



PUBLIC DISCLOSURE

May 17, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

National Exchange Bank and Trust
Charter Number: 13879

130 South Main St.
Fond du Lac, WI 54936

Office of the Comptroller of the Currency

1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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 National Exchange Bank and Trust (NEBAT) with respect to the Lending, Investment, and Service Tests:

Performance Levels	National Exchange Bank and Trust (NEBAT) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		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:

- NEBAT’s lending levels reflect excellent responsiveness to the credit needs in its assessment areas (AAs), taking into account the number and amount of home mortgage and small business loans in its AAs. A substantial majority of NEBAT’s loans are made in its AAs. The bank exhibited reasonable geographic distribution and excellent borrower distribution. Community Development (CD) lending had a neutral impact on the overall Lending Test rating.
- NEBAT has an adequate level of qualified investments and demonstrates good responsiveness to credit, community, and economic needs.
- NEBAT’s service delivery systems are accessible to geographies and individuals of different income levels in its AAs. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and LMI individuals.

Lending in Assessment Area

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

The bank originated and purchased 76.7 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	513	79.4	133	20.6	646	69,603	70.3	29,437	29.7	99,040
2019	980	82.3	211	17.7	1,191	119,069	69.2	53,033	30.8	172,102
2020	1,539	81.5	349	18.5	1,888	222,646	76.5	68,379	23.5	291,025
Subtotal	3,032	81.4	693	18.6	3,725	411,318	73.2	150,849	26.8	562,167
Small Business										
2018	653	62.3	396	37.8	1,049	88,416	67.3	43,046	32.7	131,462
2019	658	66.8	327	33.2	985	89,058	66.2	45,406	33.8	134,464
2020	1,210	75.0	403	25.0	1,613	151,476	73.3	55,164	26.7	206,640
Subtotal	2,521	69.1	1,126	30.9	3,647	328,950	69.6	143,616	30.4	472,566
Small Farm										
2018	168	90.8	17	9.2	185	13,738	86.5	2,153	13.5	15,891
2019	194	94.6	11	5.4	205	16,117	90.4	1,720	9.6	17,837
2020	217	95.2	11	4.8	228	19,159	94.0	1,218	6.0	20,377
Subtotal	579	93.7	39	6.3	618	49,014	90.6	5,091	9.4	54,105
Total	6,132	76.7	1,858	23.3	7,990	789,282	72.5	299,556	27.5	1,088,838
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

NEBAT is a federally chartered intrastate bank headquartered in Fond du Lac, Wisconsin. NEBAT is a full-service bank with 35 banking offices throughout central and eastern Wisconsin. During the evaluation period, the NEBAT completed a whole-bank acquisition of NBW Bank in January 2020, purchased two branches from Wisconsin Bank & Trust located in Chilton and Elkhart Lake, WI, and one branch from Fortifi Bank located in Westfield, WI. NEBAT is a wholly owned subsidiary of NEB Corporation, a holding company headquartered also in Fond du Lac, WI. The holding company is controlled by the members that also control the Stone Foundation (Foundation). The Foundation has provided grants to support the activities of local nonprofit groups. At the bank's request, we considered qualified investments of the Foundation in the evaluation of the bank's Investment Test performance. As of March 31, 2021, NEBAT had total assets of \$2.58 billion, total loans of \$1.18 billion, and tier 1 capital of \$411 million.

The bank's business strategy has historically been to operate with a community bank orientation while offering a wide range of products, including traditional lending, deposit, and treasury management products and services to individual and corporate customers, as well as trust services. As of March 31, 2021, the bank's loans represent 45.69 percent of total assets. The loan portfolio consists of

78.69 percent commercial loans, 14.58 percent residential real estate loans, 5.03 percent agricultural loans, and 1.84 percent consumer loans.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received a Satisfactory rating in its previous Large Bank CRA evaluation, dated May 22, 2018. The Lending Test was rated High Satisfactory, the Investment Test was rated Low Satisfactory, and the Service Test was rated High Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

NEBAT was evaluated using the Large Bank procedures to assess the bank's record of meeting the credit needs of its community. Large Bank procedures include a Lending Test, Investment Test, and Service Test. The evaluation period for the Lending Test is January 1, 2018 through December 31, 2020. For the Lending Test, we evaluated home mortgage loans, which include home purchase, home improvement, refinance, and multifamily loans reported under the Home Mortgage Disclosure Act (HMDA). We evaluated small loans to businesses and farms reported from the bank's CRA lending data. The evaluation period for CD loans, the Investment Test, and the Service Test is May 22, 2018 through December 31, 2020.

