



PUBLIC DISCLOSURE

January 3, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Merchants Bank, National Association
Charter Number: 14488

102 Plaza East
Winona, MN 55987

Office of the Comptroller of the Currency

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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 following table indicates the performance level of Merchants Bank, N.A. (Merchants or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Merchants Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve		X	
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 High Satisfactory rating received in all the bank’s rating areas.
- The Investment Test rating is based primarily on the Needs to Improve rating in the state of Minnesota and the La Crosse Multistate Metropolitan Statistical Area (MMSA).
- The Service Test rating is based primarily on the High Satisfactory rating in the state of Minnesota. The state of Minnesota received the most weight given it contains the vast majority of the bank’s branches, loans, and deposits.

In addition to activities at the state and MMSA level, we considered the following activities at the bank-wide level:

- Merchants uses flexible home loan programs targeted to low- and moderate-income (LMI) individuals, including Federal Housing Association, Veterans Affairs, and United States Department of Agriculture loans. Merchants also originates loans through Fannie Mae’s HomeReady and Freddie Mac Home Possible programs, which are low-down payment and flexible funding mortgage products designed for LMI borrowers. Loans originated under these programs are included in the bank’s home mortgage lending analysis.
- Merchants offers a full line of deposit products such as checking accounts, savings accounts, certificates of deposit, individual retirement accounts, and health savings accounts. Retail

banking services targeted to LMI individuals, but available to all customers, include free checking accounts and basic savings accounts, which have a low minimum amount to open and avoid fees. The bank offers alternative delivery systems that are available to all individuals and geographies including mobile banking, online banking, telephone banking, and free automatic teller machine (ATM) usage at all Kwik Trip convenience store locations.

Lending in Assessment Area

An adequate percentage of the bank's loans are in its assessment area(s) (AA).

The bank originated and purchased 56.6 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	7,663	50.0	7,666	50.0	15,329	1,304,248	44.0	1,658,375	56.0	2,962,623
Small Business	5,075	61.8	3,132	38.2	8,207	604,055	55.1	491,574	44.9	1,095,629
Small Farm	1,681	85.3	290	14.7	1,971	154,486	84.0	29,478	16.0	183,964
Total	14,419	56.5	11,088	43.5	25,507	2,062,789	48.6	2,179,427	51.4	4,242,216

Source: Bank Data. Due to rounding, totals may not equal 100.0%

Description of Institution

Merchants Bank, NA is \$2.8 billion and headquartered in Winona, MN. The bank has 23 branch locations located in southeastern Minnesota, western Wisconsin, and the southern Twin Cities suburbs.

Merchants Financial Group Inc. (MFGI the parent HC) is widely held and owns 100 percent of Merchants. MFGI completed their acquisition of First National Bank of Northfield (FNB Northfield) on August 30, 2019. FNB Northfield later merged into Merchants Bank, NA on May 14, 2020. The bank owns two subsidiaries - Hiawatha Holding Company and Merchants Community Development. There are no activities reported in these entities. Hiawatha Holding Company was established to hold bank other real estate owned. Merchants Community Development was established to conduct CRA activity within the bank's market area. Merchants Bank also has a commercial leasing subsidiary, Merchants Bank Equipment Finance, located in Minneapolis, MN.

Merchants Bank is a full-service financial institution offering a wide variety of loan and deposit products to both retail and commercial customers. The bank provides home loans through a network of correspondent banks with approximately 103 locations in Minnesota, Wisconsin, Iowa, North Dakota, and South Dakota. Merchants Bank is a Small Business Administration (SBA) preferred lender, preferred Farm Service Agency (FSA) lender, and offers FSA guaranteed loan programs. As of

December 31, 2021, Merchants had total loans of \$1.6 billion, total assets of \$2.8 billion, and Tier One capital of \$247 million.

In March 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

During the evaluation period, the bank strategically targeted certain activities to assist in addressing economic hardships associated with the pandemic. To assist their borrowers experiencing financial difficulty, the bank offered various services and relief options including loan deferrals, modifications, hardship assistance, forbearance plan options, and other repayment plans. Merchants assisted over 600 customers with COVID-19 loss mitigation options. The bank also participated in the SBA's Paycheck Protection Program (PPP). A PPP loan is SBA-backed and helped businesses keep their workforce employed during the pandemic. Between 2020-2021, Merchants originated 3,066 PPP loans with total proceeds of \$287.2 million.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. The bank's CRA performance was rated "Satisfactory" in the last public evaluation dated May 6, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service Tests was January 1, 2018, through December 31, 2021. We analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and farms the bank reported under the CRA. We compared home mortgage loans originated or purchased during the evaluation period to the 2015 American Community Service (ACS) survey data.

To perform a meaningful analysis for lending performance, a minimum of 20 loans were needed in a loan product during the evaluation period. Refer to the "Scope of Evaluation" section under each MMSA and State Rating area section for details on loan products that did not have a sufficient volume to perform a quantitative analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs 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), 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 multistate and state ratings. The rating for the state of Minnesota received the greatest emphasis in our analysis. Emphasis was determined considering the bank's deposit volume, branch presence, and loan volume in the La Crosse MMSA and each state relative to the entire bank. The state of Minnesota represented 78.4 percent of deposits, 73.5 percent of loans originated and purchased, and 79.2 percent of Merchant's branch network.

