



PUBLIC DISCLOSURE

December 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Tri City National Bank
Charter Number: 15738

6400 South 27th Street
Oak Creek, WI 53154

Office of the Comptroller of the Currency

1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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

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Overall CRA Rating

Bank’s CRA Rating: This bank is rated **Satisfactory**.

The following table indicates the performance level of **Tri City National Bank (TCNB or bank)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Tri City National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the bank’s lending levels in the state of Wisconsin, which reflected excellent responsiveness to the credit needs within the bank’s assessment areas (AAs).
- The Investment Test rating is based on the bank’s adequate level of qualified community development investments and good responsiveness to community needs during the evaluation period.
- The Service Test rating is based on the bank’s service delivery systems, which were accessible to geographies and individuals of different levels throughout the bank’s AAs. The bank’s employees provided a relatively high level of Community Development (CD) services.

Lending in Assessment Area

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

The bank originated and purchased 91.4 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,710	91.9	151	8.1	1,861	460,101	89.7	52,970	10.3	513,071
Small Business	846	90.5	89	9.5	935	198,948	85.0	34,996	15.0	233,944
Small Farm	0	0.0	1	100.0	1	0	0.0	206	100.0	206
Total	2,556	91.4	241	8.6	2,797	659,049	88.2	88,172	11.8	747,221

The bank originated or purchased enough home mortgage and small business loans to include in the geographic distribution by income level analysis. The number of small farm and consumer loans was too low to sufficiently analyze.

Description of Institution

TCNB is a nationally chartered intrastate bank that is headquartered in Oak Creek, Wisconsin. As of December 31, 2023, TCNB has 28 branch locations and 25 automated teller machines (ATMs) within its branch network. There are nine branches within moderate income census tracts (CTs), equating to 32.1 percent of total branches. TCNB is the wholly owned subsidiary of Tri City Bankshares Corporation. The bank has seven wholly owned subsidiaries: Tri City Capital Corporation; Title Services of Southeast Wisconsin; TCNB Whole Health Investment Fund LLC; TCNB Aurora Investment Fund LLC; FIRE Loan Pool IF LLC; TNCB FCI Loan Pool Investment Fund LLC; and TCNB Notre Dame IF, LLC. The latter five subsidiaries are economic development entities established for public welfare investments utilizing New Markets Tax Credits.

TCNB is focused on meeting the banking and credit needs within its market area through its offering of traditional lending and deposit products to both individual and business customers. The bank offers loan products via several lending programs including the U.S. Department of Veterans Affairs, the Small Business Administration, and the Wisconsin Housing and Economic Development Authority (WHEDA). As of December 31, 2023, TCNB had total assets of \$2.08 billion, net loans and leases of \$1.2 billion, and tier 1 capital of nearly \$205.5 million.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. TCNB received an Outstanding rating in its Large Bank CRA performance evaluation dated January 3, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

TCNB was evaluated using the Large Bank CRA procedures to assess the bank's record of meeting the credit needs of its community. Large Bank procedures include three performance tests: a Lending Test, an Investment Test and a Service Test. The evaluation period for this examination is January 1, 2021, through December 31, 2023. We used this period to conduct analysis, evaluate all products and services, and form conclusions for all performance tests for this examination. The bank's home mortgage loans, loans to small businesses, CD loans, qualified CD investments, and CD and retail services were included in this evaluation.

To be considered a primary product for evaluation, the bank must have originated at least 20 loans in the bank's AA during the evaluation period. For the Home Mortgage Disclosure Act (HMDA) analysis and conclusions for lending activity, geographical distribution, and borrower distribution, the bank's home purchase, home improvement, home refinance, and multifamily loans were aggregated.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

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

The OCC gave the most weight in our overall ratings to performance in the Milwaukee-Waukesha MSA. The Milwaukee-Waukesha MSA accounted for 82.2 percent of the bank's total deposits, 78.2 percent of all home mortgage loans, and 83.8 percent of all CRA small business loans within the bank's AAs throughout the evaluation period.

When determining our conclusions for the Lending Test, more weight was given to the performance of home mortgage lending as compared to CRA small business lending. We gave slightly more weight to home mortgage lending performance as it accounted for 66.9 percent of loan originations and 69.8 percent of the loan volume within the bank's rating area throughout the evaluation period.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to the credit needs within the bank's AAs.
- TCNB's lending performance, as reflected in the tables below, demonstrated an overall excellent geographic distribution and borrower penetration of home mortgage loans. The overall geographic distribution of small business loans was good, and the borrower distribution of small business loans was adequate.
- The bank is a leader in making CD loans that are responsive to community needs which had a significantly positive impact on the bank's Lending Test rating.
- The bank had an adequate level of qualified CD investments, grants, and donations. The bank exhibited good responsiveness to credit and community development needs during the evaluation period.
- The bank's service delivery systems were accessible and did not vary in any way that inconvenienced portions of the bank's AAs, particularly low- and moderate-income (LMI) geographies.
- The bank's employees provided a high level of CD services which were responsive to community needs.