When evaluating the bank's performance, we considered the number and dollar volume of loans for each loan product. As a percent of total loans, home mortgage loans represented 46.62 percent by number and 51.63 percent by dollar volume, small business loans represented 45.64 percent by number and 43.40 percent by dollar volume, and small farm loans represented 7.73 percent by number and 4.96 percent by dollar volume. Therefore, performance related to home mortgage loans and small loans to businesses were given primary consideration and equal weight in our analysis and is the basis of our final conclusions.

Selection of Areas for Full-Scope Review

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

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 C.F.R. §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 assessment area 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.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin¹: Satisfactory

The Lending Test is rated: High Satisfactory

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 institution's AAs, considering the number and amount of home mortgage, small business, and small farm loans in its AAs. The institution has made an adequate level of CD loans.
- The institution exhibits adequate geographic distribution of loans in its AAs.
- The institution exhibits an excellent distribution, particularly in its AAs, of loans among individuals of different income levels and businesses (including farms) of different sizes, given the product lines offered by the bank.
- The institution has an adequate level of qualified investments, particularly those that are not routinely provided by private investors, although not always in a leadership role.
- The institution exhibits adequate responsiveness to credit and CD needs.
- The institution's service delivery systems are readily accessible to geographies and individuals of different income levels

Description of Institution's Operations in Wisconsin

NEBAT has designated seven AAs within the state of Wisconsin. The Appleton MSA consists of Calumet county. The Fond du Lac MSA consists of Fond du Lac county. The Madison MSA consists of Columbia county. The Milwaukee-Waukesha MSA consists of portions of Washington and Waukesha counties. The Oshkosh-Neenah MSA consists of Winnebago County. The Sheboygan MSA consists of Sheboygan county. The non-MSA AA consists of Dodge, Green Lake, Marquette, and Waushara counties. Based on 2020 FFIEC List of Middle-Income Distressed and Underserved Counties, Marquette County is considered underserved due its remote, rural location. We combined the rural AAs into the non-MSA for evaluation purposes. All of the AAs meet the requirements of CRA regulations and do not arbitrarily exclude LMI tracts.

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

Fond du Lac MSA

The bank's main office is headquartered in Fond du Lac, WI, in a low-income census tract (CT). NEBAT operates 11 branches in the cities of Brandon, Campbellsport, Eden, Fairwater, Fond du Lac (3), Mt. Calvary, New Holstein, Rosendale, and Waupun. One branch in Fond du Lac is located in a moderate-income CT. Automated teller machines (ATMs) are located at each branch location, with seven additional ATMs located in Brandon, Eden, Fond Du Lac, Rosendale, and Waupun.

The Fond du Lac AA includes 20 CTs. There is one low-income CT, one moderate-income CT, 17 middle-income CTs, and one upper-income CT.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2020, the Fond du Lac MSA accounted for approximately 57.06 percent of the bank's total deposits. NEBAT ranks first among 10 deposit-taking institutions with 42.68 percent of the deposit market share.

Employment and Economic Factors

The economy in the Fond du Lac MSA remains stable. Major industry sectors that account for a majority of the employment include manufacturing, trade, transportation, utilities, education, and healthcare. Major employers in the AA include Mercury Marine, Agnesian Healthcare, and Alliance Laundry Systems. The unemployment rate as of February 2021 for Fond du Lac County was 4.2 percent. The unemployment rate for the State of Wisconsin was 4.9 percent during the same period.

Lending opportunities for residential mortgages are somewhat limited in LMI geographies in the AA, particularly the single low-income CT, as there is limited housing inventory in these CTs. Based on 2015 ACS census data, 69.80 percent of the housing inventory is renter-occupied in the low-income CT and 65.93 percent of the housing inventory is renter-occupied in the moderate-income CTs. Inventory by number is also limited in the LMI CTs with a total of 1,947 units in the low-income CT and 3,041 units in the combined moderate-income CTs, compared to 39,338 units in the combined middle- and upper-income CTs. In addition, the low-income tract is comprised of numerous industrial and commercial zones and public use space, limiting the housing inventory and the potential for home lending to LMI borrowers.