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

Other Factors Considered in our Analysis under Performance Tests

Investment Test

Under the Investment Test, we considered grants and investments made by the bank and considered the responsiveness of those grants and investments to identified Community Development (CD) needs. We also considered investments made during prior evaluation periods that remain outstanding and continue to provide benefit to the AA. We considered prior-period investments at the book value at the end of the current evaluation period and current-period investments at their original investment amount. We compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the tier 1 capital allocated to the AAs to gain a perspective regarding the volume of investment activity. Tier 1 capital was allocated to the rating areas and AAs based on the percentage of bank deposits that were maintained in the rating areas and AAs. Qualitative factors, such as responsiveness, complexity, and innovation were considered in full scope review areas.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

Multistate Metropolitan Statistical Area Rating

La Crosse-Onalaska, WI-MN MMSA (La Crosse MMSA)

CRA rating for the La Crosse MMSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA.
- A good geographic distribution of loans in its AA.
- A good distribution of loans to borrowers of different income levels and businesses and farms of different sizes.
- CD loans represent poor responsiveness to AA needs. The bank made a low level of CD loans.
- A poor level of qualified investments and grants, exhibiting poor responsiveness to AA needs.
- Service delivery systems are unreasonably inaccessible to portions of the AA. There are no branches located in LMI geographies.
- An adequate level of CD service hours.

Description of Institution's Operations in La Crosse MMSA

The La Crosse MMSA consists of La Crosse County (WI) and Houston County (MN) in their entirety, which comprise the La Crosse-Onalaska, WI-MN MSA. This AA includes 25 census tracts in La Crosse County and five census tracts in Houston County. The La Crosse MMSA is the second largest rating area for the entire bank with 17.8 percent of deposits, 16.7 percent of branches, and 23.3 percent of all bank loans.

There is a high level of competition for financial services in the La Crosse MMSA. As of June 30, 2021, FDIC deposit market share data shows 18 financial institutions operating 47 offices in the AA. Of those institutions, Merchants ranked third with 10 percent of the deposit market share. The top two institutions accounted for 33.5 percent of the deposit market share.

According to 2021 D&B data, service industries represented the largest portion of businesses at 39.1 percent; followed by retail trade at 14.8 percent; finance, insurance, and real estate at 9.1 percent, and non-classifiable establishments at 9.0 percent. In addition, 64.1 percent of AA businesses have four or fewer employees, and 84.4 percent operate from a single location.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the La Crosse MMSA was relatively stable until the pandemic caused it to rise from 3.3 percent in March 2020 to 11.9 percent in April 2020. As of December 2021, the unemployment rate improved to 1.8 percent, compared to 2.3 percent and 2.6 percent in the states of Wisconsin and Minnesota, respectively.

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

We referenced three community contacts performed during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial institutions in the AA. Contacts included a business development center and an economic development organization. The contacts indicated a need for affordable housing, small business financing, and technical assistance to small businesses. Both contacts noted the retail and food sectors were hardest hit by the pandemic. One contact discussed the need to assist small businesses in succession planning and to offer flexible lending options to assist small business owners and entrepreneurs. Business education related to financial literacy, accounting/financial programs, and how the businesses can become profitable are areas of need. This would also include more education about SBA and other loan programs to assist small business owners and entrepreneurs. Another contact indicated that some small businesses were not able to easily obtain a PPP loan if they did not already have an established banking relationship. This contact also identified micro-lending and technical assistance for small businesses as areas of need.

The following table illustrates selected demographic characteristics of the La Crosse MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Merchants - La Crosse MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	3.3	13.3	63.3	16.7	3.3
Population by Geography	135,860	1.8	13.5	65.8	15.3	3.6
Housing Units by Geography	57,633	2.3	14.9	66.3	15.2	1.4
Owner-Occupied Units by Geography	36,449	0.3	6.4	73.7	19.2	0.4
Occupied Rental Units by Geography	17,782	5.7	30.9	51.8	8.0	3.7
Vacant Units by Geography	3,402	5.7	21.6	62.7	10.0	0.0
Businesses by Geography	7,948	9.7	13.4	64.9	11.1	0.9
Farms by Geography	540	0.6	2.0	87.8	9.3	0.4
Family Distribution by Income Level	33,393	18.6	18.9	22.7	39.8	0.0
Household Distribution by Income Level	54,231	21.8	17.3	19.0	41.9	0.0
Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA		\$68,531	Median Housing Value			\$155,525
			Median Gross Rent			\$750
			Families Below Poverty Level			6.9%
<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>						

Scope of Evaluation in La Crosse MMSA

The La Crosse MMSA received a full-scope review. Home mortgage loans received the most weight as it accounted for significantly more volume by both number of loans and dollar volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LA CROSSE MMSA

LENDING TEST

The bank's performance under the Lending Test in the La Crosse MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the La Crosse MMSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
La Crosse MMSA	1,731	1,206	412	1	3,350

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
La Crosse MMSA	317,097	154,440	32,834	245	504,616

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$425.4 million in deposits with a market share of 10 percent. The bank ranked third in total deposits out of 18 banks in the AA.

According to 2021 peer mortgage data, the bank ranked second out of 221 lenders, originating home mortgage loans in AA. The bank's market share of 6.6 percent in loans is weaker than the bank's market share in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA.

According to the 2020 peer small business data, the bank ranked first out of 65 lenders originating small business loans in the AA. The bank's market share of 26.2 percent and rank is stronger than the bank's market share in deposits and rank in deposits.

According to the 2020 peer small farm data, the bank ranked first out of 11 lenders originating small farm loans in the AA. The bank's market share of 48.9 percent and rank is higher than the bank's market share and rank in deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is good.

