WNB Financial, N.A. is involved in a program that directly affects you, our customer, as well as the communities we serve.

The **Community Reinvestment Act (CRA)** was developed by Congress in 1977. It requires financial institutions to help communities meet local financial needs. As our customer, it means that WNB Financial provides credit services to fit your needs, makes many loan types available, and asks for your suggestions and comments on our credit policies. We also work with community groups, local businesses, and all levels of government to improve the area we serve.

# VISION

We are the premier regional financial partner and trusted advisor, providing innovative solutions, creating life-long advocates

# MISSION

We are an independent financial organization that:

- Provides solutions and advice
- Invests in the communities we serve
- Enriches lives

# VALUES

**Performance:** We engage with our clients to proactively understand and fulfill their needs, and exceed their expectations

**Respect:** We communicate with positive intent and work as one team

**Integrity:** We do the right thing for the right reason every time

**Dedication:** We work hard and smart to create success for our clients and our communities

**Excellence:** We embrace challenges, learn constantly, and continually improve

# CORE PURPOSE

To enrich lives, creating success and significance

WNB FINANCIAL
MORE THAN A BANK

WNB FINANCIAL
MORE THAN A BANK

# OUR MISSION

We seek to meet the financial needs of consumers, businesses, farmers, industries, and organizations by providing value-added, quality products and services that are worthy of our customers' trust and respect.

We aim to do this by:

- Focusing on our customers' needs
- Challenging and rewarding our co-workers
- Providing involvement and leadership in our community's affairs
- Maintaining our financial strength and community focus

Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

# PUBLIC DISCLOSURE

November 25, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

WNB Financial, National Association
Charter Number: 10865

204 Main Street
Winona, MN 55987

Office of the Comptroller of the Currency

222 9th Street S
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 community development test is rated:** Satisfactory.

The major factors that support this rating include:

- The bank demonstrated a reasonable dispersion of loans throughout geographies of different income levels and reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The bank did not receive any CRA related complaints during the evaluation period.
- WNB Financials' Community Development (CD) performance shows reasonable responsiveness to AA needs through CD loans, qualified investments, and CD services.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable. The bank's LTD ratio averaged 61.64 percent over the 12 quarters in the evaluation period. The ratio ranged from a high of 71.42 percent in quarter four of 2023 to a low of 52.87 percent in quarter four of 2021. We compared the LTD ratio to five financial institutions that are similarly situated in terms of asset size and assessment area. Similarly situated institutions average LTD ratios range from 61.82 percent to 86.76 percent over the evaluation period.

## Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AAs).

The bank originated and purchased 75 percent of its total loans by number inside the bank's AAs and 72 percent by dollar amount 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 | 751 | 74 | 259 | 26 | 1010 | 151,783 | 70 | 64,308 | 30 | 216,091 |
| Small Business | 123 | 72 | 49 | 28 | 172 | 40,406 | 78 | 11,370 | 22 | 51,977 |
| Consumer | 109 | 80 | 28 | 20 | 137 | 4,407 | 70 | 1,934 | 30 | 6,341 |
| Total | 983 | 75 | 336 | 25 | 1319 | 196,596 | 72 | 77,612 | 28 | 274,409 |

Source: Bank Date from January 1, 2021, to December 31, 2023.
Due to rounding, totals may not equal 100.0%

# Description of Institution

WNB is a $577 million national bank, as of December 31, 2023, and is headquartered in Winona, Minnesota (MN). WNB is a multi-state institution with branch locations in southeastern MN and western Wisconsin (WI). As of our review, there were seven branch locations, including three in Winona (MN), one in Wabasha (MN), one in Kellogg (MN), one in Holmen (WI), and one in Altoona (WI). Each branch has a 24-hour automated teller machine (ATM), and the bank has two additional ATMs inside grocery stores, one in Winona and one in Wabasha. All branch locations are within WNB's AAs, and there are no deposit-taking ATMs. The bank is 100 percent owned by WNB Holding Company, a single bank holding company located in Winona, MN. WNB has non-bank affiliates including an investment center, an insurance agency, a financial services company, and an employee benefit group.

WNB's rating area includes two AAs in MN and two AAs in WI. The branch locations in Winona are within the Winona AA, which includes Winona County, MN as well as portions of Trempealeau County, WI and Buffalo County, WI that do not extend significantly outside of Winona County. The Wabasha and Kellogg branches are in the Wabasha, MN AA, consisting of Wabasha County. The branch location in Altoona, WI lies within the Eau Claire AA, consisting of the entirety of Eau Claire County, WI and Chippewa County, WI. The branch in Holmen, WI is in the Holmen AA. This AA includes all of La Crosse County. Competition within the AAs is strong. Refer to the State Ratings sections below for details about WNB's market share within each AA.

There are no known financial, legal, or other factors that impede WNB's ability to help meet the credit needs of its AAs. WNB received a Satisfactory rating at the previous CRA evaluation dated October 25, 2021.

# Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2021, through December 31, 2023. We determined primary loan products based on the number and dollar of loan originations and purchases during the evaluation period. We determined the primary products to be home mortgages, commercial loans, and consumer loans.

The evaluation period included a census data change in 2022. Due to this, we sampled 2021 loan originations/purchases separately from loan originations/purchases in 2022-2023. We selected an initial sample of 20 commercial and 20 consumer loans for 2021 and 2022-2023 for each AA. We then selected additional loans as needed to have sufficient information to analyze borrower and geographic distributions in each AA. We relied on Home Mortgage Disclosure Act (HMDA) data to complete our home mortgage loan analysis in the different AAs.

The evaluation period for the CD test is January 1, 2021, through December 31, 2023. We reviewed CD loans, donations, investments, and services submitted by bank management. The activities meeting the definition of CD are included in this evaluation.

### Selection of Areas for Full-Scope Review

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

metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

**Ratings**

The bank's overall rating is based on a combination of the Minnesota state rating and the Wisconsin state rating. These ratings are based on performance in all bank AAs. The state of Minnesota is more heavily weighted as it has more branches and overall lending. Refer to the "Scope" section under each state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

# Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national 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 Bureau of Consumer Financial Protection, 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 Minnesota

**CRA rating for the State of Minnesota:** Outstanding
**The Lending Test is rated:** Outstanding
**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is excellent.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.
- WNB's CD performance demonstrates reasonable responsiveness to the CD needs of its AAs

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## Description of Institution's Operations in Minnesota

WNB has two AAs located in Minnesota: one non-MSA AA consisting of all of Winona County and extending into three census tracts in Buffalo and Trempealeau Counties in Wisconsin. The state also includes another AA which consists entirely of Wabasha County, which makes up a portion of the Rochester MSA. WNB has three full-service branches in Winona County and one full-service branch in Wabasha County.

Winona AA
The Winona AA includes all of Winona County and extends into three census tracts in Buffalo and Trempealeau Counties in Wisconsin. The AA had no low-income tracts, one moderate income tract, eleven middle income tracts, and one upper income tract in 2021. The AA had no low- or moderate-income tracts, thirteen middle income tracts, and three upper income tracts in 2022-2023. There were no distressed or underserved tracts throughout the evaluation period.

Deposit competition is high with nine reporting institutions in the AA. According to the June 30, 2023, FDIC Deposit Market Share Report, WNB ranked second out of nine reporting institutions with $330 million in deposits in the AA and a 23.3 percent deposit market share. Merchants Bank, Wells Fargo Bank, and Bremer Bank hold 43 percent, 12 percent, and 11.4 percent deposit market shares, respectively. All other institutions hold less than a 4 percent deposit market share.

The area's economic conditions fluctuate slightly over the evaluation period. According to the Bureau of Labor Statistics, Winona County's annual average unemployment rate was 3.1 percent in 2021, 2.1 percent in 2022, and 2.4 percent in 2023. The 2021 unemployment rate is skewed by the first half of the year when employment rates were higher due to the COVID-19 pandemic. All three years are below Minnesota average unemployment rates. Unemployment rates in Buffalo and Trempealeau counties are slightly higher than Winona County.

| Winona AA Unemployment Rates by County | | | | | |
|---|---|---|---|---|---|
| Annual Average | State of MN | State of WI | Winona County | Buffalo County | Trempealeau County |
| 2021 | 3.7 | 3.8 | 3.1 | 4.3 | 3.8 |
| 2022 | 2.6 | 2.9 | 2.1 | 3.8 | 3.1 |
| 2023 | 2.8 | 3.0 | 2.4 | 4.4 | 3.5 |

We contacted a community member representing community development within the Winona AA. The contact noted that the Winona economy continues to expand with new investments in commercial and manufacturing facilities. In 2023, the City of Winona issued $90.1 million in building permits. The contact felt that manufacturing numbers are improving, but not yet back to pre-pandemic levels. The contact noted that local institutions are meeting the credit needs of the community.

The tables below provide information on the Winona AA demographic composition.

**Table A – Demographic Information of the Assessment Area**

**Assessment Area: Winona 2021**

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|---|---|---|---|---|---|---|
| Geographies (Census Tracts) | 13 | 0.0 | 7.7 | 84.6 | 7.7 | 0.0 |
| Population by Geography | 62,409 | 0.0 | 6.3 | 82.2 | 11.5 | 0.0 |
| Housing Units by Geography | 26,284 | 0.0 | 7.3 | 81.0 | 11.7 | 0.0 |
| Owner-Occupied Units by Geography | 17,121 | 0.0 | 8.3 | 77.7 | 14.1 | 0.0 |
| Occupied Rental Units by Geography | 6,722 | 0.0 | 5.9 | 87.6 | 6.5 | 0.0 |
| Vacant Units by Geography | 2,441 | 0.0 | 4.3 | 86.4 | 9.4 | 0.0 |
| Businesses by Geography | 4,072 | 0.0 | 8.6 | 80.5 | 10.9 | 0.0 |
| Farms by Geography | 498 | 0.0 | 1.6 | 78.3 | 20.1 | 0.0 |
| Family Distribution by Income Level | 14,593 | 14.8 | 16.5 | 24.9 | 43.8 | 0.0 |
| Household Distribution by Income Level | 23,843 | 23.6 | 16.2 | 18.1 | 42.2 | 0.0 |
| Median Family Income Non-MSAs - MN | | $63,045 | Median Housing Value | | | $160,185 |
| Median Family Income Non-MSAs - WI | | $60,742 | Median Gross Rent | | | $595 |
| | | | Families Below Poverty Level | | | 6.2% |

*Source: 2015 ACS and 2021 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

| Table A – Demographic Information of the Assessment Area<br>Assessment Area: Winona 2022/2023 | | | | | | |
|---|---|---|---|---|---|---|
| **Demographic Characteristics** | **#** | **Low % of #** | **Moderate % of #** | **Middle % of #** | **Upper % of #** | **NA* % of #** |
| Geographies (Census Tracts) | 16 | 0.0 | 0.0 | 81.3 | 18.8 | 0.0 |
| Population by Geography | 60,936 | 0.0 | 0.0 | 77.8 | 22.2 | 0.0 |
| Housing Units by Geography | 26,807 | 0.0 | 0.0 | 80.5 | 19.5 | 0.0 |
| Owner-Occupied Units by Geography | 17,878 | 0.0 | 0.0 | 77.8 | 22.2 | 0.0 |
| Occupied Rental Units by Geography | 6,337 | 0.0 | 0.0 | 85.3 | 14.7 | 0.0 |
| Vacant Units by Geography | 2,592 | 0.0 | 0.0 | 87.3 | 12.7 | 0.0 |
| Businesses by Geography | 4,752 | 0.0 | 0.0 | 78.2 | 21.8 | 0.0 |
| Farms by Geography | 571 | 0.0 | 0.0 | 83.9 | 16.1 | 0.0 |
| Family Distribution by Income Level | 14,152 | 14.5 | 16.9 | 24.0 | 44.6 | 0.0 |
| Household Distribution by Income Level | 24,215 | 21.9 | 16.7 | 18.4 | 43.0 | 0.0 |
| Median Family Income Non-MSAs - MN | | $74,737 | Median Housing Value | | | $179,807 |
| Median Family Income Non-MSAs - WI | | $71,740 | Median Gross Rent | | | $700 |
| | | | Families Below Poverty Level | | | 4.8% |

*Source: 2020 U.S. Census and 2023 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

Wabasha AA

The Wabasha AA includes all of Wabasha County and makes up part of the Rochester MSA. The AA had no low-income tracts, two moderate income tracts, and four middle income tracts in 2021. The AA had no low-income tracts, two moderate income tracts, and four middle income tracts in 2021. There were no distressed or underserved tracts throughout the evaluation period.