Description of Institution's Operations in Wisconsin

TCNB has designated three AAs within the state of Wisconsin. The Milwaukee-Waukesha-West Allis, WI MSA (Milwaukee-Waukesha MSA) consists of Milwaukee and Waukesha counties. The Lake County-Kenosha County, Illinois-Wisconsin metropolitan division (Kenosha MD) consists of portions of Kenosha County. The Racine, WI MSA consists of Racine County. All of the bank's AAs meet the requirements of CRA regulations and do not arbitrarily exclude LMI tracts.

Based on FDIC deposit market share data as of June 30, 2023, the bank had nearly \$1.7 billion in deposits representing a 0.9 percent deposit market share and ranked 16 of 197 depository institution in the state of Wisconsin.

Milwaukee-Waukesha MSA

The bank's AA in the Milwaukee-Waukesha MSA consists of Milwaukee and Waukesha counties. Refer to appendix A for the list of counties reviewed. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, the AA contained 384 CTs, of which 99 were low-income CTs, 68 were moderate-income CTs, 111 were middle-income CTs, 104 were upper-income CTs, and two CTs had no income designation. Beginning in 2022, the 2020 ACS data reflected a total of 400 CTs within the AA, of which 81 are designated as low-income CTs, 79 moderate-income CTs, 121 middle-income CTs, 110 upper-income CTs, and nine CTs had no income designation.

As of the 2020 U.S. Census, the MSA had a population of 1,364,467, of which 15.0 percent represented low-income individuals and 18.2 percent moderate-income individuals. The 2020 U.S. Census population decreased slightly, by .25 percent when compared to the 2015 ACS.

As of June 30, 2023, the bank had \$1.4 billion in deposits in the MSA, representing 82.2 percent of the bank's total deposits. During the evaluation period, the bank originated \$526.4 million or 79.9 percent of its total dollar volume of HMDA and CRA small business loans within the AA.

The bank operates 23 full-service branches and 21 deposit taking ATMs within this AA. According to the June 30, 2023, FDIC deposit-market share report, there were 40 FDIC-insured institutions operating 364 branches in the AA. The bank ranked eighth in deposit market share with 1.9 percent. The five top competitors for deposits include U.S. Bank, BMO Harris Bank, JPMorgan Chase Bank, Associated Bank, and Town Bank, which hold a combined 75.7 percent market share.

Significant competition for loans exists in the AA. Based on 2023 aggregate mortgage loan data, 459 lending institutions reported originating or purchasing home mortgage loans. TCNB ranked 19th with 1.2 percent market share. According to 2022 peer small business data, 131 lending institutions reported originating or purchasing small business loans. The bank ranked 16th with 0.8 percent market share.

Most non-farm businesses in the AA are small, as measured by the number of employees and gross revenues. According to 2023 Dun & Bradstreet data, 80.6 percent of businesses located in the AA have less than \$1.0 million in gross annual revenue.

According to Moody's Analytics, the Milwaukee-Waukesha MSA economy is trailing other large midwestern metro areas. Total employment has lagged both employment at the state and national level. Manufacturing and healthcare have been among the top-performing industries. The unemployment rate has trended down as labor force declines have outpaced job losses. Yearly house price appreciation is lower than the state and the nation. Area strengths included a highly productive manufacturing sector, above-average per capita income, and well-educated workforce. Economic challenges include net negative migration long term and above-average exposure to interest rates through manufacturing. Aurora Health Care Inc. is the primary employer in the MSA. Other top employers include Froedtert Health, Ascension Wisconsin, Quad Graphics Inc., Medical College of Wisconsin, and Kohl's.

Employment levels in the MSA improved from 2021 through 2023. According to the U.S. Bureau of Labor Statistics (BLS), the unemployment rate in the MSA was 5.6 percent in January 2021, which was higher than the state of Wisconsin unemployment of 5.1 percent. By December 2023, the unemployment rate dropped to 3.0 percent, slightly higher than the state unemployment rate of 2.9 percent.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with incomes above the poverty level. According to the 2020 U.S. Census, 9.9 percent of families in the Milwaukee-Waukesha MSA had incomes below the federal poverty line. The median housing value of owner-occupied housing units for the AA was \$179,269 in 2021 and \$200,665 in 2022-2023, reflecting an 11.9 percent increase in values. According to the 2015 ACS demographic data, the number of housing units in the MSA was 579,579. Owner-occupied housing units and rental units represented 53.3 percent and 39.3 percent of total housing units, respectively, and 7.4 percent of housing units were vacant. Per the 2020 U.S. Census demographic data, the number of housing units grew by 1.1 percent to 586,013. Owner-occupied housing units and rental units represented 52.9 percent and 39.8 percent of total housing units, respectively, and 7.3 percent of units are vacant.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the below tables, low-income families earned less than \$3,535 per month, and moderate-income families earned less than \$5,655 a month in 2022-2023. The maximum low-income and maximum moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the 2021 through 2023 evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,060 for a low-income borrower and \$1,697 for a moderate-income borrower. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home within the AA using the median housing value would be \$1,335 in 2022-2023. Based on these calculations, low-income borrowers and some moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