The proportion of loans in low-income geographies exceeds the percentage of owner-occupied housing units and meets aggregate lending in those geographies. The portion of loans in moderate-income geographies is below the percentage of owner-occupied housing units and aggregate lending in those geographies. Lending opportunities were greater in moderate-income geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is adequate.

The proportion of loans in low-income geographies was well below the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was below the percentage of businesses but near aggregate lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the La Crosse MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate considering performance context.

The proportion of loans in low- and moderate-income geographies was well below both the percentage of farms and aggregate lending in low- and moderate-income geographies. Demographic data indicates that only three farms, or 0.6 percent of all farms in the AA, are located in the AA's one low-income CT. Similarly, there are only ten farms, or 2.0 percent of all farms in the AA, located in the four moderate-income CTs. This presents limited lending opportunities.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the La Crosse MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good considering performance context.

The proportion of loans to low-income borrowers is well below the percentage of low-income families but somewhat near to aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. Demographics show that 18.6 percent of families are low-income

and 6.9% of families are below poverty level in the AA. With median family income of \$68,531, low-income borrowers earn less than \$34,266 a year. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$857 for low-income borrowers. Assuming a 30-year mortgage with a five 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 at the \$155,525 median housing value would be \$835. These costs are challenging and may limit lending opportunities for low-income families. The proportion of loans to moderate-income borrowers approximates the percentage of moderate-income families and is somewhat below aggregate lending.

Small Loans to Businesses

Refer to Table R in the La Crosse MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses by revenue is good.

The proportion of loans was well below the percentage of small businesses but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of small businesses.

Small Loans to Farms

Refer to Table T in the La Crosse MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The borrower distribution of small loans to businesses by revenue is excellent.

The proportion of loans was near to the percentage of small farms, but significantly exceeded aggregate lending.

Community Development Lending

The institution has made a low level of CD loans.

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

The bank originated one CD loan totaling \$244.7 thousand representing 0.6 percent of allocated tier 1 capital. Funds supported affordable housing offered by a non-profit community service organization. CD loans exhibit poor responsiveness to CD needs within the AA.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs. Merchant's Onalaska branch is a member of the Powell-Poage-Hamilton and Washburn Neighborhood Revitalization Lender Consortium, which works in tandem with the La Crosse Promise organization. Together, they offer a program to assist homebuyers in constructing a new home or

purchasing and renovating an existing home in the Powell-Poage-Hamilton and Washburn neighborhoods. These neighborhoods are located in LMI CTs. The appraised value of these homes would normally not fit the loan-to-value requirements for loan approval if not part of this program. The program helps to revitalize LMI neighborhoods.

INVESTMENT TEST

The institution’s performance under the Investment Test in the La Crosse MMSA is rated Needs to Improve.

Based on a full-scope review, the institution’s performance in the La Crosse MMSA is poor.

The institution has a few qualified CD investments or grants, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

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)
La Crosse MMSA	2	86	68	98	70	100.0	185	100.0	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.

Merchant’s qualified investments and donations demonstrate poor responsiveness to needs and opportunities in the La Crosse MMSA. Qualified investments and donations total \$185 thousand for the evaluation period and represent 0.4 percent of allocated capital. Allocated capital is the bank’s tier one capital as of December 31, 2021, multiplied by the portion of the bank’s deposits in the AA.

During the evaluation period, Merchants made 68 donations totaling \$98 thousand that benefited the La Crosse MMSA. The donations primarily supported organizations providing services to LMI individuals, and to a lesser extent supported organizations providing affordable housing and economic development within the AA. The bank also made \$13 thousand in qualified donations that benefited a broader regional area that includes the La Crosse MMSA.

There were two prior period investments in mortgage-backed securities (MBS) that were outstanding during the current evaluation period and benefited the La Crosse MMSA. The two prior period investments had an outstanding balance of \$86 thousand as of December 31, 2021. The MBS supported affordable housing for LMI families in the La Crosse MMSA and are considered complex investments.

SERVICE TEST

The institution’s performance under the Service Test in the La Crosse MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution’s performance in the La Crosse MMSA is adequate.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
La Crosse MMSA	100.0	4	100.0	0.0	0.0	100.0	0.0	1.8	13.5	65.8	15.3
<i>Source: 2015 ACS data and bank data. The population percentages do not equal 100.0% because 3.6% of the population lives in a geography that has not been assigned an income classification.</i>											

There are four branches in the La Crosse MMSA, all of which are located in a middle-income CTs. There are no branches located in or near LMI geographies. The branch distribution across LMI geographies compares poorly to demographic data that shows 1.8 percent of the population lives in a low-income CT and 13.5 percent of the population lives in a moderate-income CT. There are no deposit-taking ATMs in the AA.

The bank did not open or close branches in the La Crosse MMSA during the evaluation period.

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

Lobby and drive-up hours are similar between all branches in the AA and comparable to branches in other AAs. Each of the four branches offer similar lobby and drive-up service hours each weekday and drive-up hours on Saturday morning. Merchants offers free checking and low-cost savings accounts at all branches, which benefit individuals including LMI customers.

Community Development Services

The institution provides an adequate level of CD services. 16 employees provided 386 service hours to 11 organizations in the La Crosse MMSA during the evaluation period. The organizations provide community services to LMI individuals or promote economic development.

The following are examples of some of the CD services provided to the La Crosse MMSA during the evaluation period:

- One employee served as a Board member for a food bank providing food to food shelves in the La Crosse area.
- One employee served as Vice President and later President for an organization that provides financing and technical assistance for small businesses in Houston County.