Deposit competition is high with eight reporting institutions in the AA. According to the June 30, 2023, FDIC Deposit Market Share Report, WNB ranked third out of eight reporting institutions with $122 million in deposits in the AA and a 15.9 percent deposit market share. Foresight Bank, Peoples State Bank of Plainview, and Alliance hold 28 percent, 26 percent, and 12 percent deposit market shares, respectively. All other institutions hold less than a 9 percent deposit market share.

The area's economic conditions fluctuate slightly over the evaluation period. According to the Bureau of Labor Statistics, Wabasha County's annual average unemployment rate was 3.3 percent in 2021, 2.5 percent in 2022, and 2.7 percent in 2023. The 2021 unemployment rate is skewed by the first half of the year when unemployment rates were higher due to the COVID-19 pandemic. All three years are below Minnesota average unemployment rates.

| Wabasha AA Unemployment Rates by County | | | |
|---|---|---|---|
| Annual Average | State of MN | State of WI | Wabasha County |
| 2021 | 3.7 | 3.8 | 3.3 |
| 2022 | 2.6 | 2.9 | 2.5 |
| 2023 | 2.8 | 3.0 | 2.7 |

We contacted a community member representing the city of Wabasha. The contact noted that Wabasha has seen steady growth, development of homes, and investment in local businesses over the previous years. While the economy continues to grow from surrounding area business, Wabasha has shown signs of weakness due to an aging population and declining school enrollment. The contact noted that local financial institutions are meeting the credit needs of the community.

The tables below provide information on the Wabasha AA demographic composition.

| Table A – Demographic Information of the Assessment Area<br>Assessment Area: Wabasha 2021 | | | | | | |
|---|---|---|---|---|---|---|
| **Demographic Characteristics** | **#** | **Low % of #** | **Moderate % of #** | **Middle % of #** | **Upper % of #** | **NA* % of #** |
| Geographies (Census Tracts) | 6 | 0.0 | 33.3 | 66.7 | 0.0 | 0.0 |
| Population by Geography | 21,381 | 0.0 | 32.6 | 67.4 | 0.0 | 0.0 |
| Housing Units by Geography | 10,029 | 0.0 | 35.8 | 64.2 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 7,285 | 0.0 | 33.0 | 67.0 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 1,668 | 0.0 | 48.9 | 51.1 | 0.0 | 0.0 |
| Vacant Units by Geography | 1,076 | 0.0 | 34.6 | 65.4 | 0.0 | 0.0 |
| Businesses by Geography | 1,921 | 0.0 | 37.7 | 62.3 | 0.0 | 0.0 |
| Farms by Geography | 282 | 0.0 | 9.6 | 90.4 | 0.0 | 0.0 |
| Family Distribution by Income Level | 6,191 | 23.1 | 22.2 | 25.2 | 29.5 | 0.0 |
| Household Distribution by Income Level | 8,953 | 25.6 | 19.5 | 21.2 | 33.7 | 0.0 |
| Median Family Income MSA - 40340 Rochester, MN MSA | | $81,036 | Median Housing Value | | | $169,565 |
| | | | Median Gross Rent | | | $720 |
| | | | Families Below Poverty Level | | | 4.9% |

*Source: 2015 ACS and 2021 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

| Table A – Demographic Information of the Assessment Area<br>Assessment Area: Wabasha 2022-2023 | | | | | | |
|---|---|---|---|---|---|---|
| **Demographic Characteristics** | **#** | **Low % of #** | **Moderate % of #** | **Middle % of #** | **Upper % of #** | **NA* % of #** |
| Geographies (Census Tracts) | 6 | 0.0 | 33.3 | 66.7 | 0.0 | 0.0 |
| Population by Geography | 21,387 | 0.0 | 30.1 | 69.9 | 0.0 | 0.0 |
| Housing Units by Geography | 10,248 | 0.0 | 29.2 | 70.8 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 7,204 | 0.0 | 27.8 | 72.2 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 1,877 | 0.0 | 36.5 | 63.5 | 0.0 | 0.0 |
| Vacant Units by Geography | 1,167 | 0.0 | 25.6 | 74.4 | 0.0 | 0.0 |
| Businesses by Geography | 2,117 | 0.0 | 33.5 | 66.5 | 0.0 | 0.0 |
| Farms by Geography | 295 | 0.0 | 11.9 | 88.1 | 0.0 | 0.0 |
| Family Distribution by Income Level | 6,085 | 23.6 | 20.9 | 24.7 | 30.8 | 0.0 |

| | | | | | | |
|---|---|---|---|---|---|---|
| Household Distribution by Income Level | 9,081 | 26.5 | 19.6 | 20.5 | 33.4 | 0.0 |
| Median Family Income MSA - 40340 Rochester, MN MSA | | $94,698 | Median Housing Value | | | $195,891 |
| | | | Median Gross Rent | | | $728 |
| | | | Families Below Poverty Level | | | 4.5% |

*Source: 2020 U.S. Census and 2023 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

## Scope of Evaluation in Minnesota

We completed full-scope reviews of the Winona and Wabasha AAs. The Winona AA was weighted most heavily since it contains three of the five branches in Minnesota, 73 percent of deposits, and majority of the lending activity.

Business loans, consumer loans, and home mortgage loans were the primary products used in the geographic and borrower distribution analyses for both AAs. Home mortgage loans received more weight as they accounted for 44.4 percent and 54.0 percent of total bank originations by dollar.

Refer to the table in appendix A-1 for a list of all AAs under review.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

# LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Minnesota is excellent.

## Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

### *Home Mortgage Loans*

The bank exhibits excellent geographic distribution of home mortgage lending.

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

Winona AA
The geographic distribution of home mortgage lending is excellent. The proportion of loans in moderate income geographies significantly exceeds the proportion of owner-occupied housing units and exceeds aggregate lending performance in 2021. The Winona AA did not contain any low-income geographies in

the evaluation period, so an analysis is not meaningful. The AA also did not have any moderate-income loans in the 2022–2023-time frame.

Wabasha AA
The geographic distribution of home mortgage lending is excellent after considering performance context factors. The Wabasha AA did not contain any low-income tracts throughout the evaluation period. The proportion of loans in moderate income geographies exceeds the proportion of owner-occupied housing units and exceeds the aggregate lending performance in all years of the evaluation period.

***Small Loans to Businesses***

The bank exhibits excellent geographic distribution of loans to small business.

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

Winona AA
The geographic distribution of loans to small businesses is excellent after considering performance context factors. The proportion of small business loans made in moderate-income geographies significantly exceeded the proportion of businesses and aggregate lending performance in 2021. The Winona AA did not contain any low-income geographies in the evaluation period or any moderate-income geographies in 2022-2023, so an analysis is not meaningful.

Wabasha AA
The geographic distribution of small business loans is excellent. The proportion of small business loans made in moderate-income geographies significantly exceeded the proportion of businesses and aggregate lending performance in 2021 and exceeded in 2022-2023. The Wabasha AA did not contain any low-income geographies in the evaluation period, so an analysis is not meaningful.

***Consumer Loans***

The bank exhibits excellent geographic distribution of consumer loans.

Refer to Table U in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Winona AA
The geographic distribution of loans to consumers is excellent after considering performance context factors. The proportion of consumer loans made in moderate-income geographies significantly exceeded the proportion of households in moderate-income geographies and aggregate lending performance in 2021. The Winona AA did not contain any low-income geographies in the evaluation period or any moderate-income geographies in 2022-2023, so an analysis is not meaningful.

Wabasha AA
The geographic distribution of consumer loans is excellent. The proportion of consumer loans made in moderate-income geographies significantly exceeded the proportion of households in moderate-income geographies and aggregate lending performance in 2021 and exceeded in 2022-2023. The Wabasha AA did not contain any low-income geographies in the evaluation period, so an analysis is not meaningful.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### *Home Mortgage Loans*

The borrower distribution of home mortgage lending is reasonable.

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

Winona AA
The borrower distribution of home mortgage lending is reasonable. The proportion of loans to low-income borrowers was below the proportion of low-income families, but exceeded aggregate lending, which was also low compared to demographics in 2021. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was in-line with aggregate lending in 2021. The proportion of loans to low-income borrowers was in-line with the proportion of low-income families and exceeded aggregate lending in 2022-2023. The proportion of loans to moderate-income borrowers significantly exceeded the proportion of moderate-income families and exceeded aggregate lending in 2022-2023.

Wabasha AA
The borrower distribution of home mortgage lending is excellent. The proportion of loans to low-income borrowers was in-line with the proportion of low-income families and significantly exceeded aggregate lending, which is also low compared to demographics in 2021. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and aggregate lending in 2021. The proportion of loans to low-income borrowers significantly exceeded the proportion of low-income families and significantly exceeded aggregate lending in 2022-2023. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and significantly below aggregate lending in 2022-2023.

### *Small Loans to Businesses*

The borrower distribution of small loans to businesses is reasonable.

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

Winona AA
The distribution of loans to businesses by revenue is reasonable. The proportion of small business loans was below the proportion of small businesses, and above the aggregate lending in both 2021and 2022-2023.

Wabasha AA
The distribution of loans to businesses by revenue is reasonable. The proportion of small business loans was below the proportion of small businesses, and above the aggregate lending in both 2021 and 2022-2023.

***Consumer Loans***

The borrower distribution of loans to consumers is excellent.

Refer to Table V in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Winona AA
The distribution of loans to consumers by income is excellent. The proportion of consumer loans to low-income households exceeded the proportion of low-income households in 2021. The proportion of consumer loans to moderate-income households significantly exceeded the proportion of moderate-income households in 2021 and 2022-2023. The proportion of consumer loans to low-income households significantly exceeded the proportion of low-income households in 2022-2023.

Wabasha AA
The distribution of loans to consumers by income is excellent. The proportion of consumer loans to low-income households was above the proportion of low-income households in 2021. The proportion of consumer loans to moderate-income borrowers significantly exceeded the proportion of moderate-income households in 2021. The proportion of consumer loans to low-income households significantly exceeded the proportion of low-income households in 2022-2023. The proportion of consumer loans to moderate-income households exceeded the proportion of moderate-income households in 2022-2023.

**Responses to Complaints**

WNB did not receive any CRA related complaints during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Minnesota is rated satisfactory. Based on a full-scope review, the bank exhibits reasonable responsiveness to community development needs in the state of Minnesota through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

**Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

| **Community Development Loans** | | | | |
|---|---|---|---|---|
| | Total | | | |
| Assessment Area | # | % of Total # | $(000's) | % of Total $ |
| Winona | 3 | 33.3% | $1,026 | 39.42% |
| Wabasha | 6 | 66.6% | $1,577 | 60.58% |

Winona AA
WNB originated three CD loans totaling $1.03 million or 1.8 percent of tier one capital in the Winona AA during the evaluation period. The largest volume of CD loans supported economic development initiatives, including SBA 504 loans for local businesses. Another portion of the bank's CD loans supported affordable housing initiatives such as loans for rental properties where greater than 50 percent of the units were affordable to LMI individuals. Economic development and affordable housing have been identified as credit needs in the community.