Demographic Information of the Assessment Area						
Assessment Area: NEBAT Fond du Lac MSA AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	5.0	85.0	5.0	0.0
Population by Geography	101,920	3.6	5.7	82.0	8.6	0.0
Housing Units by Geography	44,326	4.4	6.9	81.0	7.7	0.0
Owner-Occupied Units by Geography	29,372	1.2	2.5	87.1	9.2	0.0
Occupied Rental Units by Geography	11,697	11.6	17.1	67.5	3.8	0.0
Vacant Units by Geography	3,257	7.4	8.9	75.2	8.4	0.0
Businesses by Geography	5,314	9.1	5.0	78.2	7.7	0.0
Farms by Geography	420	1.2	1.0	86.9	11.0	0.0
Family Distribution by Income Level	27,232	17.0	18.4	25.2	39.4	0.0
Household Distribution by Income Level	41,069	22.5	16.5	20.4	40.5	0.0
Median Family Income MSA - 22540 Fond du Lac, WI MSA		\$67,472	Median Housing Value			\$147,403
			Median Gross Rent			\$694
			Families Below Poverty Level			6.5%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>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>						

Non-MSA

NEBAT operates nine branches in the cities of Beaver Dam, Brownsville, Coloma, Dalton, Kingston, Mayville, Montello, Princeton, and Westfield. The Montello and Westfield branches are located in Marquette County and designated as underserved. All nine branches are located in middle-income CTs. ATMs are located at eight branch locations, with one additional ATM located in Markesan.

The non-MSA AA includes 34 CTs. There is one low-income CT, one moderate-income CT, 29 middle-income CTs, and four upper-income CTs.

According to the FDIC Deposit Market Share Report, as of June 30, 2020, the non-MSA AA accounted for approximately 12.83 percent of the bank's total deposits. NEBAT ranks fifth among 21 deposit-taking institutions with 8.31 percent of the deposit market share. The two largest competitors in the AA include Horicon Bank and Fortifi Bank with a combined market share of 32.38 percent.

Employment and Economic Factors

The economy in the non-MSA AA remains stable. Major industry sectors that account for a majority of the employment include manufacturing, trade, transportation, utilities, education, and healthcare. Major employers in the AA include Metalcraft, Maysteel Industries, Michels Corporation and Mayville Engineering/MEC. The unemployment rate as of February 2021 for Dodge County was 4.4 percent, Green Lake County was 6.1 percent, Marquette County was 6.8, and Waushara County was 6.3 percent. The unemployment rate for the State of Wisconsin was 4.9 percent during the same period.

Lending opportunities for residential mortgages are limited in the moderate-income CT in the AA. There is limited housing inventory in this CT. Based on 2015 ACS census data, 4.45 percent of the housing

inventory is renter-occupied. Inventory by number is also limited with a total of 1,478 units in the moderate-income CT, compared to 64,626 units in the combined middle- and upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: NEBAT Non MSA AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	0.0	2.9	85.3	11.8	0.0
Population by Geography	131,572	0.0	2.5	85.1	12.4	0.0
Housing Units by Geography	66,104	0.0	2.2	86.5	11.3	0.0
Owner-Occupied Units by Geography	38,571	0.0	2.0	83.9	14.0	0.0
Occupied Rental Units by Geography	12,795	0.0	4.5	88.5	7.1	0.0
Vacant Units by Geography	14,738	0.0	0.9	91.5	7.6	0.0
Businesses by Geography	6,700	0.0	3.1	82.4	14.6	0.0
Farms by Geography	724	0.0	0.8	78.5	20.7	0.0
Family Distribution by Income Level	34,038	16.8	19.5	23.8	39.9	0.0
Household Distribution by Income Level	51,366	21.2	16.5	19.9	42.4	0.0
Median Family Income Non-MSAs - WI		\$60,742	Median Housing Value			\$147,308
			Median Gross Rent			\$707
			Families Below Poverty Level			6.6%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>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 Wisconsin

We performed a full-scope review of the Fond du Lac MSA and non-MSA AAs. We performed limited-scope reviews of the Appleton MSA, Madison MSA, Milwaukee-Waukesha MSA, Oshkosh-Neenah MSA, and the Sheboygan MSA. The AAs selected for full-scope review were selected based on their higher percentage of deposits and lending activity. The Fond du Lac MSA accounted for 57.06 percent of deposits, and the non-MSA accounted for 12.83 percent. When evaluating the bank’s performance under the Lending Test, we placed the same emphasis on the bank’s distribution of home loans, small business loans, and small farm loans, with 50.88 percent of state loans made in the Fond du Lac MSA and 19.11 percent made in the non- MSA AA. Primary loan products for this review are products in which the bank originated at least 20 loans within the AA during the evaluation period. In several limited-scope AAs, the bank did not originate at least 20 small farm loans; therefore, an analysis was not performed.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Fond du Lac MSA is excellent, and the performance in the non-MSA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage and small business lending. These lending categories represented the majority of the bank's CRA reportable lending activity.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Lending Activity							2018-2020	
Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Appleton MSA	125	50	6	0	0.0	181	2.9	1.5
Fond du Lac MSA	1,573	1,365	182	12	0.0	3,132	50.9	57.1
Madison MSA	78	100	73	0	0.0	251	4.1	4.4
Milwaukee MSA	292	356	8	2	0.0	658	10.7	14.3
Non MSA	516	418	238	5	0.0	1,177	19.1	12.8
Oshkosh MSA	46	19	0	0	0.0	65	1.1	0.8
Sheboygan MSA	402	213	72	3	0.0	690	11.2	9.1
TOTAL	3,032	2,521	579	22	0.0	6,154	100.0	100.0
Dollar Volume of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Appleton MSA	19,319	4,929	772	0	0.0	25,020	2.9	1.5
Fond du Lac MSA	209,027	162,284	12,616	48,178	0.0	432,105	50.0	57.1
Madison MSA	8,834	14,512	6,444	0	0.0	29,790	3.5	4.4
Milwaukee MSA	59,258	73,983	584	8,500	0.0	142,325	16.5	14.3
Non MSA	55,098	44,697	22,101	14,302	0.0	136,198	15.8	12.8
Oshkosh MSA	6,031	1,105	0	0	0.0	7,136	0.8	0.8
Sheboygan MSA	53,751	27,440	6,497	3,000	0.0	90,688	10.5	9.1
TOTAL	411,318	328,950	49,014	73,980	0.0	863,262	100.0	100.0
<i>Source: Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>								