- One employee served on the financial review committee for an organization serving LMI individuals and supporting other nonprofits serving LMI individuals in La Crosse and Houston Counties.

State Rating

State of Minnesota

CRA rating for the State of Minnesota²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA.
- An excellent geographic distribution based on excellent dispersion of home mortgage and small business loans and adequate dispersion of small farm loans.
- An excellent borrower distribution based on excellent distribution of home mortgage, adequate distribution of small business lending, and good distribution of small farm lending.
- A relatively high level of CD loans made in the Twin Cities and Rochester MSAs, but the lack of CD lending in the MN non-MSA had a negative impact on the overall rating.
- A poor level of qualified investments and grants, exhibiting poor responsiveness to community needs.
- The bank's service delivery systems are readily accessible to portions of the AA.
- An adequate level of CD services.

Description of Institution's Operations in Minnesota

The bank has three assessment areas in the state of Minnesota: MN non-MSA, Twin Cities MSA, and the Rochester MSA. The bank's operations in Minnesota comprise 78.4 percent of total bank deposits, 79.2 percent of total bank branches, and 73.5 percent of bank loans.

MN non-MSA

The MN non-MSA consists of the entire counties of Goodhue and Winona and a portion of Rice County. The addition of two acquired branches in Northfield, MN, resulted in adding the northern half of Rice County to the AA in May 2020. The AA includes ten census tracts in Goodhue County, ten in Winona County, and 7 of 13 CTs in Rice County. The MN non-MSA is the largest AA in the state of Minnesota with 63.7 percent of deposits, 42.1 percent of branches, and 57.7 percent of loans in MN.

There is a high level of competition for financial services in the MN non-MSA. As of June 30, 2021, FDIC deposit market share data shows 26 financial institutions operating 54 offices in the AA. Of those institutions, Merchants ranked first with 26.7 percent of the deposit market share.

According to 2021 D&B data, service industries represented the largest portion of businesses at 35.5 percent; followed by non-classifiable establishments at 13.1 percent, retail trade at 11.3 percent, and agriculture, forestry, and fishing at 9.8 percent. In addition, 68.6 percent of AA businesses have four or fewer employees, and 91.1 percent operate from a single location.

² The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2021 unemployment rate was 2.5 percent, 2.7 percent, and 2.1 percent for Goodhue, Rice, and Winona Counties, respectively. Goodhue and Winona Counties compared favorably to the state of MN’s 2.6 percent unemployment rate, but Rice County was slightly higher. Goodhue County recovered significantly from the 11.6 percent unemployment rate reported in May 2020 at the beginning of the pandemic.

We reviewed three community contacts conducted during the evaluation period in the AA. Contacts included an economic development organization, a non-profit organization that provides community grants, and one agency providing agricultural programs. The contacts indicated a need for affordable housing, small business financing, and technical assistance to small businesses. One contact indicated that agriculture lending is a primary credit need. There are a declining number of farms, profit margins are tight, and many farmers cannot get conventional financing. Another contact discussed the need to assist small businesses with micro-lending and technical assistance. Many small businesses closed due to the pandemic, but new prospective business owners are still seeking financing.

The following table illustrates selected demographic characteristics of the MN non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN non-MSA - 2018-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	5.0	75.0	20.0	0.0
Population by Geography	97,590	0.0	4.0	76.9	19.1	0.0
Housing Units by Geography	41,237	0.0	4.6	76.2	19.2	0.0
Owner-Occupied Units by Geography	27,571	0.0	5.1	72.1	22.7	0.0
Occupied Rental Units by Geography	10,290	0.0	3.8	87.1	9.0	0.0
Vacant Units by Geography	3,376	0.0	3.1	75.5	21.4	0.0
Businesses by Geography	6,600	0.0	4.9	76.0	19.1	0.0
Farms by Geography	841	0.0	0.4	59.6	40.1	0.0
Family Distribution by Income Level	23,875	14.9	16.5	22.2	46.4	0.0
Household Distribution by Income Level	37,861	23.0	15.5	17.1	44.5	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$172,273
			Median Gross Rent			\$650
			Families Below Poverty Level			7.0%
<i>Source: 2015 ACS and 2019 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: MN non-MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	3.7	66.7	29.6	0.0
Population by Geography	129,716	0.0	3.0	67.6	29.4	0.0

Housing Units by Geography	52,628	0.0	3.6	68.0	28.4	0.0
Owner-Occupied Units by Geography	35,628	0.0	4.0	62.5	33.5	0.0
Occupied Rental Units by Geography	12,786	0.0	3.1	83.5	13.4	0.0
Vacant Units by Geography	4,214	0.0	2.5	67.0	30.5	0.0
Businesses by Geography	10,430	0.0	3.4	65.0	31.6	0.0
Farms by Geography	1,135	0.0	0.7	49.3	50.0	0.0
Family Distribution by Income Level	31,215	14.4	15.6	21.9	48.0	0.0
Household Distribution by Income Level	48,414	22.0	14.8	16.6	46.5	0.0
Median Family Income Non-MSAs - MN	\$63,045	Median Housing Value				\$180,961
		Median Gross Rent				\$682
		Families Below Poverty Level				6.7%
<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>						

Twin Cities MSA

The Twin Cities MSA AA consists of the southern portions of Dakota and Washington Counties. Dakota and Washington Counties are part of the Minneapolis-St. Paul-Bloomington, MN-WI MSA. The AA includes 47 of 95 CTs in Dakota County and 8 of 50 CTs in Washington County. The Twin Cities MSA is the second largest AA in the state of Minnesota with 22.2 percent of deposits, 36.9 percent of branches, and 20 percent of bank loans in MN.