Wabasha AA
WNB originated six CD loans totaling $1.57 million or 2.8 percent of tier one capital in the Wabasha AA during the evaluation period. A large portion of these loans supported economic development through SBA 504 loans to local small businesses. An additional loan was qualified under community services to LMI individuals.

**Number and Amount of Qualified Investments**

| **Qualified Investments** | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | $(000's) | # | $(000's) | # | % of Total # | $(000's) | % of Total $ | # | $(000's) |
| Winona | 0 | 0 | 58 | 191.7 | 58 | 90.6 | 191.7 | 98.0 | 0 | 0 |
| Wabasha | 0 | 0 | 6 | 4.0 | 6 | 9.4 | 4.0 | 2.0 | 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.

Winona AA
WNB made 58 qualified investments totaling $191.7 thousand in the Winona AA during the evaluation period. Qualified investments were comprised entirely of donations. Donations primarily supported community services targeted to LMI individuals and economic development.

Wabasha AA
WNB made 6 qualified investments, comprised entirely of donations, totaling $4 thousand in the Wabasha AA during the evaluation period. Donations primarily supported community services targeted to LMI individuals and economic development.

**Extent to Which the Bank Provides Community Development Services**

Winona AA
During the evaluation period, WNB employees provided 504 hours of community service and financial expertise to different organizations in the Winona AA. Approximately 63 percent of hours were spent in activities promoting community services to LMI individuals. 22 percent of hours were spent providing services for affordable housing. 15 percent of hours were spent promoting economic development in the Winona AA.

Wabasha AA

During the evaluation period, WNB employees provided 441 hours of community service and financial expertise to different organizations in the Wabasha AA. All hours of service in the Wabasha AA were spent providing community services to LMI individuals.

# State Rating

## State of Wisconsin

**CRA rating for the State of Wisconsin:** Satisfactory
**The Lending Test is rated:** Satisfactory
**The Community Development 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 and businesses of different sizes is reasonable.
- WNB's CD performance demonstrates reasonable responsiveness to the CD needs of its AAs.

## Description of Institution's Operations in Wisconsin

WNB has two AAs located in Wisconsin. The Eau Claire AA consists of all of Eau Claire and Chippewa Counties. This area also makes up the Eau Claire MSA. The state also includes the Holmen AA, which includes all of La Crosse County, and makes up the La Crosse MSA. WNB has one full-service branch in Altoona, WI and one full-service branch in Holmen, WI.

Eau Claire AA
The Eau Claire AA includes all of Chippewa and Eau Claire Counties. The AA had no low-income tracts, six moderate income tracts, twenty-two middle income tracts, and three upper income tracts in 2021. The AA had no low-income tracts, seven moderate-income tracts, twenty middle-income tracts, and seven upper income tracts in 2022-2023. There were no distressed or underserved tracts throughout the evaluation period.

Deposit competition is high with twenty-two reporting institutions in the AA. According to the June 30, 2023, FDIC Deposit Market Share Report, WNB ranked nineteenth out of twenty-two reporting institutions with $10.9 million in deposits in the AA and a 0.3 percent deposit market share. All institutions outside of the top six in deposit market share hold less than six percent market share.

The area's economic conditions remain relatively stable over the evaluation period. According to the Bureau of Labor Statistics, Eau Claire County's annual average unemployment rate was 3.6 percent in 2021, 2.8 percent in 2022, and 3.0 percent in 2023. The 2021 unemployment rate is skewed by the first half of the year when employment rates were higher due to the COVID-19 pandemic. All three years are in-line with the Wisconsin average unemployment rates.

| **Eau Claire AA Unemployment Rates by County** | | |
|---|---|---|
| Annual Average | State of WI | Eau Claire County |
| 2021 | 3.8 | 3.6 |
| 2022 | 2.9 | 2.8 |
| 2023 | 3.0 | 3.0 |

We contacted a community member representing the city of Eau Claire within the Eau Claire AA. The

contact noted that the Eau Claire economy continues to expand and is one of the fastest growing counties in Wisconsin. The contact noted that the local economy suffered a setback in the evaluation period when a local hospital closed, causing the loss of 1,400 jobs. The contact felt that there is a continued need for affordable housing. The contact noted that local institutions are meeting the credit needs of the community.

The tables below provide information on the Eau Claire AA demographic composition.

| Table A – Demographic Information of the Assessment Area<br>Assessment Area: Eau Claire 2021 | | | | | | |
|---|---|---|---|---|---|---|
| **Demographic Characteristics** | **#** | **Low % of #** | **Moderate % of #** | **Middle % of #** | **Upper % of #** | **NA* % of #** |
| Geographies (Census Tracts) | 31 | 0.0 | 19.4 | 71.0 | 9.7 | 0.0 |
| Population by Geography | 164,490 | 0.0 | 16.6 | 70.9 | 12.5 | 0.0 |
| Housing Units by Geography | 70,238 | 0.0 | 18.0 | 71.2 | 10.8 | 0.0 |
| Owner-Occupied Units by Geography | 42,702 | 0.0 | 11.4 | 77.3 | 11.3 | 0.0 |
| Occupied Rental Units by Geography | 22,064 | 0.0 | 28.4 | 60.5 | 11.2 | 0.0 |
| Vacant Units by Geography | 5,472 | 0.0 | 27.3 | 66.7 | 6.0 | 0.0 |
| Businesses by Geography | 10,103 | 0.0 | 18.4 | 70.7 | 10.9 | 0.0 |
| Farms by Geography | 731 | 0.0 | 13.0 | 78.1 | 8.9 | 0.0 |
| Family Distribution by Income Level | 40,100 | 18.6 | 18.5 | 24.2 | 38.7 | 0.0 |
| Household Distribution by Income Level | 64,766 | 24.3 | 16.3 | 18.3 | 41.1 | 0.0 |
| Median Family Income MSA - 20740 Eau Claire, WI MSA | | $66,688 | Median Housing Value | | | $151,201 |
| | | | Median Gross Rent | | | $721 |
| | | | Families Below Poverty Level | | | 7.2% |

*Source: 2015 ACS and 2021 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

| Table A – Demographic Information of the Assessment Area<br>Assessment Area: Eau Claire 2022-2023 | | | | | | |
|---|---|---|---|---|---|---|
| **Demographic Characteristics** | **#** | **Low % of #** | **Moderate % of #** | **Middle % of #** | **Upper % of #** | **NA* % of #** |
| Geographies (Census Tracts) | 34 | 0.0 | 20.6 | 58.8 | 20.6 | 0.0 |
| Population by Geography | 172,007 | 0.0 | 19.0 | 60.0 | 21.0 | 0.0 |
| Housing Units by Geography | 73,045 | 0.0 | 20.4 | 60.3 | 19.3 | 0.0 |
| Owner-Occupied Units by Geography | 45,766 | 0.0 | 17.3 | 65.2 | 17.5 | 0.0 |
| Occupied Rental Units by Geography | 21,880 | 0.0 | 26.8 | 50.3 | 23.0 | 0.0 |
| Vacant Units by Geography | 5,399 | 0.0 | 20.7 | 60.3 | 19.1 | 0.0 |
| Businesses by Geography | 16,082 | 0.0 | 22.4 | 60.2 | 17.4 | 0.0 |
| Farms by Geography | 943 | 0.0 | 14.0 | 65.2 | 20.8 | 0.0 |
| Family Distribution by Income Level | 41,232 | 18.9 | 18.9 | 23.9 | 38.4 | 0.0 |

| | | | | | | |
|---|---|---|---|---|---|---|
| Household Distribution by Income Level | 67,646 | 22.9 | 17.0 | 19.0 | 41.2 | 0.0 |
| Median Family Income MSA - 20740 Eau Claire, WI MSA | | $79,795 | Median Housing Value | | | $182,891 |
| | | | Median Gross Rent | | | $837 |
| | | | Families Below Poverty Level | | | 5.8% |

*Source: 2020 U.S. Census and 2023 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

Holmen AA

The Holmen AA includes all of La Crosse County and makes up the La Crosse MSA. The AA had one low-income tract, four moderate income tracts, fourteen middle income tracts, and five upper income tracts in 2021. The AA had one low-income tract, five moderate income tracts, fifteen middle income tracts, and five upper income tracts in 2022-2023. There were no distressed or underserved tracts throughout the evaluation period.

Deposit competition is high with seventeen reporting institutions in the AA. According to the June 30, 2023, FDIC Deposit Market Share Report, WNB ranked sixteenth out of seventeen reporting institutions with $9.9 million in deposits in the AA and a .24 percent deposit market share.

The area's economic conditions fluctuate slightly over the evaluation period. According to the Bureau of Labor Statistics, Holmen's annual average unemployment rate was 3.1 percent in 2021, 2.5 percent in 2022, and 2.6 percent in 2023. The 2021 unemployment rate is skewed by the first half of the year when unemployment rates were higher due to the COVID-19 pandemic. All three years are below Wisconsin average unemployment rates.

| **Holmen AA Unemployment Rates by County** | | |
|---|---|---|
| Annual Average | State of WI | Holmen |
| 2021 | 3.8 | 3.1 |
| 2022 | 2.9 | 2.5 |
| 2023 | 3.0 | 2.6 |

We contacted a community member representing La Crosse County. The contact noted that the La Crosse area has seen steady growth, development of homes, and investment in local businesses over the previous years. There are several affordable housing projects under construction in La Crosse. The contact noted that there are plenty of options for consumers when it comes to financial institutions and that local financial institutions are meeting the credit needs of the community.

The tables below provide information on the Holmen AA demographic composition.

| **Table A – Demographic Information of the Assessment Area**<br>**Assessment Area: Holmen 2021** | | | | | | |
|---|---|---|---|---|---|---|
| **Demographic Characteristics** | **#** | **Low % of #** | **Moderate % of #** | **Middle % of #** | **Upper % of #** | **NA* % of #** |
| Geographies (Census Tracts) | 25 | 4.0 | 16.0 | 56.0 | 20.0 | 4.0 |
| Population by Geography | 117,048 | 2.1 | 15.7 | 60.3 | 17.7 | 4.2 |
| Housing Units by Geography | 49,008 | 2.7 | 17.5 | 60.4 | 17.9 | 1.6 |
| Owner-Occupied Units by Geography | 30,084 | 0.4 | 7.8 | 68.2 | 23.2 | 0.4 |

| | | | | | | |
|---|---|---|---|---|---|---|
| Occupied Rental Units by Geography | 16,261 | 6.2 | 33.8 | 47.3 | 8.7 | 4.1 |
| Vacant Units by Geography | 2,663 | 7.2 | 27.6 | 52.3 | 12.8 | 0.0 |
| Businesses by Geography | 6,405 | 12.0 | 16.7 | 56.5 | 13.8 | 1.1 |
| Farms by Geography | 260 | 1.2 | 4.2 | 74.6 | 19.2 | 0.8 |
| Family Distribution by Income Level | 28,033 | 18.3 | 18.9 | 22.1 | 40.6 | 0.0 |
| Household Distribution by Income Level | 46,345 | 21.9 | 17.5 | 19.0 | 41.5 | 0.0 |
| Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA | | $68,531 | Median Housing Value | | | $155,655 |
| | | | Median Gross Rent | | | $761 |
| | | | Families Below Poverty Level | | | 6.7% |

*Source: 2015 ACS and 2021 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

**Table A – Demographic Information of the Assessment Area**

**Assessment Area: Holmen 2022-2023**

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|---|---|---|---|---|---|---|
| Geographies (Census Tracts) | 28 | 3.6 | 17.9 | 53.6 | 17.9 | 7.1 |
| Population by Geography | 120,784 | 2.1 | 18.8 | 57.8 | 16.7 | 4.7 |
| Housing Units by Geography | 50,680 | 1.8 | 18.6 | 58.6 | 15.8 | 5.1 |
| Owner-Occupied Units by Geography | 30,074 | 0.0 | 13.0 | 66.9 | 19.5 | 0.5 |
| Occupied Rental Units by Geography | 18,031 | 4.9 | 27.2 | 44.8 | 10.8 | 12.3 |
| Vacant Units by Geography | 2,575 | 0.7 | 24.3 | 58.5 | 7.8 | 8.6 |
| Businesses by Geography | 10,215 | 1.7 | 17.4 | 52.5 | 16.9 | 11.6 |
| Farms by Geography | 390 | 0.5 | 7.4 | 70.3 | 19.0 | 2.8 |
| Family Distribution by Income Level | 27,311 | 16.6 | 19.1 | 24.4 | 40.0 | 0.0 |
| Household Distribution by Income Level | 48,105 | 22.6 | 17.1 | 19.5 | 40.9 | 0.0 |
| Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA | | $81,684 | Median Housing Value | | | $176,536 |
| | | | Median Gross Rent | | | $882 |
| | | | Families Below Poverty Level | | | 4.1% |

*Source: 2020 U.S. Census and 2023 D&B Data*
*Due to rounding, totals may not equal 100.0%*
*(*) The NA category consists of geographies that have not been assigned an income classification.*

## Scope of Evaluation in Wisconsin

We completed full-scope reviews of the Eau Claire and Holmen AAs. The AAs were weighted equally in the state rating.

