Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

July 13, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Park Bank National Association
Charter Number: 25291

1200 S Main Street
Holmen, WI 54636

Office of the Comptroller of the Currency

222 S 9th Street, Suite 800
Minneapolis, MN 55402

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of the bank's loans are inside its assessment areas (AAs).
- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is excellent.
- There are no complaints regarding the bank's CRA performance.

Loan-to-Deposit Ratio

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

Park Bank, National Association (Park Bank) had an average LTD ratio of 48.66 percent from the third quarter of 2020 though the fourth quarter of 2025 (22 quarters). The bank's quarterly LTD ratio ranged from a low of 36.98 percent in the fourth quarter of 2025 to a high of 63.04 percent in the third quarter of 2020.

Park Bank's average LTD ratio ranked fourth out of four similarly situated institutions. Similarly situated institutions had total assets ranging from $80 million to $382 million and operated at least one location in the bank's AA during the evaluation period. Similarly situated institutions had average LTD ratios ranging from 48.66 percent to 116.83 percent.

Park Bank sells home mortgages to the secondary market, which impacts the bank's LTD ratio. Home mortgages sales totaled $127 million from 2020 through 2025. We adjusted the year-end LTD ratios to include the sale of home mortgages. The adjusted average LTD ratio was 84.09 percent, which is closer to similarly situated banks and would rank Park Bank second among the group.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs. The bank originated and purchased 77.20 percent of loans by number and 76.08 percent of loans by dollar inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

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		
	#	%	#	%		$	%	$	%	
Home Mortgage	149	77.20	44	22.80	193	19,269	76.08	6,057	23.92	25,326
Total	**149**	**77.20**	**44**	**22.80**	**193**	**19,269**	**76.08**	**6,057**	**23.92**	**25,326**

Source: 1/1/2023 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Park Bank is a $79.7 million single-state national bank headquartered in Holmen, Wisconsin (WI). The bank has two other locations: one in La Crosse, WI, and one in Sparta, WI. The bank does not have any deposit taking automated teller machines (ATMs). There were no mergers, acquisitions, branch openings, or branch closings during the evaluation period. Park Bank converted from a state bank to national bank effective September 2, 2023. Park Bank is wholly owned by Golden Oak Bancshares, Inc., a single bank holding company also headquartered in Holmen, WI. For this evaluation, the bank had two AAs and one state rating area.

Park Bank offers traditional banking products and services. According to the December 31, 2025 Call Report, the bank's loan portfolio totaled $26.5 million or 33 percent of total assets. The bank's loan portfolio by dollar consists of 65 percent home mortgage loans, 29 percent commercial loans, four percent consumer loans, and two percent agriculture loans. As of December 31, 2025, the bank's tier one capital totaled $10.7 million and tier one leverage ratio was 13.54 percent.

There are no known financial, legal, or other factors impeding the bank's ability to help meet the credit needs of its AAs. Park Bank received a "Satisfactory" rating in its previous CRA Performance Evaluation dated November 2, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Park Bank's CRA performance using small bank performance standards consisting of the Lending Test. The evaluation period for the Lending Test was January 1, 2023, through December 31, 2025.

For the Lending Test, we selected the primary loan product for each AA based on the number and dollar volume of loan originations and purchases during the evaluation period. We determined the primary product to be home mortgage loans in both AAs. Home mortgage loans represented the highest lending activity by dollar and number. Examiners used home mortgage loan data collected and reported in the bank's Home Mortgage Disclosure Act (HMDA) loan application register (LAR). In preparation for this evaluation, examiners completed a separate data integrity review and confirmed the HMDA LAR data was accurate and reliable.

Selection of Areas for Full-Scope Review

The bank has two AAs, which both received a full-scope review. Refer to Appendix A, Scope of Examination, for details on the bank's AAs.

Ratings

The bank's overall rating is based on the rating for the State of Wisconsin since it is the only rating area. The State of Wisconsin rating is based on performance in the bank's two AAs. Refer to the "Scope"

section under the state rating section for details regarding how the AAs were weighted in arriving at the respective rating.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is excellent.
- There are no complaints regarding the bank's CRA performance.

Description of Institution's Operations in Wisconsin

During the evaluation period, Park Bank had two AAs in Wisconsin, which are referred to throughout this evaluation as the La Crosse MSA and WI Non-MSA.