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Fond du Lac MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the June 30, 2020 FDIC Market Share Report, NEBAT had \$1.0 billion in deposits in the Fond du Lac MSA representing 42.68 percent deposit market share in this MSA. The deposit market share ranked first out of 10 deposit taking institutions in the AA. The deposit market share ranked in the top 10.0 percent in the Fond du Lac MSA.

According to 2019 peer mortgage data, NEBAT had a 13.65 percent market share of home mortgage originations in the Fond du Lac MSA. The market share of home mortgage originations ranked first out of 206 lenders, ranking NEBAT in the top 0.5 percent of all lenders in the AA. The market share ranking of home mortgage originations was less than their deposit market share ranking, but still considered excellent. The bank was ranked first for both deposit market share and institution market share of mortgage loans.

According to 2019 peer small business data, NEBAT had a 24.72 percent market share of small business loan originations in the Fond du Lac MSA. The market share of small business loan originations ranked first out of 54 lenders, ranking NEBAT in the top 1.9 percent of all lenders in the AA. The market share ranking of small business loans was less than their deposit market share, but still considered excellent. The bank was ranked first for both deposit market share and institution market share of small business loans.

According to 2019 peer small farm data, NEBAT had a 21.84 percent market share of small farm loan originations in the Fond du Lac MSA. The market share of small farm loan originations ranked second out of 13 lenders, ranking NEBAT in the top 15.4 percent of all lenders in the AA. The market share ranking of small farm loans was less than their deposit market share, but still considered excellent. The bank was ranked first for deposit market share and second for institution market share of small farm loans.

Non-MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the June 30, 2020 FDIC Market Share Report, NEBAT had \$225.0 million in deposits in the non-MSA AA. NEBAT had an 8.31 percent deposit market share in the non-MSA AA. The deposit market share ranked fifth out of 21 deposit taking institutions in the AA. The deposit market share ranked in the top 23.8 percent in the non-MSA AA.

According to 2019 peer mortgage data, NEBAT had a 3.66 percent market share of home mortgage originations in the non-MSA AA. The market share of home mortgage originations ranked seventh out of 278 lenders, ranking NEBAT in the top 2.5 percent of all lenders in the AA. The market share ranking of home mortgage originations was less than their deposit market share ranking, but still considered excellent. The bank was ranked fifth for deposit market share and seventh for institution market share for home mortgages.

According to 2019 peer small business data, NEBAT had a 6.01 percent market share of small business loan originations in the non-MSA AA. The market share of small business loan originations ranked fifth out of 63 lenders, ranking NEBAT in the top 7.9 percent of all lenders in the AA. The market share

ranking of small business loans was less than their deposit market share, but still considered excellent. The bank was ranked fifth for both deposit market share and institution market share.

According to 2019 peer small farm data, NEBAT had a 28.42 percent market share of small farm loan originations in the non-MSA AA. The market share of small farm loan originations ranked first out of 13 lenders in the AA, ranking NEBAT in the top 7.7 percent of all lenders. The market share ranking of small farm loans is stronger than their deposit market share. The bank was ranked fifth for deposit market share and first for institution market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is adequate. We took into consideration that the Fond du Lac MSA has one low-income CT and one moderate-income CT. According to the 2015 American Community Survey (ACS), 69.80 percent and 12.43 percent of total housing units in low-income CTs were rental or vacant units, respectively. The non-MSA AA has one moderate-income CT and, according to the 2015 ACS, 38.57 percent and 8.66 percent of total housing units were rental or vacant units, respectively.