Competition for financial services in the Twin Cities MSA is significant. As of June 30, 2021, FDIC deposit market share data shows 47 financial institutions operating 153 offices in the AA. Of those institutions, Merchants ranked eighth with 2.6 percent of the deposit market share. The top five institutions accounted for 59.2 percent of the deposit market share. These institutions include Wells Fargo, U.S Bank, The Huntington National Bank, Bremer Bank N.A., and Old National Bank.

According to 2021 D&B data, service industries represented the largest portion of businesses at 38 percent; followed by non-classifiable establishments at 20 percent; finance, insurance, and real estate at 10 percent, and construction at 9.8 percent. In addition, 67.9 percent of AA businesses have four or fewer employees, and 94.5 percent operate from a single location.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2021 unemployment rate was 2.3 percent and 2.1 percent for Dakota and Washington Counties, respectively. Unemployment rates impacted by the pandemic peaked at 11.6 percent and 10.5 percent in May 2020 for Dakota and Goodhue Counties, respectively. Dakota and Washington Counties compared favorably to the state of MN's 2.6 percent unemployment rate as of December 2021.

We reviewed three community contacts conducted in the AA during the evaluation period. Contacts included one agency involved with economic development and housing programs, one non-profit organization associated with housing and economic development initiatives, and one organization promoting local business communities. All three contacts noted an affordable housing crisis in the AA with a shortage of affordable housing and higher housing costs. Housing stock is purchased, rehabilitated, and then sold for significantly higher prices which is not affordable. Housing expenses have led to LMI individuals moving further out of the cities, which puts them further away from

employment opportunities and reduces their access to mass transit. The AA is very competitive for financial services. One contact noted that smaller financial institutions need a community tie to customers and businesses to compete. There are several large, well-known lenders in the AA that edge out other institutions due to name recognition.

Contacts identified credit needs for both mortgages and small business loans. There is a need for down payment savings and assistance programs and pre-purchase homeownership counseling. One contact discussed the need for more aggressive financing for non-profit builders to help build up the housing supply. Banks could do a greater volume and higher amounts of subsidized CRA qualified investments involving non-profit builders and affordable housing organizations. There is also a need for loans and technical assistance to start-ups, small businesses, and expanding businesses.

The following table illustrates selected demographic characteristics of the Twin Cities MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Twin Cities MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	9.1	50.9	40.0	0.0
Population by Geography	272,896	0.0	7.4	50.6	42.0	0.0
Housing Units by Geography	101,603	0.0	8.1	52.9	39.0	0.0
Owner-Occupied Units by Geography	81,752	0.0	5.5	51.2	43.3	0.0
Occupied Rental Units by Geography	16,669	0.0	21.0	59.7	19.3	0.0
Vacant Units by Geography	3,182	0.0	7.9	60.2	31.9	0.0
Businesses by Geography	23,445	0.0	7.2	49.9	42.9	0.0
Farms by Geography	884	0.0	3.8	57.7	38.5	0.0
Family Distribution by Income Level	73,843	13.6	15.9	24.2	46.4	0.0
Household Distribution by Income Level	98,421	14.7	13.7	19.8	51.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA		\$84,589	Median Housing Value			\$227,029
			Median Gross Rent			\$1,066
			Families Below Poverty Level			3.8%
<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>						

Rochester MSA

Merchant's Rochester MSA AA consists of Olmsted County and the eastern half of Fillmore County, which are two of four counties comprising the Rochester, MN MSA. This AA includes three of six census tracts in Fillmore County and all 33 census tracts in Olmsted County. The Rochester MSA is the smallest AA in the state of Minnesota with 14.1 percent of deposits, 21.1 percent of branches, and 22.4 percent of bank loans in MN.

There is a high level of competition for financial services in the Rochester MSA. As of June 30, 2021, FDIC deposit market share data shows 26 financial institutions operating 66 offices in the AA. Of those

institutions, Merchants ranked sixth with 4.3 percent of the deposit market share. The top five institutions accounted for 68.5 percent of the deposit market share. These institutions include Think Mutual Bank, Wells Fargo, U.S. Bank, Bremer Bank N.A., and Home Federal Savings Bank.

According to 2021 D&B data, service industries represented the largest portion of businesses at 36.6 percent; followed by non-classifiable establishments at 16 percent, retail trade at 12.1 percent and finance, insurance, and real estate at 11 percent. In addition, 65.8 percent of AA businesses have four or fewer employees, and 90 percent operate from a single location.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2021 unemployment rate was 2.4 percent and 2.1 percent for Fillmore and Olmsted Counties, respectively. Unemployment rates impacted by the pandemic peaked at 8.2 percent and 11.1 percent in May 2020 for Fillmore and Olmsted Counties, respectively. Both counties compared favorably to the state of MN’s 2.6 percent unemployment rate as of December 2021.

We reviewed seven community contacts conducted in the AAs during the evaluation period. Contacts included economic development non-profit organizations, a housing and redevelopment authority, and a county government office supporting community services. Contacts indicated both a shortage of housing stock and affordable housing in the AAs and challenges with small business financing. Due to lack of availability and increased home prices, an increasing number of people live in surrounding areas and commute to Rochester for work. Multifamily housing units were built in the past six years, but rents are too high for some rental assistance available, impacting LMI individuals. Home mortgage and business lending are primary credit needs within the AAs. Needs include start-up business financing, technical assistance for small businesses, multi-family housing projects, banking the unbanked, and credit rehabilitation programs.