La Crosse MSA
The La Crosse MSA AA includes the main office located in Holmen and a branch located in La Crosse. The bank's La Crosse MSA AA consisted of the entirety of La Crosse County for the full evaluation period. The Office of Management and Budget's (OMB) July 2023 Bulletin revised MSA delineations effective January 1, 2024. While it did not change the bank's AA delineation, the OMB update impacted the demographics of the MSA, including La Crosse County. As such, performance in this AA was separated into two analysis periods, 2023 and 2024-2025. In 2023, the La Crosse MSA AA consisted of twenty-eight total census tracts (CTs): one low-income, five moderate-income, fifteen middle-income, five upper-income, and two unknown-income CTs. During the 2024-2025 evaluation period the La Crosse MSA AA consisted of twenty-eight total CTs: one low-income, four moderate-income, thirteen middle-income, eight upper-income, and two unknown-income CTs.

Competition in the market was significant. The June 2025 FDIC Deposit Market Share Report noted 17 deposit-taking institutions with 38 locations within La Crosse County. Park Bank ranked thirteenth with a deposit market share of 1.63 percent. The top three institutions by market share were U.S. Bank, National Association (N.A.), Associated Bank, N.A., and Citizens State Bank of La Crosse. These institutions had a combined deposit market share of 42.77 percent.

We reviewed two recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the AA. One contact works for the City of La Crosse in a community development role. The contact said affordable housing is a challenge and all types of housing are in short supply in La Crosse. Hospitals in the area are expanding and creating more high-quality jobs but it has added pressure on the housing market. The contact indicated zoning restrictions in the area make the construction of multi-family housing units difficult and many people in the area prefer single family housing. The second contact works for an organization that offers a wide range of community services to low- and moderate-income individuals in La Crosse, Crawford, Monroe, and Vernon counties. The contact stated that the residential property

vacancy rate in 2024 was at a historical low. The first-time home buyer market slowed due to an affordable housing shortage and the impact of a higher interest rate environment. The contact said the local housing stock of rental properties is very old, not well maintained, and of poor quality. Contacts identified a need for financing affordable housing projects and participation in financial literacy programs for first-time home buyers. The following tables provide demographic and economic data for the AA during the evaluation period.

Assessment Area - La Crosse MSA						
						2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.57	17.86	53.57	17.86	7.14
Population by Geography	120,784	2.07	18.80	57.78	16.69	4.66
Housing Units by Geography	50,680	1.81	18.63	58.64	15.80	5.11
Owner-Occupied Housing by Geography	30,074	0.04	13.01	66.94	19.51	0.50
Occupied Rental Units by Geography	18,031	4.93	27.19	44.81	10.75	12.32
Vacant Units by Geography	2,575	0.74	24.31	58.52	7.84	8.58
Businesses by Geography	3,777	1.96	18.80	51.15	15.91	12.18
Farms by Geography	178	0.56	8.43	71.91	17.42	1.69
Family Distribution by Income Level	27,311	16.62	19.07	24.36	39.95	0.00
Household Distribution by Income Level	48,105	22.58	17.06	19.51	40.85	0.00
Unemployment rate (%)	3.48	4.06	4.50	2.51	4.33	7.67
Households Below Poverty Level (%)	11.48	56.56	17.41	6.22	5.12	55.71
Median Family Income (29100 - La Crosse-Onalaska, WI-MN MSA)		$81,684			Median Housing Value	$178,200
Median Family Income (29100 - La Crosse-Onalaska, WI-MN MSA) for 2023		$93,400			Median Gross Rent	$889
					Families Below Poverty Level	4.08

FFIEC File - 2020 Census
2023 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

Assessment Area - La Crosse MSA						
						2024 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.57	14.29	46.43	28.57	7.14
Population by Geography	120,784	2.07	14.90	45.85	32.52	4.66
Housing Units by Geography	50,680	1.81	14.00	48.55	30.53	5.11
Owner-Occupied Housing by Geography	30,074	0.04	9.44	53.09	36.94	0.50
Occupied Rental Units by Geography	18,031	4.93	21.27	41.20	20.28	12.32
Vacant Units by Geography	2,575	0.74	16.27	47.03	27.38	8.58
Businesses by Geography	3,434	1.40	13.37	44.70	28.68	11.85
Farms by Geography	170	0.59	7.06	57.65	33.53	1.18
Family Distribution by Income Level	27,311	15.58	18.02	23.89	42.51	0.00
Household Distribution by Income Level	48,105	22.04	16.76	19.27	41.93	0.00
Unemployment rate (%)	3.48	4.06	4.48	2.52	3.74	7.67
Households Below Poverty Level (%)	11.48	56.56	18.23	7.20	5.35	55.71
Median Family Income (29100 - La Crosse-Onalaska, WI-MN MSA)		$78,648			Median Housing Value	$178,200
Median Family Income (29100 - La Crosse-Onalaska, WI-MN MSA) for 2025		$105,300			Median Gross Rent	$889
					Families Below Poverty Level	4.08

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

WI Non-MSA

The WI Non-MSA AA is comprised of all of Monroe County and includes one branch in Sparta. The WI Non-MSA AA consists of nine total CTs: one moderate-income, seven middle-income, and one upper-income CT.