We utilized two community contacts in this AA, including a local nonprofit organization that provides home counseling services to LMI homebuyers and a local government agency that serves as a resource for economic development, land use, and protection of local natural resources. Both organizations stated there is an affordable housing shortage. There are also needs for workforce re-training and improved access to small dollar loan products. Banks are sufficiently involved in the community and provide access to capital for small businesses and startups.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Milwaukee-Waukesha MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	384	25.8	17.7	28.9	27.1	0.5
Population by Geography	1,349,812	19.4	17.3	29.7	33.6	0.0
Housing Units by Geography	579,579	18.6	17.5	31.5	32.3	0.0
Owner-Occupied Units by Geography	308,791	8.9	14.5	32.0	44.5	0.0
Occupied Rental Units by Geography	227,915	27.8	21.7	32.7	17.7	0.0
Vacant Units by Geography	42,873	39.6	16.9	21.2	22.3	0.0
Businesses by Geography	79,737	13.7	14.2	31.3	40.8	0.1
Farms by Geography	1,496	9.2	10.7	28.5	51.6	0.0
Family Distribution by Income Level	325,894	25.7	16.3	19.0	39.0	0.0
Household Distribution by Income Level	536,706	26.9	15.8	17.0	40.3	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$179,269
			Median Gross Rent			\$840
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Milwaukee-Waukesha MSA 2022-23						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	400	20.3	19.8	30.3	27.5	2.3
Population by Geography	1,346,467	15.0	18.2	32.0	33.6	1.2
Housing Units by Geography	586,013	14.8	18.7	33.6	31.8	1.1
Owner-Occupied Units by Geography	310,203	6.7	14.7	35.8	42.6	0.2
Occupied Rental Units by Geography	233,280	22.6	24.0	32.4	19.1	1.9
Vacant Units by Geography	42,530	30.9	19.3	24.6	22.1	3.0
Businesses by Geography	142,264	12.7	17.7	30.4	38.4	0.8
Farms by Geography	2,475	10.4	13.7	29.7	46.0	0.2
Family Distribution by Income Level	322,061	24.3	17.0	19.9	38.7	0.0
Household Distribution by Income Level	543,483	26.5	16.0	17.3	40.2	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$84,829	Median Housing Value			\$200,665
			Median Gross Rent			\$948
			Families Below Poverty Level			9.9%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Racine MSA

The bank's AA within the Racine MSA consists of Racine County. Refer to Appendix A for the list of counties reviewed. The 2020 U.S. Census changes affected the AA. Based on the 2015 ACS data, in 2021, the AA contained 45 CTs and included three low-income CTs, nine moderate-income CTs, 21 middle-income CTs, nine upper-income CT, and three CTs had no income designation. As of the 2020 U.S. Census, the AA included 47 CTs of which four were low-income CTs, nine were moderate-income CTs, 16 were middle-income CTs, 16 upper-income CTs, and two CTs had no income designation.

The 2020 U.S. Census showed the AA having a population of 197,727, of which 9.1 percent represented low-income individuals and 17.9 percent were moderate-income individuals. The population increased by 1.5 percent when compared to the 2015 ACS.

As of June 30, 2023, the bank had \$271.5 million in deposits in the Racine MSA, representing 16.2 percent of the bank's total deposits. During the evaluation period, the bank made \$98.1 million of its total dollar volume of HMDA and CRA small business loan originations within the AA.

The bank operates four full-service branches and three deposit-taking ATMs within this AA. According to the June 30, 2023, FDIC deposit market share report, there were 13 FDIC-insured institutions operating 39 branches in the AA. The bank ranked fifth in deposit market share with 6.1 percent. The top five competitors for deposits include Johnson Bank, BMO Harris, Community State Bank, Town Bank N.A, and JP Morgan Chase Bank, which hold a combined 70.8 percent market share.

Based on 2023 aggregate mortgage loan data, 261 lending institutions reported originating or purchasing home mortgage loans. Tri-City ranked ninth with 2.0 percent market share. According to 2022 small business data, 87 lending institutions reported originating or purchasing small business loans. TCNB ranked 13th with 1.6 percent market share.

Most non-farm businesses in the AA are small, as measured by gross revenues. According to the 2023 Dun & Bradstreet data, 88.6 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues.

According to Moody's Analytics, Racine's economy will move sideways through the end of 2024. Total employment has expanded about the same pace as in the state, but more slowly than in the nation. Manufacturing and healthcare have been among the top-performing industries. The unemployment rate is stable near its pre-pandemic low, but other labor market indicators point to weakness. Average weekly hours are near their record low, which indicate waning labor demand. The housing market is cooling, and house prices have moved sideways over the past year. Area strengths include below-average consumer delinquency rates, high housing affordability, and low living costs. Challenges include low industrial diversity, below-average per capita income, and low quality of life and economic vitality. All Saints Health Care System is the primary employer in the MSA. Other top employers include S.C Johnson & Son Inc., CNH America LLC, and Emerson Electric.

Employment levels in the MSA improved from 2021 through 2023. According to the Bureau of Labor Statistics, the unemployment rate in the MSA was 6.2 percent in January 2021, which was higher than the state of Wisconsin unemployment of 4.7 percent. By December 2023, the unemployment rate dropped to 3.3 percent, which was slightly lower than the state unemployment rate of 3.4 percent.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and are less likely to have financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 8.6 percent of families in the Racine MSA have income below the federal poverty line.