The following table provides information on the demographic composition of the Rochester MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	0.0	27.8	41.7	30.6	0.0
Population by Geography	158,470	0.0	25.9	38.4	35.8	0.0
Housing Units by Geography	66,072	0.0	27.7	38.7	33.5	0.0
Owner-Occupied Units by Geography	45,788	0.0	21.1	39.3	39.6	0.0
Occupied Rental Units by Geography	16,052	0.0	43.9	37.4	18.6	0.0
Vacant Units by Geography	4,232	0.0	38.0	37.3	24.7	0.0
Businesses by Geography	13,729	0.0	25.2	39.5	35.3	0.0
Farms by Geography	807	0.0	26.0	45.5	28.5	0.0
Family Distribution by Income Level	41,222	18.2	17.6	23.1	41.0	0.0
Household Distribution by Income Level	61,840	22.6	15.7	18.6	43.1	0.0
Median Family Income MSA - 40340 Rochester, MN MSA		\$81,036	Median Housing Value			\$183,942
			Median Gross Rent			\$857

Families Below Poverty Level

5.5%

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.

Scope of Evaluation in Minnesota

Merchants has three AAs in the state of Minnesota. We performed a full-scope review of the MN non-MSA, Twin Cities MSA, and Rochester MSA AAs. The analysis period for the Twin Cities MSA and Rochester MSA was 2018-2021. The MN non-MSA had two separate analysis periods, 2018-2019 and 2020-2021, due to acquiring a bank, which added a county to the MN Non-MSA in May 2020. The 2020-2021 was weighted more heavily in the MN non-MSA rating due to the higher volume of loans during that evaluation period. The MN non-MSA is the most significant AA in the state of MN with the most deposit and lending volumes, and branches. The Twin Cities MSA is the next most significant AA in the State of MN. Home mortgage received greater weighting in the state of MN as it accounts for significantly more loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Based on full-scope reviews, the bank's performance in the MN non-MSA is good and performance in the Twin Cities and Rochester MSAs are excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
MN non-MSA	3,327	2,032	738	0	6,097	57.6	63.7
Twin Cities MSA	1,110	912	85	2	2,109	19.9	22.2
Rochester MSA	1,158	772	442	6	2,378	22.5	14.1

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

Dollar Volume of Loans (\$000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
MN non-MSA	492,721	234,583	69,754	0	797,058	54.3	63.7
Twin Cities MSA	213,924	104,711	7,831	5,384	331,850	22.6	22.2
Rochester MSA	196,149	94,069	43,454	4,637	338,309	23.1	14.1

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

MN non-MSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$1.2 billion in deposits with a deposit market share of 26.7 percent. The bank ranked first in total deposits out of 26 banks in the AA.

According to the 2021 peer mortgage data, the bank ranked first out of 289, originating home mortgage loans in the AA. The bank's market share of 14.8 percent is weaker than the bank's deposit market share. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA.

According to the 2020 peer small business data, the bank ranked first out of 71 lenders, originating small business loans in the AA. The bank's market share of 28.6 percent is stronger than the bank's deposit market share.

According to the 2020 peer small farm data, the bank ranked first out of 17 lenders, originating small farm loans in the AA. The bank's market share of 24.9 percent is slightly weaker than the bank's deposit market share.

Twin Cities MSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data of June 30, 2021, the bank had \$416.9 million in deposits with a deposit market share of 2.6 percent. The bank ranked eighth in total deposits out of 47 banks in the AA. The five banks with the largest deposit market shares include Wells Fargo Bank N.A., U.S. Bank N.A., Bremer Bank N.A., The Huntington National Bank, and Old National Bank encompassing 59.2 percent of the deposit market share.

According to the 2021 peer mortgage data, the bank ranked 22nd out of 426 lenders, originating home mortgage loans in the AA. The bank's market share of 1.2 and rank in loans is weaker than the bank's market share and rank in deposits. However, positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The five largest mortgage lenders have captured 27.8 percent of the market.

According to the 2020 peer small business data, the bank ranked seventh out of 129 lenders, originating small business loans in the AA. The bank's market share of 3.5 percent and rank in loans is stronger than the bank's deposit market share and rank in deposits.

According to the 2020 peer small farm data, the bank ranked third out of 16 lenders, originating small farm loans in the AA. The bank's market share of 13.5 percent and rank in loans is stronger than the bank's market share and rank in deposits.

Rochester MSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$265.1 million in deposits with a deposit market share of 4.3 percent. The bank is ranked sixth out of 26 banks in the AA. The five banks with the largest deposit market shares include Think Mutual Bank, Wells Fargo Bank N.A, U.S. Bank N.A., Bremer Bank N.A., and Home Federal Savings Bank encompassing 68.5 percent of the deposit market share.

According to the 2021 peer mortgage data, the bank ranked tenth out of 293 lenders, originating home mortgage loans in the AA. The bank's market share of 3.5 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. However, positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA.

According to 2020 peer small business data, the bank ranked sixth out of 81 lenders, originating small business loans in the AA. The bank's market share of 9.2 percent and rank in loans is stronger than the bank's deposit market share.