Business loans, consumer loans, and home mortgage loans were the primary products used in the geographic and borrower distribution analyses for both AAs. Home mortgage loans received more weight as they accounted for 44.4 percent and 54.0 percent of total bank originations by dollar.

Refer to the table in Appendix A-1 for a list of all AAs under review.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

# LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Wisconsin is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

### *Home Mortgage Loans*

The bank exhibits reasonable geographic distribution of home mortgage lending.

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.

Eau Claire AA
The geographic distribution of home mortgage lending is excellent. The proportion of loans in moderate income geographies exceeds the proportion of owner-occupied housing units and exceeds the aggregate lending performance throughout the evaluation period. The Eau Claire AA did not contain any low-income geographies in the evaluation period, so an analysis is not meaningful.

Holmen AA
The geographic distribution of home mortgage lending is reasonable. The proportion of loans to low- and moderate-income borrowers was in-line with the proportion of low- and moderate-income geographies and aggregate lending performance during the evaluation period.

### *Small Loans to Businesses*

The bank exhibits reasonable geographic distribution of loans to small business.

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.

Eau Claire AA
The geographic distribution of loans to small businesses is poor. The proportion of small business loans made in moderate-income geographies was below the proportion of businesses and aggregate lending performance in 2021 and 2022-2023. The Eau Claire AA did not contain any low-income geographies in the evaluation period, so an analysis is not meaningful.

Holmen AA
The geographic distribution of small business loans is reasonable. The proportion of small business loans made in low-income geographies was below the proportion of businesses and aggregate lending performance in 2021. The proportion of small business loans made in moderate-income geographies was in-line with the proportion of businesses and exceeded aggregate lending performance in 2021. The proportion of small business loans made in low-income geographies exceeded the proportion of businesses and aggregate lending performance in 2022-2023. The proportion of small business loans made in moderate-income geographies significantly exceeded the proportion of businesses and aggregate lending performance in 2022-2023.

***Consumer Loans***

The bank exhibits poor geographic distribution of consumer loans.

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

Eau Claire AA
The geographic distribution of loans to consumers is poor. The proportion of consumer loans made in moderate-income geographies was below the proportion of consumers and aggregate lending performance in 2021 and was significantly below in 2022-2023. The Eau Claire AA did not contain any low-income geographies in the evaluation period, so an analysis is not meaningful.

Holmen AA
The geographic distribution of consumer loans is poor. Due to lack of loan originations and purchases, we only tested in the 2022-2023 period. The bank did not originate or purchase any consumer loans in low- or moderate-income geographies in 2022-2023.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

***Home Mortgage Loans***

The borrower distribution of home mortgage lending is reasonable.

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.

Eau Claire AA
The borrower distribution of home mortgage lending is reasonable. The proportion of loans to low-income borrowers was below the proportion of low-income families, but exceeded aggregate lending, which was also low compared to demographics in 2021. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and aggregate lending in 2021. The proportion of loans to low-income borrowers was below the proportion of low-income families and

aggregate lending in 2022-2023. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and aggregate lending in 2022-2023.

Holmen AA
The borrower distribution of home mortgage lending is poor. The proportion of loans to low-income borrowers was below the proportion of low-income families and aggregate lending, which is also low compared to demographics in 2021. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and aggregate lending in 2021. The proportion of loans to low-income borrowers was below the proportion of low-income families and aggregate lending in 2022-2023. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and aggregate lending in 2022-2023.

***Small Loans to Businesses***

The borrower distribution of small loans to businesses is reasonable.

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 originations and purchases of small loans to businesses.

Eau Claire AA
The distribution of loans to businesses by revenue is reasonable. The proportion of small business loans was below the proportion of small businesses, and above the aggregate lending in both 2021 and 2022-2023.

Holmen AA
The distribution of loans to businesses by revenue is reasonable. The proportion of small business loans was below the proportion of small businesses, and above the aggregate lending in both 2021 and 2022-2023.

***Consumer Loans***

The borrower distribution of consumer lending is excellent.

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

Eau Claire AA
The distribution of loans to consumers by revenue is excellent. The proportion of consumer loans to low-income households was in-line with the proportion of low-income households in 2021. The proportion of consumer loans to moderate-income households significantly exceeded the proportion of moderate-income households in 2021 and 2022-2023. The proportion of consumer loans to low-income households significantly exceeded the proportion of low-income households in 2022-2023.

Holmen AA
The distribution of loans to consumers by revenue is reasonable. The proportion of consumer loans to low-income households was below the proportion of low-income households in 2022-2023. The proportion of consumer loans to moderate-income borrowers exceeded the proportion of moderate-income households in 2022-2023. We did not test consumer loans in the AA in 2021 due to the lack of a meaningful sample size of purchases and originations.

**Responses to Complaints**

WNB did not receive any CRA related complaints during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Wisconsin is rated satisfactory. Based on full-scope review, the bank exhibits reasonable responsiveness to community development needs in the state of Wisconsin through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

**Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

| **Community Development Loans** | | | | |
|---|---|---|---|---|
| Assessment Area | Total | | | |
| | # | % of Total # | $(000's) | % of Total $ |
| Holmen | 1 | 33.3% | $606 | 27.29% |
| Eau Claire | 2 | 66.6% | $1,615 | 72.71% |

Holmen AA
WNB originated one CD loan totaling $606 thousand or 1.0 percent of tier one capital in the Holmen AA during the evaluation period. This loan financed affordable housing to LMI individuals.

Eau Claire AA
WNB originated two CD loans totaling $1.62 million or 2.9 percent of tier one capital in the Eau Claire AA during the evaluation period. These financed small business loans that created and retained jobs for LMI individuals.

**Number and Amount of Qualified Investments**

| **Qualified Investments** | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | $(000's) | # | $(000's) | # | % of Total # | $(000's) | % of Total $ | # | $(000's) |
| Holmen | 0 | 0 | 14 | $16.3 | 14 | 66% | $16.3 | 68.67% | 0 | 0 |
| Eau Claire | 0 | 0 | 11 | $7.0 | 11 | 44% | $7.0 | 31.33% | 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.

Eau Claire AA
WNB made 11 qualified investments, comprised entirely of donations, totaling $7 thousand in the Eau Claire AA during the evaluation period. Donations were to organizations for the purpose of supporting LMI individuals and supporting economic development.

Holmen AA
WNB made 14 qualified investments, comprised entirely of donations, totaling $16.3 thousand in the Holmen AA during the evaluation period. Donations were to organizations for the purpose of supporting LMI individuals and supporting economic development.

**Extent to Which the Bank Provides Community Development Services**

Eau Claire AA
During the evaluation period, WNB employees provided 9 hours of community service and financial expertise to an organization in the Eau Claire AA. All hours of service in the Eau Claire AA were spent providing community services to LMI individuals.

Holmen AA
During the evaluation period, WNB employees provided 103.5 hours of community service and financial expertise to six different organizations in the Holmen AA. All hours were spent providing community services to organizations that directly support LMI individuals.

# 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 MSA(s) and non-MSA(s) 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:** | (01/01/2021-12/31/2023) | |
|---|---|---|
| **Bank Products Reviewed:** | (Residential Real Estate loans, Commercial loans, Consumer loans, Community development loans, qualified investments, and community development services.) | |
| **List of Assessment Areas and Type of Examination** | | |
| **Rating and Assessment Areas** | **Type of Exam** | **Other Information** |
| **Minnesota** | | |
| Winona | Full Scope | Includes tracts in Buffalo and Trempealeau Counties |
| Wabasha | Full Scope | |
| **Wisconsin** | | |
| Eau Claire | Full Scope | |
| Holmen | Full Scope | |

# Appendix B: Summary of MMSA and State Ratings

| RATINGS WNB Financial | | | |
|---|---|---|---|
| Overall Bank: | Lending Test Rating* | CD Test Rating | Overall Bank/State/ Multistate Rating |
| WNB Financial | Satisfactory | Satisfactory | Satisfactory |
| State: | | | |
| Minnesota | Outstanding | Satisfactory | Outstanding |
| Wisconsin | Satisfactory | Satisfactory | Satisfactory |
| | | | |
| | | | |
| | | | |
| | | | |

(*) The Lending Test and Community Development Test carry equal weight 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 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 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 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**.**

**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.

**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 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/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 arrogate 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Minnesota** **2021**

| 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 |
| Wabasha | 61 | 10,409,400 | 22.7 | 1,013 | 0.0 | 0.0 | 0.0 | 33.0 | 47.5 | 33.8 | 67.0 | 52.5 | 66.2 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Winona | 208 | 36,811,883 | 77.3 | 2,373 | 0.0 | 0.0 | 0.0 | 8.3 | 13.0 | 6.9 | 77.7 | 73.6 | 79.6 | 14.1 | 13.5 | 13.5 | 0.0 | 0.0 | 0.0 |
| **Total** | **269** | **47,221,283** | **100.0** | **3,386** | **0.0** | **0.0** | **0.0** | **15.6** | **20.8** | **14.9** | **74.5** | **68.8** | **75.6** | **9.9** | **10.4** | **9.5** | **0.0** | **0.0** | **0.0** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Minnesota** **2022-23**

| 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 |
| Wabasha | 58 | 9,518,240 | 25.9 | 442 | 0.0 | 0.0 | 0.0 | 27.8 | 56.9 | 35.3 | 72.2 | 43.1 | 64.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Winona | 166 | 33,392,733 | 74.1 | 1,175 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 77.8 | 88.0 | 77.3 | 22.2 | 12.0 | 22.7 | 0.0 | 0.0 | 0.0 |
| **Total** | **224** | **42,910,973** | **100.0** | **1,617** | **0.0** | **0.0** | **0.0** | **8.0** | **14.7** | **9.6** | **76.2** | **76.3** | **73.8** | **15.8** | **8.9** | **16.5** | **0.0** | **0.0** | **0.0** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Wisconsin** **2021**

| 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 |
| Eau Claire | 60 | 12,357,620 | 45.8 | 8,857 | 0.0 | 0.0 | 0.0 | 11.4 | 15.0 | 11.3 | 77.3 | 66.7 | 76.3 | 11.3 | 18.3 | 12.4 | 0.0 | 0.0 | 0.0 |
| Holmen | 71 | 14,879,228 | 54.2 | 6,149 | 0.4 | 1.4 | 1.0 | 7.8 | 8.5 | 8.4 | 68.2 | 74.6 | 68.2 | 23.2 | 15.5 | 21.8 | 0.4 | 0.0 | 0.5 |
| **Total** | **131** | **27,236,848** | **100.0** | **15,006** | **0.2** | **0.8** | **0.4** | **9.9** | **11.5** | **10.1** | **73.5** | **71.0** | **73.0** | **16.2** | **16.8** | **16.3** | **0.2** | **0.0** | **0.2** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Wisconsin** **2022-23**