The median housing value of owner-occupied housing units for the AA was \$161,164 in 2021 and \$182,995 in 2022-2023, reflecting a 13.5 percent increase in values. According to the 2015 ACS demographic data, the number of housing units in the MSA was 82,261. Owner-occupied housing units and rental units represented 63.8 percent and 27.5 percent of total housing units, respectively, and 8.6 percent of housing units were vacant. Per the 2020 U.S. Census demographic data, the number of housing units grew to 82,977. Owner-occupied housing units and rental units represented 63.7 percent and 29.8 percent of total housing units, respectively, and 6.4 percent of units are vacant.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the below tables, low-income families earned less than \$3,229 per month and moderate-income families earned less than \$5,167 a month in 2022-2023. The maximum low-income and maximum moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the 2021 through 2023 evaluation period, the calculated maximum affordable monthly mortgage payment was \$969 for a low-income borrower and \$1,550 for a moderate-income borrower. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowners' insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home within the AA using the median housing value would be \$1,217 in 2022-2023. Based on these calculations, low-income borrowers and some moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

We utilized one community contact in this AA, a local nonprofit organization that provides affordable housing and works to implement neighborhood revitalization efforts and secure results in areas of economic development. This organization stated there is an affordable housing shortage. There are also needs for financial literacy and access to capital for small businesses and startups.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Racine MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	6.7	20.0	46.7	20.0	6.7
Population by Geography	194,895	6.7	20.3	53.3	18.9	0.8
Housing Units by Geography	82,261	6.3	21.1	53.1	18.6	1.0
Owner-Occupied Units by Geography	52,516	2.7	16.1	57.4	23.6	0.2
Occupied Rental Units by Geography	22,667	12.0	29.9	47.2	8.5	2.4
Vacant Units by Geography	7,078	14.3	29.5	39.9	13.9	2.5
Businesses by Geography	9,954	5.3	18.9	53.6	19.3	2.9
Farms by Geography	428	1.9	7.0	54.4	36.7	0.0
Family Distribution by Income Level	50,245	20.0	17.8	21.9	40.3	0.0
Household Distribution by Income Level	75,183	23.4	15.6	19.5	41.4	0.0
Median Family Income MSA - 39540 Racine, WI MSA		\$68,728	Median Housing Value			\$161,164
			Median Gross Rent			\$795
			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Racine MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	8.5	19.1	34.0	34.0	4.3
Population by Geography	197,727	9.1	17.9	36.9	35.7	0.5
Housing Units by Geography	82,977	10.2	18.2	37.1	34.4	0.0
Owner-Occupied Units by Geography	52,896	4.2	15.0	38.1	42.7	0.0
Occupied Rental Units by Geography	24,752	20.7	24.4	35.6	19.3	0.0
Vacant Units by Geography	5,329	21.3	21.0	34.6	22.9	0.2
Businesses by Geography	16,248	10.8	15.5	36.3	37.3	0.1
Farms by Geography	640	3.9	7.5	30.3	58.1	0.2
Family Distribution by Income Level	51,478	21.0	18.3	20.1	40.5	0.0
Household Distribution by Income Level	77,648	24.0	16.0	18.2	41.7	0.0
Median Family Income MSA - 39540 Racine, WI MSA		\$77,503	Median Housing Value			\$182,995
			Median Gross Rent			\$886
			Families Below Poverty Level			8.6%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Wisconsin

For the state of Wisconsin, we completed full-scope reviews of the Milwaukee-Waukesha and Racine MSAs and completed a limited-scope review of the Kenosha MD.

When determining our conclusions for lending activity, geographic distribution of loans, and borrower distribution of loans, we gave more weight to home mortgage lending conclusions in the Milwaukee-Waukesha MSA when determining the Lending Test rating as it accounted for 78.2 percent of the bank's home mortgage lending. We gave more weight to the bank's home mortgage lending performance overall as it makes up 69.8 percent of the total home mortgage and small business originations during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee-Waukesha MSA and Racine MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Kenosha MD	57	34	0	91	3.5	1.6
Milwaukee-Waukesha MSA	1,261	658	17	1,936	75.2	82.2
Racine MSA	392	154	2	548	21.3	16.2

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

Dollar Volume of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State* Loans	% State Deposits
Kenosha MD	\$29,024,161	\$5,475,000	\$0	\$34,499,161	4.9	1.6
Milwaukee-Waukesha MSA	\$359,721,788	\$166,714,000	\$41,031,146	\$567,466,934	80.9	82.4
Racine MSA	\$71,355,283	\$26,759,000	\$1,425,000	\$99,539,283	14.2	16.2

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

Milwaukee-Waukesha MSA

Lending levels reflected good responsiveness to AA credit needs.

According to June 30, 2023, FDIC Summary of Deposit reporting, the bank had nearly \$1.4 billion in deposits in the Milwaukee MSA. The bank's deposits totaled a 1.9 percent deposit market share in the AA. The bank's deposit market share ranked eighth out of 45 deposit taking institutions. The bank's deposit market share ranked in the top 20.0 percent of all deposit taking institutions in the AA.