Fond du Lac MSA

The geographic distribution of home mortgage loans is adequate. The percentage of home mortgage loans in low-income geographies is below the percentage of owner-occupied units in those geographies and below the aggregate lending. The percentage of home mortgage loans in moderate-income geographies is below the percentage of owner-occupied units in those geographies and below the aggregate lending.

Non-MSA

The geographic distribution of home mortgage loans is adequate. There are no low-income CTs and only one moderate-income CT. The percentage of home mortgage loans in moderate-income geographies is below the percentage of owner-occupied units in those geographies and is below the aggregate lending.

Small Loans to Businesses

Refer to table Q in the State of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate.

Fond du Lac MSA

The geographic distribution of small loans to businesses is good. The percentage of small business loans in low-income geographies is below the percentage of businesses in those geographies and exceeds the

aggregate lending. The percentage of home mortgage loans in moderate-income geographies is below the percentage of businesses and slightly below the aggregate lending.

Non-MSA

There are no low-income CTs and only one moderate-income CT. The bank did not originate any loans in the moderate-income CT.

Small Loans to Farms

Refer to table S in the State of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate.

Fond du Lac MSA

The bank did not originate any loans in the low- and moderate-income CTs. Consideration is given to the fact that the bank's primary loan products are home mortgages and small business loans, with less weight placed on small farm loans.

Non-MSA

There are no low-income CTs in this AA. The bank did not originate any loans in the one moderate-income CT. Consideration is given to the fact that the bank's primary loan products are home mortgages and small business loans, with less weight placed on small farm loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed summary reports, maps, and analyzed NEBAT's home mortgages and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The one instance where there are not a lot of home mortgages is located in an area in Fond du Lac that is zoned commercial, and there are no homes to purchase. We held discussions with bank management regarding this situation. There were no other unexplained, conspicuous gaps identified.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The borrower distribution of home mortgage loans is excellent.

Fond du Lac MSA

The borrower distribution of home mortgage loans is excellent. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeds the aggregate

lending. The percentage of home mortgage loans to moderate-income borrowers exceeds the percentage of moderate-income families and is near to the aggregate lending.

Non-MSA

The borrower distribution of home mortgage loans is excellent. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeds the aggregate lending. The percentage of home mortgage loans to moderate-income borrowers exceeds the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is good.

Fond du Lac MSA

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with gross annual revenue of \$1 million or less was below the percentage of those businesses but exceeds the aggregate lending.

Non-MSA

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with gross annual revenue of \$1 million or less was below the percentage of those businesses. The percentage of loans to businesses with gross annual revenues of \$1 million or less exceeded the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

Refer to table T in the State of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to farms is excellent.

Fond du Lac MSA

The borrower distribution of small loans to farms is excellent. The percentage of loans to farms with gross annual revenue of \$1 million or less exceeded the percentage of those farms and aggregate lending.

Non-MSA

The borrower distribution of small loans to farms is excellent. The percentage of loans to farms with gross annual revenue of \$1 million or less exceeded the percentage of those farms and aggregate lending.

Community Development Lending

The institution has made a relatively high level of CD loans.

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.

NEBAT made 12 loans in the Fond du Lac MSA, totaling \$48.18 million, and five loans in the non-MSA AA, totaling \$14.30 million of CD lending in our full-scope review.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The Appleton MSA and Oshkosh-Neenah MSA did not have any low-income or moderate-income CTs; therefore, a geographic distribution analysis would not provide meaningful information. Performance in limited-scope AAs had a neutral impact on the Lending Test rating.

Refer to Tables O through R in the State of Wisconsin section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving a Full-Scope Reviews

Fond du Lac

Based on full-scope reviews, the bank's performance in the Fond du Lac is good. NEBAT has an adequate level of qualified CD investments. NEBAT exhibits good responsiveness to credit, community, and economic development needs. NEBAT does not use innovative and/or complex investments to support CD initiatives.

Non-MSA

Based on full-scope reviews, the bank's performance in the non-MSA is good. NEBAT has an adequate level of qualified CD investments. NEBAT exhibits adequate responsiveness to credit, community, and economic development needs. NEBAT does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Appleton MSA	0	0	2	19	2	0.93	19	0.13	0	0
Fond du Lac MSA	0	0	89	3,180	89	41.20	3,180	22.23	0	0
Madison MSA	0	0	4	40	4	1.85	40	0.28	0	0
Milwaukee MSA	2	225	69	9,086	71	32.87	9,311	65.08	0	0
Non-MSA	0	0	22	808	22	10.19	808	5.65		
Oshkosh MSA	0	0	1	5	1	0.46	5	0.03	0	0
Sheboygan MSA	0	0	27	944	27	12.50	944	6.60	0	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.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Appleton MSA, Madison MSA, Milwaukee MSA, Oshkosh MSA, and the Sheboygan MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Fond du Lac MSA and the non-MSA AA is good.