Competition in the market is moderate. The June 2025 FDIC Deposit Market Share Report noted eight deposit-taking institutions with 13 locations within Monroe County. Park Bank ranked eighth with a deposit market share of 0.62 percent. The top three institutions by market share were Bank First, N.A., Citizens Community Federal N.A., and River Bank. These institutions had a combined deposit market share of 70.74 percent.

We interviewed a new community contact and reviewed a recently completed community contact to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions in the AA. The recently completed contact was an individual from the City of Sparta. The contact estimated that roughly 2,000 people could move to the Sparta area within the next five years, and in 2024, demand for single-family housing units was high with a low inventory of affordable housing. The contact did not identify any unmet credit needs in the area and noted favorable experiences with local banks. The new contact was an individual at a local economic development agency that serves nine counties in west central WI, including Monroe County. The contact stated that economic conditions are stable in the area and diversified across manufacturing, health care, transportation, tourism, and agriculture. The contact stated that banks need to be more creative in how they finance homeownership because the requirement of a large downpayment is a barrier to many aspiring homeowners. The following table provides demographic and economic data for the AA during the evaluation period.

Assessment Area - WI Non-MSA						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.00	11.11	77.78	11.11	0.00
Population by Geography	46,274	0.00	9.13	78.38	12.48	0.00
Housing Units by Geography	20,000	0.00	10.53	78.53	10.95	0.00
Owner-Occupied Housing by Geography	12,750	0.00	5.95	80.66	13.40	0.00
Occupied Rental Units by Geography	5,275	0.00	21.14	74.10	4.76	0.00
Vacant Units by Geography	1,975	0.00	11.75	76.56	11.70	0.00
Businesses by Geography	1,231	0.00	13.89	72.79	13.32	0.00
Farms by Geography	193	0.00	4.66	72.54	22.80	0.00
Family Distribution by Income Level	11,835	17.97	18.22	24.01	39.80	0.00
Household Distribution by Income Level	18,025	19.94	17.61	19.60	42.84	0.00
Unemployment rate (%)	2.25	0.00	2.91	2.31	1.33	0.00
Households Below Poverty Level (%)	9.20	0.00	8.33	9.59	7.25	0.00
Median Family Income (Non-MSAs - WI)		$71,403			Median Housing Value	$168,600
Median Family Income (Non-MSAs - WI) for 2025		$92,800			Median Gross Rent	$816
					Families Below Poverty Level	6.62

FFIEC File - 2020 Census
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

Scope of Evaluation in Wisconsin

The Wisconsin state rating is based on the performance in the La Crosse MSA AA and the WI Non-MSA AA. Both AAs were selected for a full-scope review.

The La Crosse MSA carried the most weight in determining the state rating as it contained the largest portion of the bank's branches, deposits, and loan volume within the state. The La Crosse MSA represented 67 percent of branches, 91 percent of deposits, and 93 percent of total loan originations by number during the evaluation period.

The La Crosse MMSA had two separate analysis periods, 2023 and 2024-2025. The bank's performance in the 2024-2025 analysis period received more weight when determining combined conclusions as it accounted for a higher portion of the bank's lending activity.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the La Crosse MSA AA and the WI Non-MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State of Wisconsin.

Home Mortgage Loans

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

La Crosse MSA
During the 2023 analysis period, the geographic distribution of home mortgage loans is reasonable. The bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units in those geographies and the aggregate lending percentage. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in those geographies and the aggregate lending percentage.

During the 2024-2025 analysis period, the geographic distribution of home mortgage loans is reasonable. The bank did not lend in low-income geographies during this evaluation period. Park Bank's La Crosse branch is located within the single low-income CT in the AA. The percentage of owner-occupied housing units was low at 0.04 percent, which equates to 12 homes. The aggregate lending percentage was 0.57 percent, and further supports that there were limited lending opportunities in the low-income CT. Additionally, competition had an impact with four banks operating within the CT. The

bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in those geographies and the aggregate lending percentage.

WI Non-MSA
The geographic distribution of home mortgages is reasonable. The AA contained no low-income CTs. The bank did not lend in the single moderate-income CT, which contains the city of Tomah and is about 20 minutes away from the bank's closest location in Sparta. There were six other banks in the moderate-income CT. One of our community contacts stated that the population within the AA generally prefers to bank with local banks in their town.