| 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 |
| Eau Claire | 35 | 13,455,343 | 27.6 | 3,625 | 0.0 | 0.0 | 0.0 | 17.3 | 17.1 | 19.0 | 65.2 | 68.6 | 64.2 | 17.5 | 14.3 | 16.7 | 0.0 | 0.0 | 0.0 |
| Holmen | 92 | 20,959,126 | 72.4 | 2,614 | 0.0 | 0.0 | 1.2 | 13.0 | 17.4 | 16.1 | 66.9 | 64.1 | 63.9 | 19.5 | 15.2 | 16.6 | 0.5 | 3.3 | 2.2 |
| **Total** | **127** | **34,414,468** | **100.0** | **6,239** | **0.0** | **0.0** | **0.5** | **15.6** | **17.3** | **17.8** | **65.9** | **65.4** | **64.1** | **18.3** | **15.0** | **16.7** | **0.2** | **2.4** | **0.9** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Minnesota** **2021**

| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Assessment Area:** | **#** | **$** | **% of Total** | **Overall Market** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** |
| Wabasha | 61 | 10,409,400 | 22.7 | 1,013 | 23.1 | 23.0 | 14.6 | 22.2 | 26.2 | 25.8 | 25.2 | 23.0 | 25.0 | 29.5 | 23.0 | 22.1 | 0.0 | 4.9 | 12.5 |
| Winona | 208 | 36,811,883 | 77.3 | 2,373 | 14.8 | 9.6 | 8.4 | 16.5 | 20.7 | 20.3 | 24.9 | 23.1 | 24.8 | 43.8 | 33.7 | 34.2 | 0.0 | 13.0 | 12.3 |
| **Total** | **269** | **47,221,283** | **100.0** | **3,386** | **17.3** | **12.6** | **10.3** | **18.2** | **21.9** | **21.9** | **25.0** | **23.0** | **24.8** | **39.6** | **31.2** | **30.6** | **0.0** | **11.2** | **12.4** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Minnesota** **2022-23**

| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Assessment Area:** | **#** | **$** | **% of Total** | **Overall Market** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** |
| Wabasha | 58 | 9,518,240 | 25.9 | 442 | 23.6 | 34.5 | 20.4 | 20.9 | 15.5 | 30.1 | 24.7 | 29.3 | 24.0 | 30.8 | 15.5 | 17.9 | 0.0 | 5.2 | 7.7 |
| Winona | 166 | 33,392,733 | 74.1 | 1,175 | 14.5 | 14.5 | 12.1 | 16.9 | 25.3 | 22.0 | 24.0 | 18.1 | 24.6 | 44.6 | 25.3 | 33.4 | 0.0 | 16.9 | 8.0 |
| **Total** | **224** | **42,910,973** | **100.0** | **1,617** | **17.2** | **19.6** | **14.3** | **18.1** | **22.8** | **24.2** | **24.2** | **21.0** | **24.4** | **40.4** | **22.8** | **29.1** | **0.0** | **13.8** | **7.9** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower – Wisconsin** **2021**

| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Assessment Area:** | **#** | **$** | **% of Total** | **Overall Market** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** |
| Eau Claire | 60 | 12,357,620 | 45.8 | 8,857 | 18.6 | 10.0 | 9.0 | 18.5 | 23.3 | 22.0 | 24.2 | 21.7 | 25.1 | 38.7 | 35.0 | 31.7 | 0.0 | 10.0 | 12.3 |
| Holmen | 71 | 14,879,228 | 54.2 | 6,149 | 18.3 | 5.6 | 9.5 | 18.9 | 12.7 | 20.5 | 22.1 | 29.6 | 23.7 | 40.6 | 42.3 | 32.4 | 0.0 | 9.9 | 14.0 |
| **Total** | **131** | **27,236,848** | **100.0** | **15,006** | **18.5** | **7.6** | **9.2** | **18.7** | **17.6** | **21.4** | **23.3** | **26.0** | **24.5** | **39.5** | **38.9** | **32.0** | **0.0** | **9.9** | **13.0** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Wisconsin** **2022-23**

| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Assessment Area:** | **#** | **$** | **% of Total** | **Overall Market** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** | **% Families** | **% Bank Loans** | **Aggregate** |
| Eau Claire | 35 | 13,455,343 | 27.6 | 3,625 | 18.9 | 2.9 | 7.6 | 18.9 | 14.3 | 20.9 | 23.9 | 14.3 | 24.2 | 38.4 | 42.9 | 34.8 | 0.0 | 25.7 | 12.5 |
| Holmen | 92 | 20,959,126 | 72.4 | 2,614 | 16.6 | 5.4 | 8.6 | 19.1 | 13.0 | 18.6 | 24.4 | 22.8 | 25.7 | 40.0 | 40.2 | 35.1 | 0.0 | 18.5 | 11.9 |
| **Total** | **127** | **34,414,468** | **100.0** | **6,239** | **18.0** | **4.7** | **8.0** | **19.0** | **13.4** | **20.0** | **24.1** | **20.5** | **24.8** | **39.0** | **40.9** | **34.9** | **0.0** | **20.5** | **12.2** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - Minnesota** **2021**

| 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 |
| Wabasha | 20 | 3,105,334 | 50.0 | 291 | 0.0 | 0.0 | 0.0 | 37.7 | 45.0 | 32.4 | 62.3 | 55.0 | 66.9 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Winona | 20 | 5,808,920 | 50.0 | 1,101 | 0.0 | 0.0 | 0.0 | 8.6 | 40.0 | 7.4 | 80.5 | 50.0 | 81.0 | 10.9 | 10.0 | 10.7 | 0.0 | 0.0 | 0.9 |
| **Total** | **40** | **8,914,254** | **100.0** | **1,392** | **0.0** | **0.0** | **0.0** | **18.0** | **42.5** | **11.7** | **74.6** | **52.5** | **78.6** | **7.4** | **5.0** | **8.8** | **0.0** | **0.0** | **0.9** |

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - Minnesota** **2022-23**

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000) | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Wabasha | 20 | 4,238 | 50.0 | 360 | 0.0 | 0.0 | 0.0 | 33.5 | 35.0 | 28.0 | 66.5 | 65.0 | 70.9 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 1.1 |
| Winona | 20 | 10,370 | 50.0 | 824 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 3.6 | 78.2 | 90.0 | 79.8 | 21.8 | 10.0 | 15.1 | 0.0 | 0.0 | 1.5 |
| **Total** | **40** | **14,608** | **100.0** | **1,184** | **0.0** | **0.0** | **0.0** | **10.3** | **17.5** | **9.4** | **74.6** | **77.5** | **77.7** | **15.1** | **5.0** | **11.5** | **0.0** | **0.0** | **1.4** |

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - Wisconsin** **2021**

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000) | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Eau Claire | 18 | 35,783 | 51.4 | 2,426 | 0.0 | 0.00 | 0.0 | 18.4 | 11.1 | 15.4 | 70.7 | 72.2 | 69.8 | 10.9 | 16.7 | 14.1 | 0.0 | 0.0 | 0.6 |
| Holmen | 17 | 6,368 | 48.6 | 1,387 | 12.0 | 5.9 | 9.3 | 16.7 | 17.6 | 12.8 | 56.5 | 52.9 | 56.0 | 13.8 | 23.5 | 20.0 | 1.1 | 0.0 | 2.0 |
| **Total** | 35 | 42,150 | 100.0 | **3,813** | **4.6** | **2.9** | **3.4** | **17.7** | **14.3** | **14.5** | **65.2** | **62.9** | **64.8** | **12.0** | **20.0** | **16.3** | **0.4** | **0.0** | **1.1** |

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - Wisconsin** **2022-23**

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Eau Claire | 20 | 23,778 | 50.0 | 2,552 | 0.0 | 0.0 | 0.0 | 22.4 | 10.0 | 21.2 | 60.2 | 70.0 | 58.8 | 17.4 | 20.0 | 19.5 | 0.0 | 0.0 | 0.6 |
| Holmen | 20 | 9,571 | 50.0 | 1,387 | 1.7 | 5.0 | 0.6 | 17.4 | 25.0 | 16.0 | 52.5 | 20.0 | 53.2 | 16.9 | 50.0 | 18.7 | 11.6 | 0.0 | 11.4 |
| **Total** | 40 | 33,349 | 100.0 | **3,939** | **0.6** | **2.5** | **0.2** | **20.5** | 17.5 | **19.3** | **57.2** | 45.0 | **56.8** | **17.2** | 35.0 | **19.2** | **4.5** | **0.0** | **4.4** |

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - Minnesota** **2021**

| 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 |
| Wabasha | 20 | 3,105,334 | 50.0 | 291 | 87.2 | 65.0 | 51.9 | 4.0 | 35.0 | 8.7 | 0.0 |
| Winona | 20 | 5,808,920 | 50.0 | 1,101 | 82.5 | 65.0 | 42.8 | 5.9 | 35.0 | 11.6 | 0.0 |
| **Total** | 40 | 8,914,254 | 100.0 | **1,392** | **84.0** | 65.0 | **44.3** | **5.3** | 35.0 | **10.7** | **0.0** |

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data,"--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - Minnesota** **2022-23**

| 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 |
| Wabasha | 20 | 4,237,826 | 50.0 | 360 | 88.1 | 70.0 | 50.3 | 3.6 | 30.0 | 8.3 | 0.0 |
| Winona | 20 | 10,369,833 | 50.0 | 824 | 84.6 | 55.0 | 52.8 | 5.0 | 45.0 | 10.4 | 0.0 |
| **Total** | 40 | 14,607,659 | 100.0 | **1,184** | **85.7** | 62.5 | **52.2** | **4.6** | 37.5 | **9.7** | **0.0** |

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data,"--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - Wisconsin** **2021**

| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| Eau Claire | 20 | 35,783 | 50.0 | 2,426 | 80.1 | 50.0 | 47.6 | 6.0 | 50.0 | 13.9 | 0.0 |
| Holmen | 20 | 6,367 | 50.0 | 1,387 | 76.5 | 64.7 | 46.0 | 7.7 | 35.3 | 15.8 | 0.0 |
| **Total** | **40** | **42,150** | **100.0** | **3,813** | **78.7** | **57.5** | **47.0** | **6.7** | **42.5** | **14.6** | **0.0** |

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - Wisconsin** **2022-23**

| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| Eau Claire | 20 | 23,778 | 50 | 2,552 | 86.7 | 80.0 | 48.6 | 3.7 | 20.0 | 9.6 | -- |
| Holmen | 20 | 9,571 | 50 | 1,387 | 84.3 | 60.0 | 46.6 | 4.7 | 40.0 | 11.1 | -- |
| **Total** | **40** | **33,349** | **100** | **3,939** | **85.7** | **70.0** | **47.9** | **4.1** | **30.0** | **10.2** | **--** |

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.*
*Due to rounding, totals may not equal 100.0%*