According to 2023 peer mortgage data, the bank originated 356 home mortgage loans in the Milwaukee-Waukesha MSA in 2023. The bank's home mortgage lending accounted for a 1.2 percent market share of home mortgage loan originations in the AA. The bank's market share of home mortgage loan originations was below its deposit market share. The bank's market share of home mortgage loan originations ranked 19th out of 459 home mortgage lenders in the AA. The bank's market share ranking of home mortgage loans originations ranked in the top 4.1 percent of home mortgage lenders in the AA. The bank's market share ranking of home mortgage loan originations relative to all lenders was stronger than its deposit market share ranking relative to all deposit taking institutions.

According to 2022 peer small business data, the bank originated 229 small business loans in the Milwaukee-Waukesha MSA in 2022. The bank's small business loan originations accounted for a 0.8 percent market share of small business loan originations in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share ranked 16th out of 131 small business lenders in the AA. The bank small business loan originations ranked in the top 12.2 percent of all small business lenders in the AA. The bank's market share ranking of small business loan originations relative to all lenders was stronger than its deposit market share ranking relative to all deposit taking institutions.

Racine MSA

Lending levels reflected good responsiveness to AA credit needs.

According to June 30, 2023, FDIC Summary of Deposit report, the bank had \$271.5 million in deposits in the Racine MSA. The bank's deposits totaled a 6.1 percent deposit market share. The bank's deposits ranked fifth out of 13 deposit taking institutions in the AA. The bank's deposit market share ranked in the top 38.5 percent of all deposit taking institutions in the AA.

According to 2023 peer mortgage data, the bank made 105 home mortgage loan originations. The bank had a 2.0 percent market share of home mortgage originations. The bank's market share of home mortgage loan originations was well below its deposit market share. The bank's market share of home mortgage loan originations ranked ninth out of 261 home mortgage lenders in the AA. The bank's market share of home mortgage loan originations ranked in the top 3.4 percent of all lenders in the AA. The bank's market share ranking of home mortgage loan originations relative to all lenders was stronger than its deposit share ranking relative to all deposit taking institutions.

According to 2022 peer small business data, the bank made 54 small business loans in the Racine MSA. The bank had a 1.6 percent market share of small business loan originations. The bank's market share of small business loan originations was well below its deposit market share. The bank's market share of small business loan originations ranked 13th out of 87 small business lenders in the AA. The bank's

market share of small business loan originations ranked in the top 14.9 percent of all small business lenders in the AA. The bank's market share ranking of small business loan originations relative to all lenders was stronger than its deposit market share ranking relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Milwaukee-Waukesha MSA

The geographic distribution of home mortgage loans for owner occupied housing was good. In 2022-2023, the proportion of bank home mortgage loans within low-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans in those geographies. The proportion of bank home mortgage loans within moderate-income CTs exceeded both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans in those geographies. Performance in 2021 was stronger than performance in 2022-2023. Stronger performance was due to excellent geographical distribution of home mortgage loans in low-income geographies compared to the aggregate industry distribution in those geographies.

Racine MSA

The geographic distribution of home mortgage loans for owner occupied housing was excellent. In 2022-2023, the proportion of bank home mortgage loans within LMI CTs exceeded both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans in those geographies. Performance in 2021 was consistent with performance 2022-2023.

Small Loans to Businesses

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

Milwaukee-Waukesha MSA

The geographic distribution of small loans to businesses was excellent. The proportion of bank small business loans in low-income CTs was near to the percentage of businesses and exceeded the aggregate industry distribution of loans to those businesses. The proportion of bank small business loans in moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans in those geographies. Performance in 2021 was consistent with performance in 2022-2023.

Racine MSA

The geographic distribution of small loans to businesses was good. In 2022-2023, the proportion of bank small business loans in low-income CTs substantially met the percentage of businesses and exceeded the

aggregate industry distribution of loans to those businesses. The proportion of bank small business loans in moderate-income CTs was well below the percentage of businesses and below the aggregate industry distribution of loans in those geographies. Performance in 2021 was weaker than performance in 2022 through 2023. Weaker performance was due to a smaller percentage of loans in LMI geographies as compared to the demographics and aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AAs to determine if any unexplained, conspicuous gaps existed. We reviewed summery reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Milwaukee-Waukesha MSA

The borrower distribution of home mortgage loans was excellent. In 2022-2023, the proportion of bank home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of bank home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans for those borrowers. Performance in 2021 was consistent with performance in 2022-2023.

Racine MSA

The borrower distribution of home mortgage loans was excellent. The proportion of bank home mortgage loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of bank home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans for those borrowers. Performance in 2021 was consistent with performance in 2022-2023.

Small Loans to Businesses

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

Milwaukee-Waukesha MSA

The borrower distribution of loans to small businesses was good. The bank's performance in 2022-2023 was well below the percentage of businesses with revenues less than \$1.0 million and below the aggregate industry distribution of loans to those businesses. Performance in 2021 was stronger than performance in 2022-2023. Stronger performance was due to a higher percentage of loans compared to the aggregate.