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											
Assessment Area	Deposits	Branches						Population			
		# 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	
Appleton MSA	1.5	1	2.9	0	0	100.0	0.0	0	0	83.8	16.2
Fond du Lac MSA	57.1	12	34.3	8.3	8.3	83.3	0.0	3.6	5.7	82.0	8.6
Madison MSA	4.4	2	5.7	0	0.0	100.0	0	0	25.6	74.4	0
Milwaukee MSA	14.3	3	8.6	0	0.0	100.0	0.0	0	3.2	32.4	64.4
Non-MSA	12.8	9	25.7	0	0.0	100.0	0.0	0	2.5	85.1	12.4
Oshkosh MSA	0.8	1	2.8	0	0	100.0	0	0	0	100.0	0
Sheboygan MSA	9.1	7	20.0	0	0.0	85.7	14.3	0	13.0	72.2	14.8

Fond du Lac MSA

NEBAT's delivery systems are readily accessible to geographies and individuals of different income levels in the Fond du Lac MSA. Branch distribution in the AA is good with branches accessible to all portions of the AA. One of the 12 branches is located in a low-income CT. The percentage of branches in low-income CTs is higher than the percentage of population in those geographies. One of the 12 branches is located in a moderate-income CT. The percentage of branches in moderate-income CTs is higher than the percentage of population in those geographies.

Alternative delivery systems are readily accessible to individuals residing in the AA. These alternative delivery services include debit cards and ATMs, no-cost telephone and online banking, the ability to pay household bills online, and mobile banking options. Customers can open certain deposit accounts online through the website or over the phone.

Non-MSA

NEBAT's delivery systems are accessible to geographies and individuals of different income levels in the non-MSA AA.

Alternative delivery systems are readily accessible to individuals residing in the AA. These alternative delivery services include debit cards and ATMs, no-cost telephone and online banking, the ability to pay household bills online, and mobile banking options. Customers can open certain deposit accounts online through the website or over the phone.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Appleton MSA	0	0	0	0	0	0
Fond du Lac MSA	0	0	0	0	0	0
Madison MSA	0	1	0	0	-1	0
Milwaukee MSA	0	1	0	0	-1	0
Non MSA	0	2	0	0	-2	0
Oshkosh MSA	0	0	0	0	0	0
Sheboygan MSA	0	1	0	0	-1	0

To the extent changes have been made, 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.

Fond du Lac MSA

To the extent changes have been made, opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. NEBAT did not open or close a branch in the Fond du Lac MSA.

Services and business hours do not vary in a way the inconveniences its AAs, particularly LMI geographies and/or individuals. NEBAT maintains standard business hours and offers traditional

banking products, mortgages, consumer and small business lending, and services at all branch locations in the AA.

Non-MSA

To the extent changes have been made, opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. NEBAT closed two branches located in a middle-income CT.

Services and business hours do not vary in a way the inconveniences its AAs, particularly LMI geographies and/or individuals. NEBAT maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending, and services at all branch locations in the AA.

Community Development Services

The institution provides a relatively high level of CD services.

NEBAT is responsive to the needs of the community. During the evaluation period, employees devoted community service hours to nonprofit organizations that provided services and affordable housing for LMI individuals and families and supported economic development for small businesses.

NEBAT employees from various business lines provided their financial expertise by contributing over 2,000 hours of service to approximately 45 organizations in the AA. They served in the capacity of board members and presenters. These activities supported affordable housing, community development, and economic development.

The following are examples of some of the CD services provided in the AA:

- An employee served on a finance committee of a nonprofit organization to review and assess its financial statements, as well as lead the organization through an annual audit and annual budget planning. The employee used their financial expertise to guide the organization that served LMI individuals.
- Various employees were guest lecturers in personal finance classes. These lectures are held at colleges and high schools.
- An employee is a committee member that is responsible for approval of loan requests from available city/county loan funds. These loans are for the purpose of business, economic development, and housing grants.
- An employee served as a treasurer on the board of directors and provided financial oversight and guidance to a community service organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton MSA, Madison MSA, Milwaukee MSA, Oshkosh MSA, and Sheboygan MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

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:	January 1, 2018 – December 31, 2020	
Bank Products Reviewed:	Home mortgage, small business, small farm loans. Community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wisconsin		
Appleton MSA	Limited-scope	Calumet County
Fond du Lac MSA	Full-scope	Fond du Lac County
Madison MSA	Limited-scope	Columbia County
Milwaukee MSA	Limited-scope	Portion of Washington County and Waukesha County
Non-MSA	Full-scope	Portion of Dodge County, Green Lake County, Marquette County, and Waushara County
Oshkosh MSA	Limited-scope	Portion of Winnebago County
Sheboygan MSA	Limited-scope	Sheboygan County

Appendix B: Summary of MMSA and State Ratings

RATINGS		National Exchange Bank & Trust		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
NEBAT	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Wisconsin	Satisfactory	Satisfactory	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/assessment area.