According to the 2020 peer small farm data, the bank ranked second out of 15 lenders, originating small farm loans in the AA. The bank's market share of 23 percent and rank in loans is stronger than the bank's market share and rank in deposits.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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.

The overall geographic distribution of home mortgage loans is excellent.

MN non-MSA

The geographic distribution of home mortgage loans is excellent.

For 2018-2019, the proportion of loans in moderate-income geographies significantly exceeded both the percentage of owner-occupied housing units and aggregate lending. The bank's performance for the 2020-2021 evaluation period was consistent with its performance during 2018-2019. There were no low-income geographies in the AA for either evaluation period.

Twin Cities MSA

The geographic distribution of home mortgage loans is excellent.

The proportion of loans in moderate-income geographies significantly exceeds both the percentage of owner-occupied housing units and aggregate lending. There were no low-income geographies in the AA.

Rochester MSA

The geographic distribution of home mortgage loans is excellent.

The proportion of loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and aggregate lending. There were no low-income geographies in the AA.

Small Loans to Businesses

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.

The overall geographic distribution of small loans to businesses is excellent.

MN non-MSA

The geographic distribution of small loans to businesses is excellent.

For 2018-2019, the proportion of loans in moderate-income geographies significantly exceeded both the percentage of business and aggregate lending. The bank's performance for the 2020-2021 evaluation period was consistent with its performance during 2018-2019. There were no low-income geographies in the AA for either evaluation period.

Twin Cities MSA

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in moderate-income geographies significantly exceeded both the percentage of businesses and aggregate lending. There were no low-income geographies in the AA.

Rochester MSA

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in moderate-income geographies significantly exceeded both the percentage of businesses and aggregate lending. There were no low-income geographies in the AA.

Small Loans to Farms

Refer to Table S 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 farms.

The overall geographic distribution of small loans to farms is adequate.

MN non-MSA

The geographic distribution of small loans to farms is adequate considering performance context.

The bank made no small farm loans to moderate-income geographies in both the 2018-2019 and 2020-2021 evaluation periods. Aggregate lending was also low. Demographics indicate there were only three farms and eight farms in the AA during each evaluation period, respectively. This presents limited lending opportunities. There were no low-income geographies in the AA for either evaluation period.

Twin Cities MSA

The geographic distribution of small loans to farms is adequate considering performance context.

The bank made no small farm loans to moderate-income geographies. Aggregate lenders were similarly below the percentage of farms and did not make any small farm loans to moderate-income geographies. Demographics indicate there were only 34 farms within the moderate-income CTs in the AA, which presents limited lending opportunities. There were no low-income geographies in the AA.

Rochester MSA

The geographic distribution of small farms to businesses is excellent.

The proportion of loans in moderate-income geographies significantly exceeded both the percentage of businesses and aggregate lending. There were no low-income geographies in the AA.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified for the MN non-MSA, Twin Cities MSA, or Rochester MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

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.

The overall borrower distribution of home mortgage loans is excellent.

MN non-MSA

The borrower distribution of home mortgage loans is excellent.

For the 2018-2019 evaluation period the proportion of loans to low-income borrowers was below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly below the percentage of low-income families. With median family income of \$63,045, low-income borrowers earn less than \$31,522 a year. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$788 for low-income borrowers. Assuming a 30-year mortgage with a five 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 at the \$172,273 median housing value would be \$925. These costs are challenging and may limit lending opportunities for low-income families. The proportion of loans to moderate-income borrowers was below both the moderate-income families and aggregate lending.

For the 2020-2021 evaluation period, lending performance to low-income borrowers was consistent with 2018-2019 performance. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Twin Cities MSA

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly below the percentage of low-income families. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Rochester MSA

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly below the percentage of low-income families. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

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 origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is adequate.

MN non-MSA

The borrower distribution of small loans to businesses is adequate.

For the 2018-2019 evaluation period, the proportion of loans was well below the percentage of small businesses but exceeded aggregate lending. For the 2020-2021 evaluation period, the proportion of loans was well below both the percentage of small businesses and aggregate lending. However, the bank reported a high percentage of loans (58 percent) made to businesses with unreported revenue in 2020-2021. This was attributed in part to the bank's participation in PPP lending, which did not require collection of revenue information from businesses. Aggregate lenders were similarly well below the percentage of small businesses in both evaluation periods.

Twin Cities MSA

The borrower distribution of small loans to businesses is adequate.

The proportion of loans was well below the percentage of small businesses and below aggregate lending. The bank reported a high percentage of loans (43.1 percent) made to businesses with unreported revenue. This was attributed in part to the bank's participation in PPP lending. Aggregate lenders were similarly below the percentage of small businesses.

Rochester MSA

The borrower distribution of small loans to businesses is adequate.

The proportion of loans was well below the percentage of small businesses and below aggregate lending. The bank reported a high percentage of loans (35.8 percent) made to businesses with unreported revenue. This was attributed in part to the bank's participation in PPP lending.

Small Loans to Farms

Refer to Table T 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.

The overall borrower distribution of small loans to farms is good.

MN non-MSA

The borrower distribution of small loans to farms by revenue is good.

For the 2018-2019 evaluation period, the proportion of loans was near to the percentage of small farms, but significantly exceeded aggregate lending. For the 2020-2021 evaluation period, the proportion of loans was below the percentage of small farms, but significantly exceeded aggregate lending.

Twin Cities MSA

The borrower distribution of small loans to farms by revenue is good.

The proportion of loans was well below the percentage of small farms, but significantly exceeded aggregate lending.