Racine MSA

The borrower distribution of loans to small businesses was adequate. The proportion of the bank's small business loans was significantly below the percentage of businesses with revenues less than \$1.0 million and below the aggregate industry distribution of loans to those businesses. Bank performance in 2021 was slightly stronger than performance in 2022-2023. Stronger performance was due to a higher percentage of loans as compared to the demographic and aggregate comparisons.

Community Development Lending

The institution was a leader in making CD loans that are responsive to community needs. This performance had a significant positive impact on the Lending Test.

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

Milwaukee-Waukesha MSA

The bank was a leader in making CD loans. Throughout the evaluation period, the bank made 17 CD loans totaling \$41.0 million or 24.3 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs and supported affordable housing, economic development, revitalization/stabilization of LMI areas, and services targeted to LMI individuals and communities. By dollar volume, 38.6 percent of the CD lending in the AA supported affordable housing; 32.3 percent was directed towards community services; and 28.5 percent funded revitalization efforts.

Examples of CD loans in the Milwaukee-Waukesha MSA include:

- The bank originated eight loans, totaling \$15.8 million to purchase, refinance or maintain affordable housing properties across the AA that resulted in over 350 affordable units.
- The bank originated a \$6.0 million loan to construct a new charter school campus located in a low-income CT.

Racine MSA

The bank had an adequate level of CD loans. Throughout the evaluation period, TCNB made two CD loan totaling \$1.4 million that primarily supported affordable housing.

An example of CD loans in the Racine MSA include:

- The bank originated a loan that provides 26 affordable housing units through a land restricted agreement (LURA) which continues through December 2023.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. TCNB supported affordable housing through products which offer flexibility for borrowers who may otherwise not qualify for or would have difficulty obtaining traditional financing. During the evaluation period, the bank originated 56 WHEDA mortgage loans and 67 Federal Housing Administration (FHA) loans totaling \$7.4 million and \$10.3 million, respectively. Additionally, the bank originated 17 VA mortgage loans totaling \$4.1 million.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Kenosha MD was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

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

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full-scope reviews, the bank's performance in the Milwaukee-Waukesha MSA was adequate and performance in the Racine MSA was very poor.

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

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

Assessment Area	Qualified Investments								Unfunded Commitments**	
	Prior Period*		Current Period		Total					
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kenosha MD	2	\$243	3	\$3	5	6.5	\$246	2.8	0	0
Milwaukee-Waukesha MSA	4	\$1,446	53	\$6,170	57	74.0	\$7,616	88.0	0	0
Racine MSA	0	\$0	3	\$4	3	3.9	\$4	0.0	0	0
Broader Statewide and Regional Area	0	\$0	12	\$794	12	15.6	\$794	9.2	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.

Milwaukee-Waukesha MSA

The bank exhibited adequate performance in the AA. TCNB had 57 qualified CD investments and donations totaling \$7.6 million, which is equivalent to 4.5 percent of allocated tier 1 capital. During the evaluation period, TCNB made 53 current period CD investments and donations totaling \$6.2 million. Additionally, the AA benefitted from the ongoing impact of four prior period CD investments with an outstanding balance of \$1.4 million. The bank's CD investments were responsive to affordable housing, economic development, and supporting community services dedicated to LMI individuals.

Examples of CD investments and donations include:

- A \$4.0 million investment to support and fund the construction of a new school in a majority minority, low-income area.
- Over the evaluation period, the bank purchased certificates of deposit totaling \$1.5 million in two minority-owned depository institutions (MDIs). MDIs serve an important role in addressing financial needs in minority and low-income communities.
- A \$420,000 investment in a loan pool that helps support and fund small businesses within the AA.
- Grants totaling \$22,000 to a 501(c) 3 non-profit organization serving LMI homeownership whose goal is to reduce social, economic, and environmental disparities by providing free home repairs throughout the AA for eligible homeowners.

Racine MSA

The bank exhibited very poor performance in the AA. TCNB made three current period qualified CD donations totaling \$4,000 which is equivalent to 0.01 percent of allocated tier 1 capital. The bank's donations benefitted affordable housing and economic development in the AA.

Broader Statewide and Regional Area

The bank purchased certificates of deposit totaling \$750,000 within the broader statewide and regional area during the evaluation period. TCNB invested \$750,000 during the evaluation period in a community development financial institution (CDFI) serving the broader statewide and regional area.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Kenosha MD was stronger than the bank's overall performance under the Investment Test in the full-scope areas. Stronger performance was due to a higher volume of qualified investments as a percentage of tier 1 capital allocated to the AA. The bank's performance under the Investment Test in the limited-scope area had a positive impact on the bank's overall Investment Test rating for the state of Wisconsin.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank's performance in the Milwaukee-Waukesha MSA was good and in the Racine MSA the bank's performance was adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Kenosha MD	1.6	1	3.6	0.0	100.0	0.0	0.0	16.1	26.2	52.8	3.4
Milwaukee-Waukesha MSA	82.2	23	82.1	0.0	34.8	43.5	21.7	15.0	18.2	32.0	33.6
Racine MSA	16.2	4	14.3	0.0	0.0	50.0	50.0	9.1	17.9	36.9	35.7

Milwaukee-Waukesha MSA

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. The bank has 23 branches located in the AA. There are no branches in low-income geographies compared to 15.0 percent of the AA's population located within low-income geographies. There are eight branches, representing 34.8 percent of the branches were in a moderate-income geography, which exceeded the percentage of population in moderate-income geographies of 18.2 percent.