Lending Gap Analysis

There are no unexplainable conspicuous gaps in lending to LMI geographies within the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels.

Home Mortgage Loans

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

La Crosse MSA
During the 2023 analysis period, the distribution of home mortgage loans to individuals of different income levels is excellent. The bank's percentage of home mortgage loans to low-income borrowers exceeded the aggregate lending percentage and was below the percentage of low-income families in the AA. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the aggregate lending percentage and the percentage of moderate-income families in the AA.

During the 2024-2025 analysis period, the distribution of home mortgage loans to individuals of different income levels is excellent. The bank's percentage of home mortgage loans to low-income borrowers exceeded the aggregate lending percentage and was below the percentage of low-income families in the AA. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the aggregate lending percentage and the percentage of moderate-income families in the AA.

WI Non-MSA
The distribution of home mortgage loans to individuals of different income levels is reasonable. The bank's percentage of home mortgage loans to low- and moderate-income borrowers was below the aggregate lending percentages and the percentages of low- and moderate-income families in the AA.

Responses to Complaints

The bank received no CRA related complaints since the prior CRA evaluation.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2023 to 12/31/2025	
Bank Products Reviewed:	Home mortgage loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Wisconsin		
La Crosse MSA	Full-scope	La Crosse County
WI Non-MSA	Full-scope	Monroe County

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Park Bank, National Association	Satisfactory
MMSA or State:	
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 (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 7. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table 8. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

State of Wisconsin

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
La Crosse MSA	44	4,783	100.00	2,663	0.04	2.27	1.20	13.01	11.36	16.00	66.94	68.18	63.91	19.51	11.36	16.64	0.50	6.82	2.25
Total	**44**	**4,783**	**100.00**	**2,663**	**0.04**	**2.27**	**1.20**	**13.01**	**11.36**	**16.00**	**66.94**	**68.18**	**63.91**	**19.51**	**11.36**	**16.64**	**0.50**	**6.82**	**2.25**
Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
La Crosse MSA	88	11,918	100.00	2,786	0.04	0.00	0.57	9.44	10.23	10.09	53.09	55.68	50.61	36.94	32.95	36.76	0.50	1.14	1.97
Total	**88**	**11,918**	**100.00**	**2,786**	**0.04**	**0.00**	**0.57**	**9.44**	**10.23**	**10.09**	**53.09**	**55.68**	**50.61**	**36.94**	**32.95**	**36.76**	**0.50**	**1.14**	**1.97**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
WI Non-MSA	17	2,569	100.00	1,722	0.00	0.00	0.00	5.95	0.00	7.61	80.66	94.12	81.24	13.40	5.88	11.15	0.00	0.00	0.00
Total	**17**	**2,569**	**100.00**	**1,722**	**0.00**	**0.00**	**0.00**	**5.95**	**0.00**	**7.61**	**80.66**	**94.12**	**81.24**	**13.40**	**5.88**	**11.15**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
La Crosse MSA	44	4,783	100.00	2,663	16.62	9.09	8.90	19.07	20.45	18.36	24.36	22.73	25.72	39.95	47.73	35.15	0.00	0.00	11.87
Total	**44**	**4,783**	**100.00**	**2,663**	**16.62**	**9.09**	**8.90**	**19.07**	**20.45**	**18.36**	**24.36**	**22.73**	**25.72**	**39.95**	**47.73**	**35.15**	**0.00**	**0.00**	**11.87**
Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
La Crosse MSA	88	11,918	100.00	2,786	15.58	9.09	8.04	18.02	20.45	18.88	23.89	25.00	24.30	42.51	40.91	36.07	0.00	4.55	12.71
Total	**88**	**11,918**	**100.00**	**2,786**	**15.58**	**9.09**	**8.04**	**18.02**	**20.45**	**18.88**	**23.89**	**25.00**	**24.30**	**42.51**	**40.91**	**36.07**	**0.00**	**4.55**	**12.71**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
WI Non-MSA	17	2,569	100.00	1,722	17.97	5.88	7.55	18.22	17.65	20.33	24.01	29.41	24.45	39.80	41.18	33.97	0.00	5.88	13.70
Total	**17**	**2,569**	**100.00**	**1,722**	**17.97**	**5.88**	**7.55**	**18.22**	**17.65**	**20.33**	**24.01**	**29.41**	**24.45**	**39.80**	**41.18**	**33.97**	**0.00**	**5.88**	**13.70**
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			