*WNB Financial (10000220059) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Minnesota** **2021**

| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Wabasha | 20 | 268,223 | 50.0 | 0.0 | 0.0 | 35.9 | 50.0 | 64.1 | 50.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Winona | 20 | 349,562 | 50.0 | 0.0 | 0.0 | 7.6 | 5.0 | 80.5 | 80.0 | 11.9 | 15.0 | 0.0 | 0.0 |
| **Total** | **40** | **617,785** | **100.0** | **0.0** | **0.0** | **15.3** | **27.5** | **76.0** | **65.0** | **8.7** | **7.5** | **0.0** | **0.0** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Minnesota** **2022-23**

| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Wabasha | 20 | 455,141 | 50.0 | 0.0 | 0.0 | 29.6 | 55.0 | 70.4 | 45.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Winona | 20 | 276,878 | 50.0 | 0.0 | 0.0 | 0.0 | 0.0 | 79.8 | 80.0 | 20.2 | 20.0 | 0.0 | 0.0 |
| **Total** | **40** | **732,019** | **100.0** | **0.0** | **0.0** | **8.1** | **27.5** | **77.2** | **62.5** | **14.7** | **10.0** | **0.0** | **0.0** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – Wisconsin** **2021**

| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Eau Claire | 20 | 1,280 | 50 | 0.0 | 0.0 | 17.2 | 10.0 | 71.6 | 70.0 | 11.2 | 20.0 | 0.0 | -- |
| **Total** | **20** | **1,280** | **50** | **0.0** | **0.0** | **17.2** | **10.0** | **71.6** | **70.0** | **11.2** | **20.0** | **0.0** | **--** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – Wisconsin** **2022-23**

| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Eau Claire | 12 | 1,005 | 37.5 | 0.0 | 0.0 | 20.4 | 8.3 | 60.3 | 75.0 | 19.3 | 16.7 | 0.0 | 0.0 |
| Holmen | 20 | 1,317 | 62.5 | 1.9 | 0.0 | 18.3 | 0.0 | 58.6 | 55.0 | 16.2 | 45.0 | 4.9 | 0.0 |
| **Total** | **32** | **2,322** | **100.0** | **0.8** | **0.0** | **19.5** | **3.1** | **59.6** | **62.5** | **18.0** | **34.4** | **2.0** | **0.0** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Minnesota** **2021**

| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Wabasha | 20 | 268,223 | 50.0 | 25.6 | 30.0 | 19.5 | 30.0 | 21.2 | 35.0 | 33.7 | 5.0 | 0.0 | 0.0 |
| Winona | 20 | 349,562 | 50.0 | 23.6 | 30.0 | 16.2 | 35.0 | 18.1 | 15.0 | 42.2 | 15.0 | 0.0 | 5.0 |
| **Total** | **40** | **617,785** | **100.0** | **24.1** | **30.0** | **17.1** | **32.5** | **18.9** | **25.0** | **39.9** | **10.0** | **0.0** | **2.5** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Minnesota** **2022-23**

| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Wabasha | 20 | 455,141 | 62.2 | 26.5 | 50.0 | 19.6 | 25.0 | 20.5 | 20.0 | 33.4 | 5.0 | 0.0 | 0.0 |
| Winona | 20 | 276,878 | 37.8 | 21.9 | 30.0 | 16.7 | 30.0 | 18.4 | 10.0 | 43.0 | 20.0 | 0.0 | 10.0 |
| **Total** | **40** | **732,019** | **100.0** | **23.1** | **40.0** | **17.5** | **27.5** | **19.0** | **15.0** | **40.4** | **12.5** | **0.0** | **5.0** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Wisconsin** **2021**

| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Eau Claire | 20 | 1,280 | 100.0 | 24.3 | 20.0 | 16.3 | 35.0 | 18.3 | 20.0 | 41.1 | 25.0 | 0.0 | 0.0 |
| **Total** | **20** | **1,280** | **100.0** | **24.3** | **20.0** | **16.3** | **35.0** | **18.3** | **20.0** | **41.1** | **25.0** | **0.0** | **0.0** |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Wisconsin** **2022-23**

| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | # | $ (000s) | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans |
| Eau Claire | 20 | 1,005 | 50.0 | 22.9 | 33.3 | 17.0 | 25.0 | 19.0 | 41.7 | 41.2 | 0.0 | 0.0 | 0.0 |
| Holmen | 20 | 1,317 | 50.0 | 22.6 | 10.0 | 17.1 | 20.0 | 19.5 | 25.0 | 40.9 | 45.0 | 0.0 | 0.0 |
| **Total** | **40** | **2,322** | **100.0** | **22.7** | **21.6** | **17.0** | **22.5** | **19.2** | **33.3** | **41.0** | **22.5** | **0.0** | **0.0** |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.*
*Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

WNB FINANCIAL
MORE THAN A BANK

# CRA CUSTOMER COMMENTS

We invite your opinions on our credit policies and practices. Should any person wish to submit comments, please mail them to the following attention of the Bank's CRA Officer:

Sarah Johns
C/O WNB Financial, N.A.
204 Main Street
Winona, MN 55987

**Comments**

No customer comments regarding CRA were received 2024, 2025 through April 1, 2026

# WNB Financial, N.A. Assessment Area

WNB Financial, N.A. has four assessment areas. These consist of the Winona Market, Eau Claire Market, Wabasha Market & Holmen Market. On June 1, 2021 WNB Financial, N.A. opened a new full-service branch in Holmen, WI, adding the county of La Crosse to the assessment area. All branches are included in the assessment areas.

## WINONA MARKET

| MSA/MD Code | State | State Code | County | County Code | Census Tract # |
|---|---|---|---|---|---|
| N/A | MN | 27 | Winona | 169 | 6701.00 |
| | | | | | 6702.00 |
| | | | | | 6703.00 |
| | | | | | 6704.00 |
| | | | | | 6705.00 |
| | | | | | 6706.00 |
| | | | | | 6707.00 |
| | | | | | 6708.00 |
| | | | | | 6709.00 |
| | | | | | 6710.00 |
| N/A | WI | 55 | Buffalo | 011 | 9604.00 |
| | | | | | 9605.00 |
| N/A | WI | 55 | Trempealeau | 121 | 1007.00 |

# EAU CLAIRE MARKET

| MSA/MD Code | State | State Code | County | County Code | Census Tract # |
|---|---|---|---|---|---|
| 20740 | WI | 55 | Eau Claire | 035 | 0001.00 |
| | | | | | 0002.00 |
| | | | | | 0003.01 |
| | | | | | 0003.02 |
| | | | | | 0004.00 |
| | | | | | 0005.01 |
| | | | | | 0005.02 |
| | | | | | 0006.00 |
| | | | | | 0007.00 |
| | | | | | 0008.01 |
| | | | | | 0008.02 |
| | | | | | 0008.03 |
| | | | | | 0009.00 |
| | | | | | 0011.01 |
| | | | | | 0012.00 |
| | | | | | 0013.00 |
| | | | | | 0014.01 |
| | | | | | 0014.02 |
| | | | | | 0015.00 |
| | | | | | 0016.00 |
| | | | | | 0017.00 |
| 20740 | WI | 55 | Chippewa | 017 | 0101.00 |
| | | | | | 0102.00 |
| | | | | | 0103.00 |
| | | | | | 0104.00 |
| | | | | | 0105.00 |
| | | | | | 0107.00 |
| | | | | | 0108.00 |
| | | | | | 0109.00 |
| | | | | | 0110.01 |
| | | | | | 0110.02 |
| | | | | | 0111.00 |
| | | | | | 0112.00 |

# WABASHA MARKET

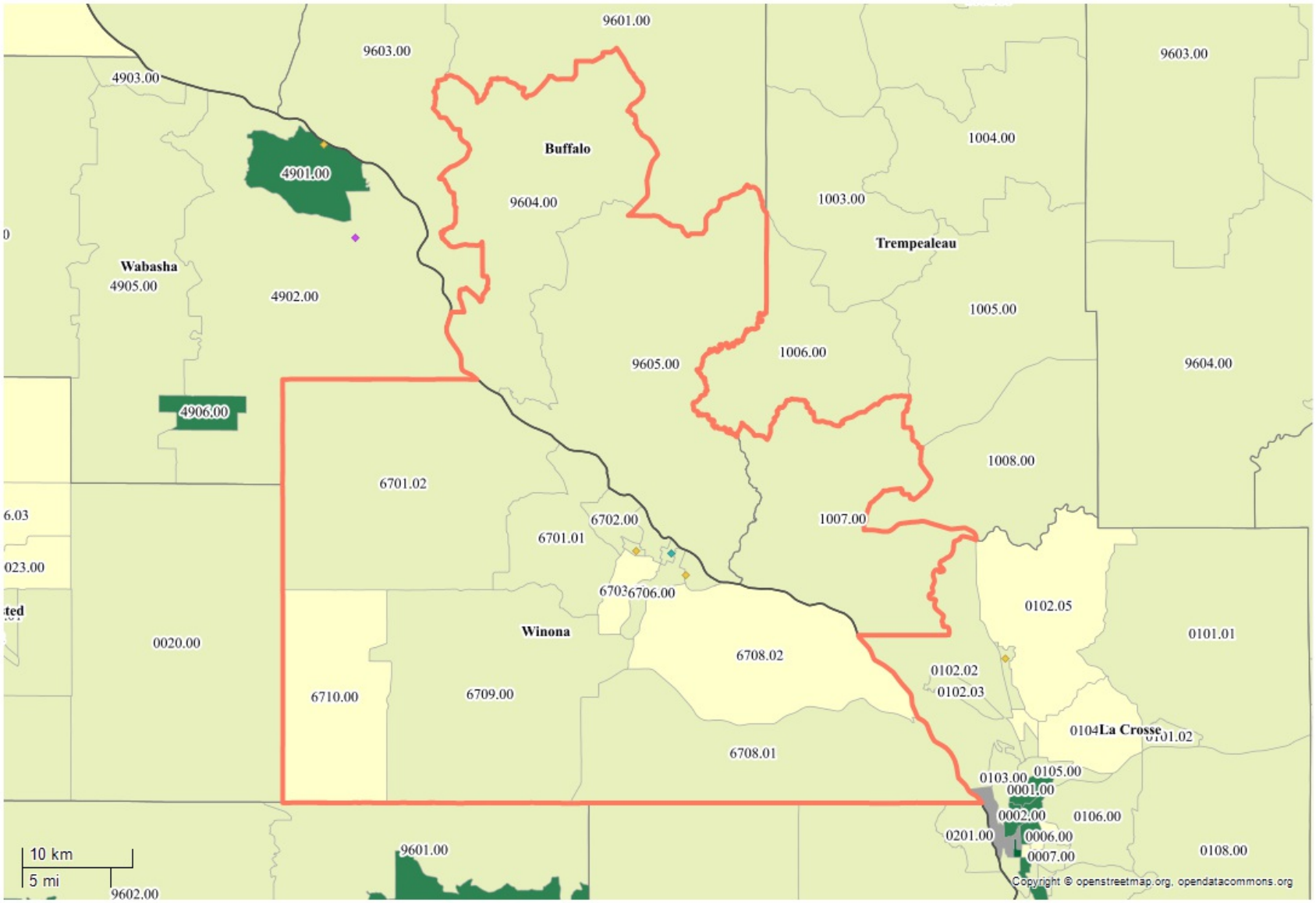
| MSA/MD Code | State | State Code | County | County Code | Census Tract # |
|---|---|---|---|---|---|
| 40340 | MN | 27 | Wabasha | 157 | 4901.00 |
| | | | | | 4902.00 |
| | | | | | 4903.00 |
| | | | | | 4904.00 |
| | | | | | 4905.00 |
| | | | | | 4906.00 |
| | | | | | 0109.00 |
| | | | | | 0110.01 |
| | | | | | 0110.02 |
| | | | | | 0111.00 |
| | | | | | 0112.00 |