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §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 census tract 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/assessment area.

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.

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-20

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
NEBAT Appleton MSA AA	125	19,319	4.1	2,261	0.0	0.0	0.0	0.0	0.0	0.0	84.1	95.2	77.4	15.9	4.8	22.6	0.0	0.0	0.0
NEBAT Fond du Lac MSA AA	1,573	209,027	51.9	3,591	1.2	0.9	1.8	2.5	1.3	2.1	87.1	84.3	86.2	9.2	13.5	9.9	0.0	0.0	0.0
NEBAT Madison MSA AA	78	8,834	2.6	2,773	0.0	0.0	0.0	20.1	12.8	19.1	79.9	87.2	80.9	0.0	0.0	0.0	0.0	0.0	0.0
NEBAT Milwaukee MSA AA	292	59,258	9.6	26,574	0.0	0.0	0.0	2.1	1.4	1.9	29.1	68.2	27.0	68.8	30.5	71.1	0.0	0.0	0.0
NEBAT Non-MSA AA	516	55,098	17.0	4,566	0.0	0.0	0.0	2.0	0.4	1.7	83.9	86.8	82.7	14.0	12.8	15.6	0.0	0.0	0.0
NEBAT Oshkosh MSA AA	46	6,031	1.5	708	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NEBAT Sheboygan MSA AA	402	53,751	13.3	4,032	0.0	0.0	0.0	7.7	2.5	7.4	76.3	79.9	75.6	15.9	17.7	17.0	0.0	0.0	0.0
Total	3,032	411,318	100.0	44,505	0.1	0.5	0.1	3.7	1.5	3.3	55.6	83.3	49.0	40.6	14.7	47.5	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-20

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NEBAT Appleton MSA AA	125	19,319	4.6	2,261	15.6	13.9	7.7	17.2	18.4	22.7	27.3	28.0	25.3	39.9	35.2	33.9	0.0	5.6	10.4
NEBAT Fond du Lac MSA AA	1,573	209,027	51.9	3,591	17.0	10.6	9.1	18.4	20.3	23.5	25.2	25.6	24.1	39.4	36.9	32.2	0.0	6.6	11.1
NEBAT Madison MSA AA	78	8,834	2.6	2,773	21.1	24.4	14.9	22.0	17.9	25.9	27.4	34.6	26.8	29.5	20.5	23.3	0.0	3.7	9.1
NEBAT Milwaukee MSA AA	292	59,258	9.6	26,574	11.7	5.5	4.3	13.7	11.0	14.7	20.6	25.7	23.1	54.1	44.2	48.2	0.0	13.7	9.7
NEBAT Non-MSA AA	516	55,098	17.0	4,566	16.8	11.8	6.1	19.5	22.7	18.9	23.8	22.5	23.3	39.9	32.9	39.4	0.0	10.1	12.4
NEBAT Oshkosh MSA AA	46	6,031	1.6	708	13.3	17.4	5.7	17.0	37.5	18.9	26.1	21.7	21.8	43.5	21.7	37.6	0.0	7.5	16.1
NEBAT Sheboygan MSA AA	402	53,751	13.3	4,032	17.7	8.7	8.3	18.4	19.2	22.0	25.6	25.6	24.6	38.3	38.3	34.3	0.0	8.2	10.9
Total	3,032	411,318	100.0	44,505	14.4	10.6	6.1	16.3	19.7	17.7	23.0	25.3	23.7	46.3	36.4	42.3	0.0	7.9	10.3

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
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 2018-20

