of the Geography

No geographic distribution analysis was completed for this evaluation. The analysis would not be meaningful, as the AA has no low- or moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

The Bank exhibited a reasonable distribution of loans to businesses and farms of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

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

For the 2023-2025 evaluation period, FNBT's distribution of loans to businesses of different sizes in the AA was reasonable. Bank lending exceeded the aggregate peer lending that occurred to businesses with $1 million or less in annual gross revenue but remained below the percentage of businesses within the AA with $1 million or less in annual gross revenue.

Small Loans to Farms

Refer to Table 12 in the State of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to farms. Only 19 small farm loans could be identified within the AA.

For the 2023-2025 evaluation period, FNBT's distribution of loans to farms of different sizes in the AA was reasonable. Bank lending exceeded the aggregate peer lending that occurred to farms with $1 million or less in annual gross revenue but remained below the percentage of farms within the AA with $1 million or less in annual gross revenue.

Responses to Complaints

FNBT did not receive any complaints regarding its CRA performance during the evaluation period.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- FNBT's distribution of loans to businesses of different sizes within the State of Wisconsin is reasonable.

- FNBT's distribution of loans to farms of different sizes within the State of Wisconsin is excellent.

- FNBT did not receive any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Wisconsin

FNBT's Trempealeau County Non MSA AA consists of all CTs in Trempealeau County, meets the requirements of CRA, and does not arbitrarily exclude any low- or moderate-income geographies. As of December 31, 2025, the AA consists of eight middle-income CTs and according to the 2020 U.S. Census has a population of 30,760. In 2025, The Federal Financial Institutions Examination Council determined all eight middle-income CTs to be Underserved Nonmetropolitan Tracts. The Bank serves its customers through three full-service branches and four ATMs.

Competition
Competition for deposits in the AA is moderate. According to the June 30, 2025, FDIC Deposit Marekt Share Report, FNBTs deposits in the area totaled $116.6 million, or 17 percent of the AA's total market share. FNBT ranked third out of eight FDIC insured institutions competing for the area's $688.4 million in deposits.

Employment and Economic Factors
According to the BLS, the unemployment rate in the AA generally improved from the peak in February 2023. As of December 31, 2025, the unemployment rate for Trempealeau County (3.6 percent) was above the state average (3.0 percent). Trempealeau County's economy is centered in manufacturing and agricultural sectors. Industries include furniture products, food processing, and healthcare.

Annual Unemployment Rate				
	2023	**2024**	**2025**	**Peak**
Trempealeau County	2.90%	3.40%	3.60%	4.70%
State of Wisconsin	2.50%	2.90%	3.00%	3.90%

Source: U.S. Bureau of Labor Statistics. Unemployment rates are as of December 31 of each year. Trempealeau peak is as of February 2023. Wisconsin peak is as of February 2025

During the 2023-2025 evaluation period, there were 825 businesses and 139 farms, of which 79.8 percent and 98.6 percent reported revenues less than $1 million, respectively.

Trempealeau County

Assessment Area(s) - Trempealeau County						
						2023 - 2025
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	8	0.00	0.00	100.00	0.00	0.00
Population by Geography	30,760	0.00	0.00	100.00	0.00	0.00
Housing Units by Geography	13,219	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	8,767	0.00	0.00	100.00	0.00	0.00
Occupied Rental Units by Geography	3,376	0.00	0.00	100.00	0.00	0.00
Vacant Units by Geography	1,076	0.00	0.00	100.00	0.00	0.00
Businesses by Geography	825	0.00	0.00	100.00	0.00	0.00

Assessment Area(s) - Trempealeau County						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Farms by Geography	139	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	7,702	15.83	19.00	25.27	39.91	0.00
Household Distribution by Income Level	12,143	19.46	17.46	20.96	42.12	0.00
Unemployment rate (%)	2.48	0.00	0.00	2.48	0.00	0.00
Households Below Poverty Level (%)	7.54	0.00	0.00	7.54	0.00	0.00
Median Family Income (Non-MSAs - WI)		$71,403			Median Housing Value	$158,050
Median Family Income (Non-MSAs - WI) for 2025		$92,800			Median Gross Rent	$737
					Families Below Poverty Level	3.73

FFIEC File - 2024 Census
2025 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Community Contact

The OCC relied on information from an organization that promotes economic development within Trempealeau County. They indicated the local economy continues to struggle in the post-pandemic environment and mentioned a continued need for small business lending as the primary credit need of the local area.

Scope of Evaluation in Wisconsin

The OCC completed a full scope review of the Trempealeau County AA to determine a Lending Test rating for the State of Wisconsin.

LENDING TEST

The Bank's performance under the Lending Test in Wisconsin is rated **Satisfactory.**

Conclusion for Area Receiving a Full Scope Review

Based on a full-scope review, the Bank's performance in the Trempealeau County AA is reasonable.

Distribution of Loans by Income Level of the Geography

No geographic distribution analysis was completed for this evaluation. The analysis would not be meaningful, as the AA has no low or moderate income CTs.

Distribution of Loans by Income Level of the Borrower

The Bank exhibited a reasonable distribution of loans to businesses and farms of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

Refer to Table 10 in the State of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank’s originations and purchases of small loans to businesses.

For the 2023-2025 evaluation period, FNBT’s distribution of loans to businesses of different sizes in the AA was reasonable. Bank lending was near the aggregate peer lending that occurred to businesses with

$1 million or less in annual gross revenue but remained below the percentage of businesses within the AA with $1 million or less in annual gross revenue.

Small Loans to Farms

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

For the 2023-2025 evaluation period, FNBT's distribution of loans to farms of different sizes in the AA was excellent. Bank lending exceeded the aggregate peer lending that occurred to farms with $1 million or less in annual gross and was comparable to the percentage of Farms within the AA with $1 million or less in annual gross revenue.

Responses to Complaints

FNBT did not receive any complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2023 to 12/31/2025	
Bank Products Reviewed:	Small business, small farm, qualified investments, and community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Illinois		
DeWitt County	Full-scope	All CTs within DeWitt County/Non-MSA
Wisconsin		
Trempealeau County	Full-scope	All CTs within Trempealeau County/Non-MSA

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
FNBT	Satisfactory
State:	
Illinois	Satisfactory
Wisconsin	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/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 annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: (1) the percentage distribution of businesses with revenues of greater than $1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to $500,000) originated and purchased by the bank to farms with revenues of $1 million or less to: (1) the percentage distribution of farms with revenues of greater than $1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

State of Illinois

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023 - 2025
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
DeWitt County	20	4,918	100.00	334	78.89	70.00	56.89	4.02	30.00	17.09	0.00
Source: FFIEC File - 2024 Census; A random sample of 20 Small Business Loans from 1/1/2023 - 12/31/2025, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2023 - 2025
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
DeWitt County	19	6,061	100.00	93	96.49	57.89	43.01	1.75	42.1	1.75	0.00
Source: FFIEC File - 2024 Census; A random sample of 19 Small Farm Loans from 1/1/2023 - 12/31/2025, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*											

State of Wisconsin

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023 - 2025
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Trempealeau County	20	4,931	100.00	468	79.76	50.00	54.49	4.61	50.00	15.64	0.00
Source: FFIEC File - 2024 Census; A random sample of 20 Small Business Loans from 1/1/2023 - 12/31/2025, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2023 - 2025
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Trempealeau County	20	3,318	100.00	118	98.56	95.00	25.42	0.72	5.00	0.72	0.00
Source: FFIEC File - 2024 Census; A random sample of 20 Small Farm Loans from 1/1/2023 - 12/31/2025, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.											