# HOLMEN MARKET

| MSA/MD Code | State | State Code | County | County Code | Census Tract # |
|---|---|---|---|---|---|
| 29100 | WI | 55 | La Crosse | 063 | 0001.00 |
| | | | | | 0002.00 |
| | | | | | 0003.00 |
| | | | | | 0004.01 |
| | | | | | 0004.02 |
| | | | | | 0005.00 |
| | | | | | 0006.00 |
| | | | | | 0007.00 |
| | | | | | 0008.00 |
| | | | | | 0009.00 |
| | | | | | 0010.00 |
| | | | | | 0011.01 |
| | | | | | 0011.02 |
| | | | | | 0012.00 |
| | | | | | 0101.01 |
| | | | | | 0101.02 |
| | | | | | 0102.02 |
| | | | | | 0102.03 |
| | | | | | 0102.04 |
| | | | | | 0102.05 |
| | | | | | 0103.00 |
| | | | | | 0104.01 |
| | | | | | 0104.03 |
| | | | | | 0104.04 |
| | | | | | 0105.00 |
| | | | | | 0106.00 |
| | | | | | 0107.00 |
| | | | | | 0108.00 |

## WNB Financial, N.A.

**WINONA MARKET**




State
County
Census Tract
Zip Code
Assessment Area

Branch
Limited Service Branch
Main Office
Cash Dispenser
Deposit ATM or ITM
Other

**Income Level**

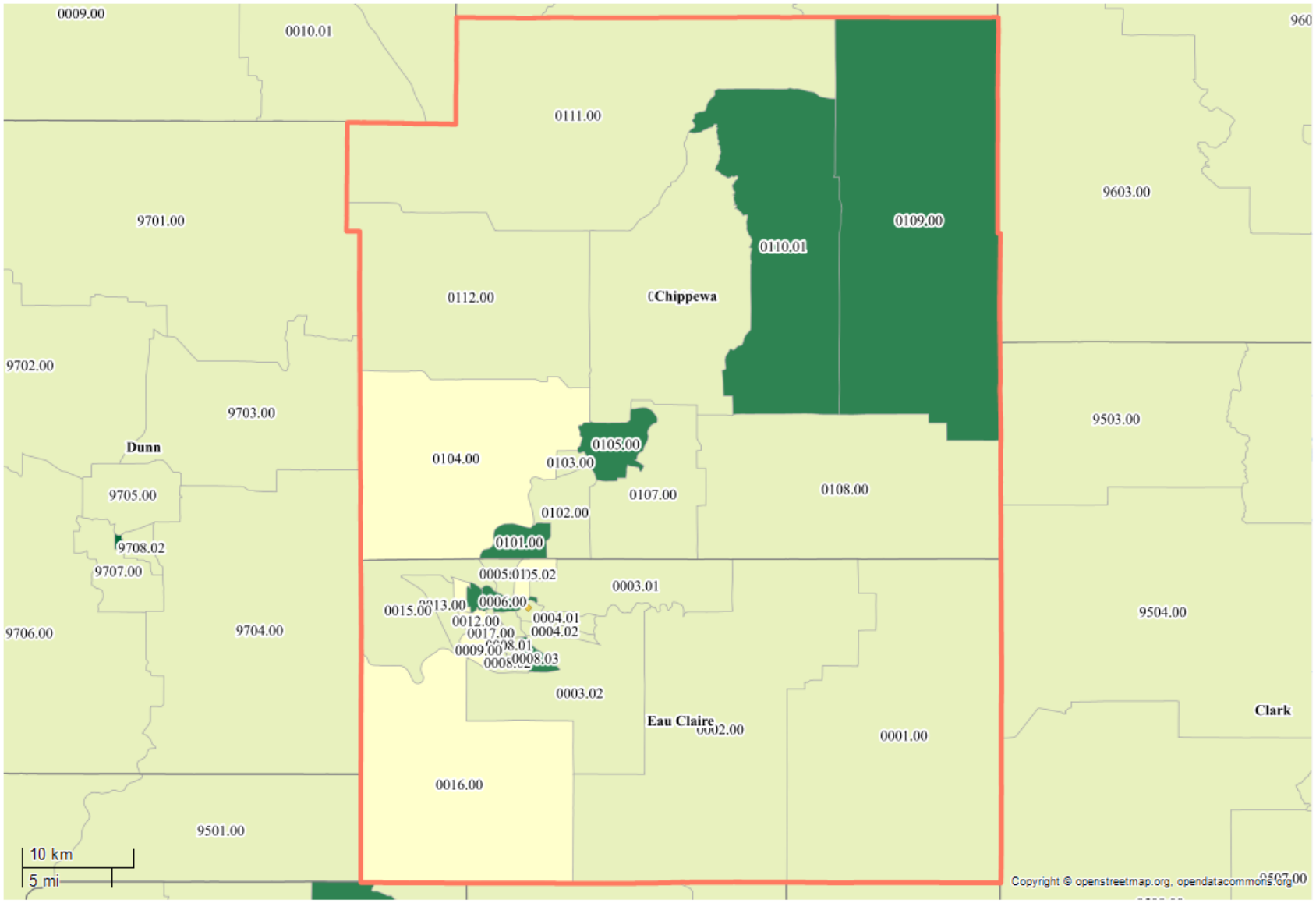
Low
Moderate
Middle
Upper
N/A

## Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/4/2021 - 12/28/2023)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (AA 1 - Winona & parts of Buffalo & Trempealeau Counties)

## WNB Financial, N.A.

**EAU CLAIRE MARKET**




State
County
Census Tract
Zip Code
Assessment Area

Branch
Limited Service Branch
Main Office
Cash Dispenser
Deposit ATMor ITM
Other

**Income Level**

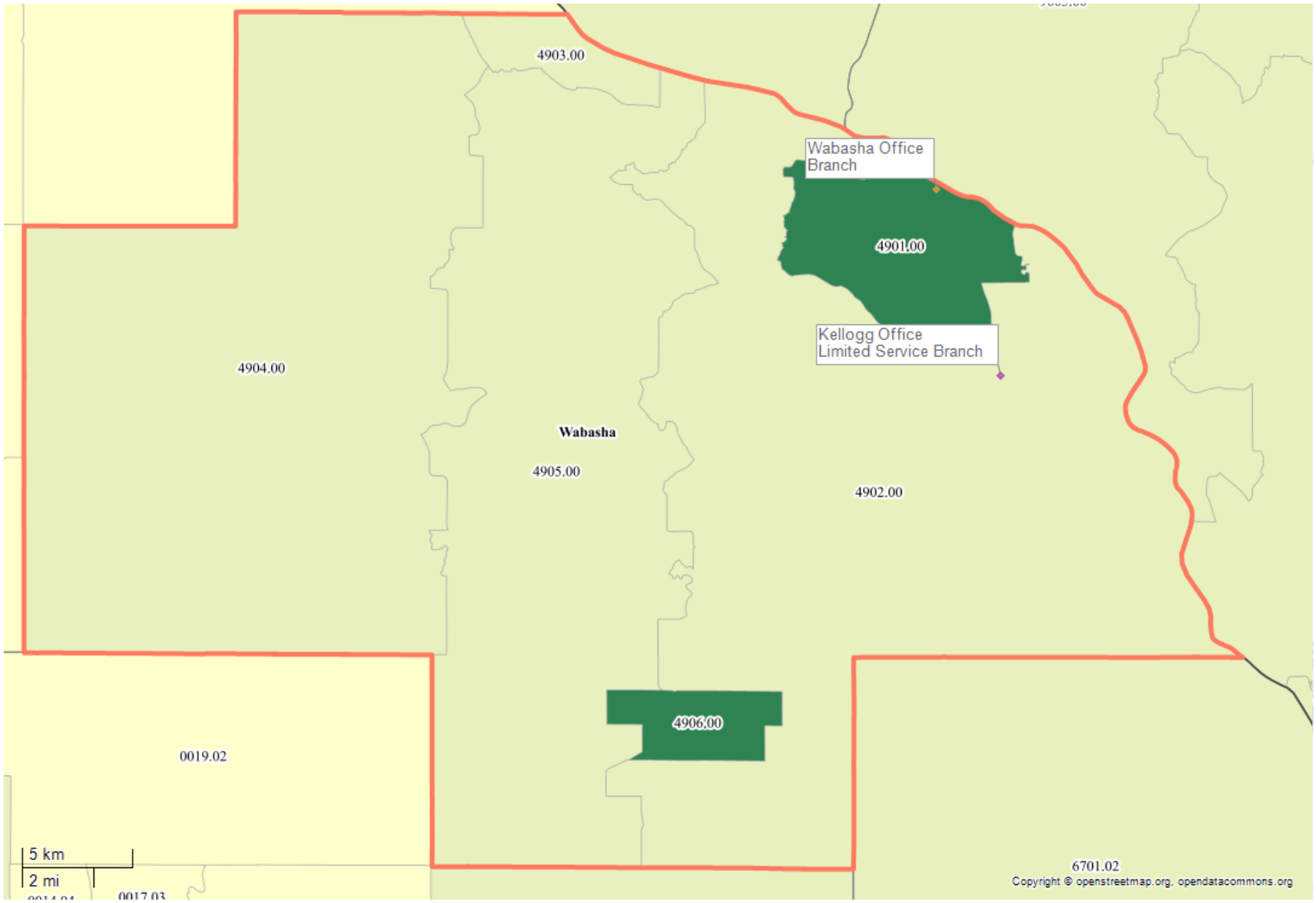
Low
Moderate
Middle
Upper
N/A

## Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/4/2021 - 12/28/2023)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (AA 2 - Eau Claire MSA)

## WNB Financial, N.A.

**WABASHA MARKET**

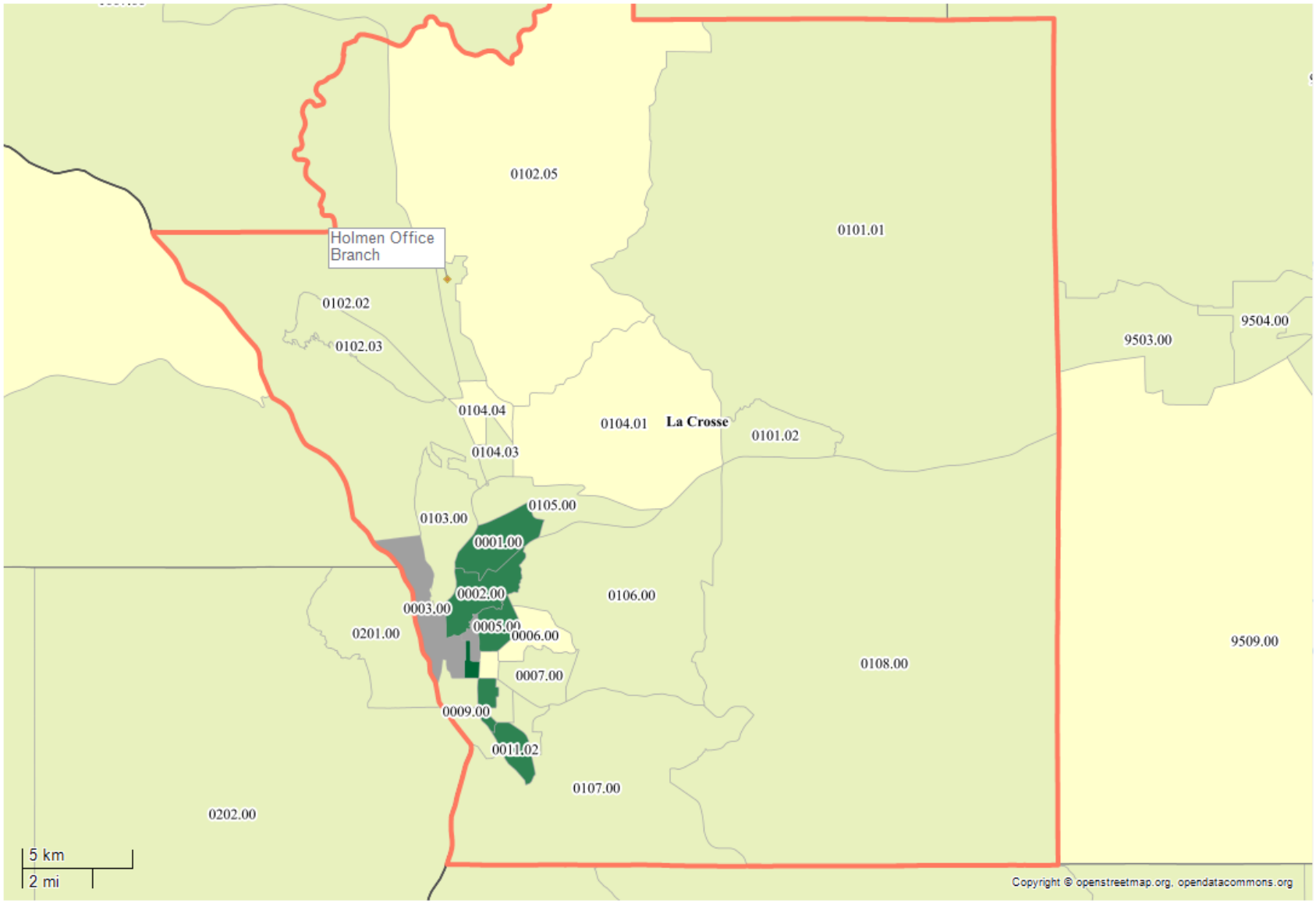



## Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/4/2021 - 12/28/2023)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (AA 3 - Wabasha (Rochester MSA))