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NEBAT Appleton MSA AA	50	4,929	2.0	570	0.0	0.0	0.0	0.0	0.0	0.0	87.6	96.0	83.7	12.4	4.0	16.3	0.0	0.0	0.0
NEBAT Fond du Lac MSA AA	1,365	162,284	54.1	1,400	9.1	7.3	5.5	5.0	2.9	3.3	78.2	79.7	82.1	7.7	10.2	9.1	0.0	0.0	0.0
NEBAT Madison MSA AA	100	14,512	4.0	740	0.0	0.0	0.0	33.2	2.0	26.8	66.8	98.0	73.2	0.0	0.0	0.0	0.0	0.0	0.0
NEBAT Milwaukee MSA AA	356	73,983	14.1	11,444	0.0	0.0	0.0	2.3	0.8	2.1	33.7	58.4	29.7	64.1	40.7	68.2	0.0	0.0	0.0
NEBAT Non-MSA AA	418	44,697	16.6	1,466	0.0	0.0	0.0	3.1	0.0	2.3	82.4	88.0	77.8	14.6	12.0	19.9	0.0	0.0	0.0
NEBAT Oshkosh MSA AA	19	1,105	0.8	121	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NEBAT Sheboygan MSA AA	213	27,440	8.4	1,877	0.0	0.0	0.0	16.3	6.1	13.0	68.0	81.7	71.1	15.6	12.2	15.9	0.0	0.0	0.0
Total	2,521	328,950	100.0	17,618	0.9	3.9	0.4	5.9	2.3	4.4	52.4	79.5	46.3	40.9	14.4	48.9	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
2018-20											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NEBAT Appleton MSA AA	50	4,929	2.0	570	79.4	72.0	49.5	5.9	28.0	14.8	0.0
NEBAT Fond du Lac MSA AA	1,365	162,284	54.1	1,400	78.4	61.0	49.9	7.0	39.0	14.6	0.0
NEBAT Madison MSA AA 2020	100	14,512	4.0	740	80.1	76.0	53.6	6.0	24.0	13.9	0.0
NEBAT Milwaukee MSA AA	356	73,983	14.1	11,444	78.7	50.6	45.6	9.6	49.4	11.6	0.0
NEBAT Non-MSA AA	418	44,697	16.6	1,466	79.4	66.3	48.0	6.1	33.7	14.5	0.0
NEBAT Oshkosh MSA AA	19	1,105	0.8	121	85.5	78.9	56.2	4.3	21.1	10.2	0.0
NEBAT Sheboygan MSA AA	213	27,440	8.4	1,877	78.7	66.2	53.8	7.8	33.8	13.5	0.0
Total	2,521	328,950	100.0	17,618	79.0	61.8	47.5	8.3	38.2	12.7	0.0
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018-20

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
NEBAT Appleton MSA AA	6	48	1.2	53	0.0	0.0	0.0	0.0	0.0	0.0	94.1	100.0	98.1	5.9	0.0	1.9	0.0	0.0	0.0
NEBAT Fond du Lac MSA AA	182	2,730	25.6	131	1.2	0.0	1.5	0.5	0.0	0.0	88.2	83.7	81.7	10.2	16.3	16.8	0.0	0.0	0.0
NEBAT Madison MSA AA	73	1,986	14.3	101	0.0	0.0	0.0	11.9	0.0	12.9	88.1	100.0	87.1	0.0	0.0	0.0	0.0	0.0	0.0
NEBAT Milwaukee MSA AA	8	95	1.2	87	0.0	0.0	0.0	1.9	0.0	1.1	36.6	100.0	43.7	61.5	0.0	55.2	0.0	0.0	0.0
NEBAT Non-MSA AA	238	6,934	45.2	242	0.0	0.0	0.0	0.8	0.0	0.0	84.3	88.2	88.0	14.9	11.8	12.0	0.0	0.0	0.0
NEBAT Oshkosh MSA AA	0	0	0.0	13	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NEBAT Sheboygan MSA AA	72	1,945	12.5	125	0.0	0.0	0.0	2.6	0.0	0.0	74.3	57.1	72.0	23.1	42.9	28.0	0.0	0.0	0.0
Total	579	13,738	100.0	752	0.2	0.0	0.3	2.4	0.0	1.9	71.7	85.1	79.9	25.8	14.9	18.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018-20

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
NEBAT Appleton MSA AA	6	772	1.3	53	95.5	100.0	34.0	3.2	0.0	1.4	0.0
NEBAT Fond du Lac MSA AA	182	12,616	32.5	131	95.1	96.2	46.6	4.5	5.6	0.5	0.0
NEBAT Madison MSA AA	73	6,444	12.6	101	95.8	98.6	46.5	1.7	5.0	2.6	0.0
NEBAT Milwaukee MSA AA	8	584	1.5	87	92.9	100.0	42.5	5.3	0.0	1.8	0.0
NEBAT Non-MSA AA	238	22,101	41.1	242	94.7	96.2	51.2	3.7	3.8	1.6	0.0
NEBAT Oshkosh MSA AA	0	0	0.0	13	97.3	0.0	7.7	2.7	0.0	0.0	0.0
NEBAT Sheboygan MSA AA	72	6,497	12.4	125	92.7	94.4	39.2	6.0	5.6	1.2	0.0
Total	579	49,014	100.0	752	94.3	96.4	44.8	4.2	3.6	1.5	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0