The bank provides additional access to its retail banking services through alternative delivery systems including digital banking (online account opening and mobile banking to its customers) and 21 ATMs throughout the AA, (seven of which are in moderate-income geographies) offering balance inquiries, account transfers, and cash disbursements. The bank did not provide data indicating the usage by LMI people; therefore, we placed no significance in our conclusions on alternative delivery services.

Racine MSA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank has four branches located in the AA. There are no branches located in either LMI geographies compared to the 9.1 percent and 17.9 percent of the AA's population located within those geographies, respectively.

The bank provides additional access to its retail banking services through alternative delivery systems including digital banking (online account opening and mobile banking to its customers) and three ATMs

throughout the AA (none of which are located in LMI geographies) offering balance inquiries, account transfers, and cash disbursements. The bank did not provide data indicating the usage by LMI people; therefore, we placed no significance in our conclusions on alternative delivery services.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Kenosha MD	0	0	0	0	0	0
Milwaukee-Waukesha MSA	0	4	0	0	-2	-2
Racine MSA	0	2	0	-1	-1	0

Milwaukee-Waukesha MSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed four branches in their Milwaukee-Waukesha MSA. Two branches were closed in middle-income CTs and two were closed in upper-income CTs.

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

Racine MSA

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to LMI individuals. The bank closed two branches within the AA during the evaluation period. One branch was in a moderate-income CT and the other branch in a middle-income CT. The bank reported that the branch in the moderate-income CT closed because of low transaction volume, lack of new customer activity, the availability of alternative channel resources, and nearby locations that could accommodate the additional customer transactions.

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

Community Development Services

The institution provided a relatively high level of CD services.

Milwaukee-Waukesha MSA

The institution provided a relatively high level of CD services in the AA.

During the evaluation period, 39 bank employees provided 173 qualified CD service activities totaling 524 qualified service hours within the Milwaukee-Waukesha AA. Twenty-two bank employees provided 302 CD service hours through board and committee participation. In addition, bank employees provided 221 CD service hours presenting financial literacy and first-time home buyer seminars and providing credit counseling and assistance to LMI individuals throughout the evaluation period.

Service activity examples during the evaluation period include:

- One bank employee provided 60 hours by serving on the board of directors and loan committee of a local economic development organization. The organization leverages funding from private and public sources to finance projects of businesses in hard to serve or underserved markets.
- One bank employee provided 75 hours by serving on the board of directors for a non-profit organization. The non-profit organization's goal is to reduce social, economic, and environmental disparities by providing free home repairs throughout Milwaukee and Waukesha counties.
- One bank employee provided 27 hours by serving on an advisory board and finance committee for a non-profit organization. The non-profit organization collects money, food, clothing, and other essentials for the needy within the community.

Racine MSA

The institution provided an adequate level of CD services in the AA.

During the evaluation period, six bank employees provided 24 qualified CD service activities totaling 56 qualified service hours throughout the Racine AA. Bank employees provided 34.5 CD service hours presenting the financial literacy and first-time home buyer seminars and providing credit counseling and assistance to LMI individuals.

- One bank employee provided 20 hours by serving on a local planning board that reviews economic development requests.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Kenosha MD is consistent with the bank's overall performance under the Service Test in the full-scope areas.

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2021, to December 31, 2023	
Bank Products Reviewed:	Loans – home mortgage, small business, and small farm Community Development – loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wisconsin		
Milwaukee-Waukesha MSA	Full-Scope	Milwaukee and Waukesha Counties
Racine MSA	Full-Scope	Racine County
Kenosha MD	Limited-Scope	Kenosha County

Appendix B: Summary of MMSA and State Ratings

RATINGS					Tri City National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating					
Tri City National Bank	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory					

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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																				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	
Kenosha MD	23	6,168,250	3.0	9,501	8.0	13.0	7.0	36.5	43.5	34.8	55.5	43.5	58.1	0.0	0.0	0.0	0.0	0.0	0.0	
Milwaukee Waukesha MSA	563	129,210,323	72.8	75,515	8.9	6.0	4.6	14.5	15.8	12.4	32.0	37.3	31.4	44.5	40.9	51.7	0.0	0.0	0.0	
Racine MSA	187	31,279,347	24.2	11,903	2.7	2.7	1.4	16.1	13.4	14.0	57.4	64.2	59.4	23.6	19.8	24.9	0.2	0.0	0.3	
Total	773	166,657,920	100.0	96,919	8.0	5.4	4.4	17.0	16.0	14.8	37.7	44.0	37.4	37.2	34.5	43.3	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%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **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
Kenosha MD	34	22,855,911	3.6	3,641	9.9	5.9	10.6	25.2	26.5	27.7	59.2	50.0	57.3	4.7	5.9	3.7	1.0	11.8	0.7
Milwaukee-Waukesha MSA	698	230,511,465	74.5	30,029	6.7	5.3	7.9	14.7	17.2	15.5	35.8	43.6	35.1	42.6	34.0	41.2	0.2	0.0	0.3
Racine MSA	205	40,075,936	21.9	5,163	4.2	5.9	5.0	15.0	19.5	19.0	38.1	42.4	38.2	42.7	32.2	37.8	0.0	0.0	0.0
Total	937	293,443,313	100.0	38,833	6.7	5.4	7.8	15.8	18.0	17.1	38.6	43.5	37.6	38.6	32.6	37.2	0.3	0.4	0.3