## WNB Financial, N.A.

**HOLMEN MARKET**




State
County
Census Tract
Zip Code
Assessment Area

Branch
Limited Service Branch
Main Office
Cash Dispenser
Deposit ATMor ITM
Other

**Income Level**
Low
Moderate
Middle
Upper
N/A

## Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/4/2021 - 12/28/2023)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (AA 4 - Holmen (La Crosse-Onalaska, MN-WI MSA))

WNB FINANCIAL
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# Bank Branch Locations and Hours

As of August 3, 2026

## Downtown Winona

204 Main Street
Winona, MN 55987
(507)454-4320
MSA: N/A
Census Tract: 6705
Winona County, MN

### Lobby Hours

Monday – Friday: 9:00 a.m. – 5:00 p.m.

### Drive Up Hours

Monday – Friday: 8:00 a.m. – 5:30 p.m.
Saturday: 9:00 a.m. – 12:00 p.m.

## Winona – West Office

1491 W. Broadway
Winona, MN 55987
(507)454-5500
MSA: N/A
Census Tract: 6703
Winona County, MN

### Lobby Hours

Monday – Friday: 9:00 a.m. – 5:00 p.m.

### Drive Up Hours

Monday – Friday: 8:00 a.m. – 5:30 p.m.
Saturday: 9:00 a.m. – 12:00 p.m.

## Winona – East Office

840 Mankato Ave.
Winona, MN 55987
(507)454-5501
MSA: N/A
Census Tract: 6707
Winona County, MN

### Lobby Hours

Monday – Friday: 9:00 a.m. – 5:00 p.m.
Saturday: 9:00 a.m. - 12:00 p.m.

### Drive Up Hours

Monday – Friday: 8:00 a.m. – 5:30 p.m.
Saturday: 9:00 a.m. – 12:00 p.m.

## Wabasha

111 Main Street West
Wabasha, MN 55981
(651)565-3331
MSA: 40340
Census Tract: 4901
Wabasha County, MN

### Lobby Hours

Monday – Friday: 9:00 a.m. – 5:00 p.m.

### Drive Up Hours

Monday – Thursday: 7:30 a.m. – 5:00 p.m.
Friday: 7:30 a.m. – 5:30 p.m.
Saturday: 9:00 a.m. – 12:00 p.m.

## Kellogg

350 E Belvidere Ave
Kellogg, MN 55945
(651)565-3331
MSA: 40340
Census Tract: 4902
Wabasha County, MN

### Drive Up Hours

Monday – Friday: 9:00 a.m. – 12:00 p.m.

## Altoona

1160 Blazing Star Blvd
Altoona, WI 54720
(715)598-1529
MSA: 20740
Census Tract: 0004
Eau Claire County, WI

### Lobby Hours

Monday – Friday: 9:00 a.m. – 5:00 p.m.

### Drive Up Hours

Monday – Friday: 8:00 a.m. – 5:00 p.m.

## Holmen

1506 Cole Court
Holmen, WI 54636
(608)399-3234
MSA: 29100
Census Tract: 0102.02
La Crosse County, WI

### Lobby Hours

Monday – Friday: 9:00 a.m. – 5:00 p.m.

### Drive Up Hours

Monday – Friday: 8:00 a.m. – 5:00 p.m.

WNB FINANCIAL
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# Bank ATM Locations

***Winona, MN***

1491 West Broadway

204 Main Street

840 Mankato Avenue

Midtown Foods (126 East 5th Street)

***Wabasha, MN***

111 Main Street West

Wabasha Grocery (221 Hiawatha Drive West)

***Altoona, WI***

1160 Blazing Star Boulevard

***Holmen, WI***

1506 Cole Court

**General Information**

(507)454-8800

(800)546-4392

**Infoline (24/7)**

(507)454-9202

(800)895-0290

# CRA Public File – Branch and Assessment Area Activity

**Branch Locations Opened in the Previous Two Years**

WNB Financial did not open any new branch locations during the previous two years.

**Branch Locations Closed in the Previous Two Years**

WNB Financial did not close any branch locations during the previous two years.

**Assessment Area**

WNB Financial's assessment area has not changed during the previous two years.

Information current as of April 1, 2026.

## IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS

**from**

**WNB Financial, N.A.**
**204 Main Street**
**Winona, MN 55987**
**(507)454-4320**

### COMMON FEATURES

**Limits and fees** - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

| | |
|---|---|
| Effective Date: 06/08/2026 | |
| Account Research/Reconciliation per Hour ($25 Minimum Charge) | $25.00 |
| ACH Origination Setup/Modification Fee | $10.00 |
| ATM/Debit Card Replacement | $5.00 |
| Bank Bag | $2.00 |
| Business Digital Banking | |
| - Cash Management Monthly Fee | $10.00 |
| - Cash Management Domestic Wire Origination | $20.00 |
| - Cash Management International Wire Origination | $40.00 |
| Business Automatic Sweep Fee | $5.00 |
| Chargeback Fee per Presentment (deposited item returned) | $5.00 |
| Close Account Within 6 Months (Checking/Savings) | $25.00 |
| Copies | $0.25 |
| Debit Card Transaction Limits | |
| $2500 Point of Sale (POS)<br>$510 at ATM | |
| Debit Card International Transactions | |
| 1% per transaction fee imposed by VISA regardless of currency conversion. | |
| Dormant Account Fee per Month ** | $5.00 |
| For balances under $50.00 after 24 months of inactivity | |
| Duplicate Statement | $5.00 |
| International Check in Collection | $10.00 |
| Returned Foreign Check Handling Fee | $18.00 |
| Levy, Garnishment, Legal Process | $100.00 |
| Night Deposit Service (includes 2 lockable bank bags and keys) | $0.00 |
| - Additional Lockable Bank Bag | $25.00 |
| - Additional Bank Bag Key | $10.00 |
| Overdraft Line of Credit Fee | $35.00 |
| Overdraft Fee per Presentment* | |
| - Paid Item Fee* | $31.00 |
| - Returned Item Fee* | $29.00 |
| - Continuing Overdraft Fee* (beginning on 3rd business day overdrawn) | $3.00 per day |


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| | |
|---|---|
| Signature Guarantee | $25.00 |
| Stop Payment | $10.00 |
| Escheatment Fee | $15.00 |
| Wire Transfers (Incoming) | $10.00 |
| Wire Transfers (Outgoing Domestic) | $25.00 |
| Wire Transfers (Outgoing International) | $50.00 |
| Zero Balance Sweep per month | $15.00 |

Fees are subject to change.

* An overdraft fee applies to overdrafts created by check, in-person withdrawal, ATM withdrawal, or other electronic means. Maximum daily overdraft fee limit of $248.00, including all combined Overdraft Fees per Presentment, Paid Item Fees, and Returned Item Fees. The same item can be presented more than once. Overdraft fees do not apply to other accounts identified in Truth in Savings disclosures or elsewhere where you specify you want all insufficient items returned to the extent operationally possible.

**Dormant Fees do not apply to Health Savings Accounts (HSAs)


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# Loan to Deposit Ratio History

| | |
|---|---|
| 1st Quarter 2025 | 69.49% |
| 2nd Quarter 2025 | 70.72% |
| 3rd Quarter 2025 | 71.82% |
| 4th Quarter 2025 | 67.49% |

| | |
|---|---|
| 1st Quarter 2024 | 73.51% |
| 2nd Quarter 2024 | 73.00% |
| 3rd Quarter 2024 | 71.38% |
| 4th Quarter 2024 | 68.86% |




# WNB Financial, N.A.

## Products and Services

We compete in the financial services industry. For WNB Financial, the key word is "service".

Our competitors have similar products to ours, and we can accordingly price our products and services on a competitive scale. But competition on price alone is a zero-sum game where competitors that only strive to offer the lowest price ultimately fail.

At WNB Financial, we succeed to the extent that we give value to our customers through our products *and* services. To give valuable service, a solid understanding of our products is crucial.

"Service" is not merely reciting a product's features; valuable service comes from showing the customer how these products can meet their needs.




## Checking Accounts

- Free Checking
- Direct Interest Checking
- 50+ Checking
- Advantage Interest Checking
- Private Reserve Checking

## Savings Accounts

- Personal Savings
- Money Fund
- Health Savings Account (HSA)
- Private Reserve Money Market

## Time Deposits

- 12 Months
- 24 Months
- 36 Months

## IRAs

- Traditional IRA
- Roth IRA

## Electronic Banking

- ATM Cards
- Visa Debit Cards
- InfoLine (telephone banking)
- Wire Transfers
- Direct Deposit
- Automatic Payment (Automated Clearing House)
- Internet Banking
- Bill Payer
- Electronic Statement

- Mobile Banking
- Remote Deposit Anywhere

## Other Deposit Services

- Safe Deposit Boxes
- Savings Bond Redemption
- FDIC Insurance
- Automatic Transfers (sweep accounts)
- Cashier's Checks
- Money Orders
- Notary Services
- Signature Guarantees

## Loans

- Overdraft Line of Credit
- Personal Loans
- Home Mortgage Loans
- Home Equity Loans and Lines of Credit
- Jr. (2nd) Mortgage

## Other Consumer Lending Options

- Automatic Loan Payment
- Automatic Payment from other institutions
- Credit Cards Through Elan Financial

## Private Banking

- Lending
    - Private Reserve Line Of Credit

## Business Banking

- Checking
    - Free Business Checking
    - Business Interest Checking
    - Commercial Checking
- Savings
    - Business Savings
    - Business Money Fund
- Lending

## Additional Business Banking Services

- Internet Banking
- Cash Management
- Insured Cash Sweep Accounts
- Remote Deposit Capture
- Credit Card Processing Through First Data
- Credit Cards Through Elan Financial
- Account Reconciliation Positive Pay

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# WNB Financial, N.A.

## Trust Department Services and Products

## As of April 1, 2026

- **Trust Services for:**
  - Revocable Trusts
  - Irrevocable Trust
  - Qualified Retirement Plans
  - Non-qualified Deferred Compensation Plans
  - IRA
  - Special Needs Trust
- **Investment Management Services for:**
  - Agency Accounts
  - Qualified Retirement Plans
  - Non-qualified Deferred Compensation Plans
  - Foundations
  - Endowments
- **Custodial Services for:**
  - IRA
  - Foundations
  - Endowments
  - Agency Accounts
- **Estate Settlement Services**
- **Comprehensive Financial Planning**
- **Business Succession Planning**
- **Signature Guarantee Services**




# Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.

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