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%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			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
Kenosha MD	23	6,168,250	3.0	9,501	29.6	8.7	15.7	21.6	30.4	24.7	22.3	17.4	22.7	26.4	26.1	23.7	0.0	17.4	13.1
Milwaukee-Waukesha MSA	563	129,210,323	72.8	75,515	25.7	14.4	6.8	16.3	23.6	18.3	19.0	21.1	22.3	39.0	29.5	38.9	0.0	11.4	13.7
Racine MSA	187	31,279,347	24.2	11,903	20.0	12.8	6.7	17.8	24.1	19.2	21.9	26.2	23.6	40.3	31.0	36.9	0.0	5.9	13.6
Total	773	166,657,920	100.0	96,919	25.4	13.8	7.7	17.0	23.9	19.1	19.7	22.3	22.5	37.9	29.8	37.1	0.0	10.2	13.6

*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%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Kenosha MD	34	22,855,911	3.6	3,641	29.0	26.5	18.4	22.3	32.4	27.8	22.5	11.8	22.2	26.2	11.8	19.1	0.0	17.6	12.5	
Milwaukee-Waukesha MSA	698	230,511,465	74.5	30,029	24.3	15.3	8.2	17.0	20.9	20.4	19.9	19.5	21.5	38.7	25.4	36.5	0.0	18.9	13.4	
Racine MSA	205	40,075,936	21.9	5,163	21.0	19.0	8.2	18.3	28.8	21.8	20.1	20.5	24.4	40.5	20.5	33.7	0.0	11.2	12.0	
Total	937	293,443,313	100.0	38,833	24.4	16.5	9.1	17.7	23.1	21.3	20.2	19.4	21.9	37.7	23.8	34.5	0.0	17.2	13.1	
<i>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%</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
Kenosha MD	12	1,849	4.0	3,377	8.6	33.3	7.3	36.2	16.7	33.7	55.3	50.0	59.0	0.0	0.0	0.0	0.0	0.0	0.0
Milwaukee-Waukesha MSA	241	66,074	80.1	30,813	13.7	12.9	12.5	14.2	19.1	12.9	31.3	33.2	30.8	40.8	34.9	43.8	0.1	0.0	0.0
Racine MSA	48	8,516	15.9	3,593	5.3	4.2	5.5	18.9	12.5	17.8	53.6	62.5	52.4	19.3	14.6	21.3	2.9	6.3	3.1
Total	301	76,439	100.0	37,783	12.4	12.3	11.4	16.5	17.9	15.2	35.5	38.5	35.4	35.3	30.2	37.7	0.3	1.0	0.3

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%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kenosha MD	22	3,626	4.0	3,055	11.8	22.7	9.9	23.4	18.2	21.1	57.2	40.9	60.9	2.9	9.1	4.0	4.6	9.1	4.1
Milwaukee-Waukesha MSA	417	100,640	76.5	28,924	12.7	9.8	8.7	17.7	27.8	16.1	30.4	36.0	31.2	38.4	26.1	43.3	0.8	0.2	0.6
Racine MSA	106	18,243	19.4	3,416	10.8	10.4	8.9	15.5	9.4	13.7	36.3	56.6	36.3	37.3	23.6	41.1	0.1	0.0	0.0
Total	545	122,509	100.0	35,395	12.4	10.5	8.9	17.9	23.9	16.3	33.0	40.2	34.3	35.7	25.0	39.7	1.0	0.6	0.8

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%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												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	
Kenosha MD	12	1,849	4.0	3,377	81.9	75.0	47.0	5.6	8.3	12.6	16.7	
Milwaukee-Waukesha MSA	241	66,074	80.1	30,813	80.6	58.5	51.1	7.9	26.6	11.6	14.9	
Racine MD	48	8,516	15.9	3,593	82.6	47.9	48.5	6.3	39.6	11.1	12.5	
Total	301	76,439	100.0	37,783	80.9	57.5	50.5	7.5	27.9	11.6	14.6	

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%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												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	
Kenosha MD	22	3,626	4.0	3,055	87.8	77.3	55.6	3.3	13.6	8.9	9.1	
Milwaukee-Waukesha MSA	417	100,640	76.5	28,924	88.0	51.1	53.2	4.2	33.6	7.8	15.3	
Racine MSA	106	18,243	19.5	3,416	88.6	41.5	51.6	3.6	37.7	7.8	20.8	
Total	545	122,509	100.0	35,395	88.1	50.3	53.2	4.0	33.6	7.9	16.1	

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%