Rochester MSA

The borrower distribution of small loans to farms by revenue is excellent.

The proportion of loans was near to the percentage of small farms, but significantly exceeded aggregate lending.

Community Development Lending

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

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

MN non-MSA

Merchants did not originate any CD loans during the evaluation period, which had a negative impact on the overall lending performance in the MN non-MSA considering credit and community needs in the AA.

Twin Cities MSA

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Twin Cities MSA. The bank originated two CD loans totaling \$5.4 million representing 12.5 percent of allocated tier one capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. Loans were to finance two low-income housing tax credit (LIHTC) projects that created a total of 98 units of affordable housing.

Rochester MSA

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Rochester MSA. The bank originated or renewed six CD loans totaling \$4.6 million representing 17

percent of allocated tier one capital. CD loans exhibited good responsiveness to the credit and community needs in the AA.

CD loans originated during the evaluation period include:

- \$956 thousand loan renewal to a non-profit organization for construction and permanent financing of a commercial building used to generate income to build affordable housing for LMI individuals and families.
- Four annual renewals of a \$200 thousand operating line of credit for a non-profit organization that provides affordable housing solutions to LMI individuals.
- \$2.9 million loan to finance a LIHTC project that created 60 units of affordable housing.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices to serve credit needs in the State of Minnesota. Merchants participated in the Red Wing Housing and Redevelopment Authority Affordable Housing Trust Fund Homebuyer Assistance Program. The purpose of the program is to assist LMI workforce families with the purchase of affordable housing in the City of Red Wing. Eligible households can receive up to \$9 thousand for homebuyer assistance based on need. Merchants offers home mortgage loans through the Minnesota Housing Finance Agency. These loans provide affordable, fixed interest rates on home loans, require a three percent down payment, include down payment and closing cost assistance, and allow for no or minimum insurance premiums. The bank offers home mortgage loans through Minnesota Rural Development. Low- and very low-income individuals and families living in rural areas can qualify for these loans. The loans in this program provide low, fixed-rate interest rates on home loans, are guaranteed by the United States Department of Agriculture, do not require a down payment, and include payment assistance to increase the applicant’s repayment ability. Merchants also offers Beginning Farmer loans through the Minnesota Rural Finance Authority to provide affordable credit to eligible farmers.

INVESTMENT TEST

The bank’s performance under the Investment Test in Minnesota is rated Needs to Improve.

Based on full-scope reviews, the bank’s performance in the MN non-MSA and Rochester MSA AAs is poor. Based on a full-scope review, the bank’s performance in the Twin Cities MSA is excellent.

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
MN Non-MSA	1	165	86	321	87	54.7	486	9.8	0	0
Twin Cities MSA	2	1,360	47	2,371	49	30.8	3,731	74.9	0	0
Rochester MSA	2	379	21	383	23	14.5	762	15.3	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.

MN Non-MSA

Merchants has few qualified CD investments that benefit the MN Non-MSA. Merchant's qualified investments and donations demonstrate poor responsiveness to needs and opportunities in the MN Non-MSA. The institution rarely uses innovative and/or complex investments to support CD initiatives in the AA.

Qualified investments and donations that benefit the MN Non-MSA total \$486 thousand for the evaluation period and represent 0.4 percent of allocated capital. During the evaluation period, Merchants made 86 donations totaling \$321 thousand that benefited the MN Non-MSA. The donations supported organizations providing services to LMI individuals, providing affordable housing, and promoting economic development within the AA. One donation provided \$50 thousand to an emergency loan fund to provide financial assistance to small local businesses directly affected by the COVID-19 pandemic. The bank also made two donations totaling \$1 thousand that benefited a broader regional area that includes the MN Non-MSA.

There was one prior period investment outstanding during the current evaluation period and benefited the MN Non-MSA. The prior period mortgage-backed security (MBS) investment had an outstanding balance of \$165 thousand at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA. The MBS is considered a complex investment.

Twin Cities MSA

Merchants has an excellent level of qualified CD investments that benefit the Twin Cities MSA. Merchant's qualified investments and donations demonstrate good responsiveness to needs and opportunities in the Twin Cities MSA. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments and donations total \$3.7 million for the evaluation period and represent 8.7 percent of allocated capital. During the evaluation period, Merchants purchased \$2.3 million in MBS that supported affordable housing in the Twin Cities MSA. Additionally, Merchants made 45 donations totaling \$63 thousand that benefited the Twin Cities MSA. The donations supported organizations providing services to LMI individuals within the AA.

There were two prior period MBS investments that were outstanding during the current evaluation period and benefited the AA. The prior period investments had an outstanding balance of \$1.4 million as of December 31, 2021. The MBS supported affordable housing for LMI families in the AA. The MBS are considered complex investments.

Rochester MSA

Merchants has a poor level of qualified CD investments that benefit the Rochester MSA. Merchant's qualified investments and donations demonstrate poor responsiveness to needs and opportunities in the Rochester MSA. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments and donations total \$762 thousand for the evaluation period and represent 2.8 percent of allocated capital. During the evaluation period, Merchants purchased one \$363 thousand MBS that supported affordable housing in the Rochester MSA. Additionally, Merchants made 20 donations totaling \$20 thousand that benefited the Rochester MSA. The donations primarily supported

organizations providing services to LMI individuals, and to a lesser extent supported organizations providing affordable housing and economic development within the AA. The bank also made ten donations totaling \$13 thousand that benefited a broader regional area that includes the Rochester MSA.

There were two prior period MBS investments outstanding during the current evaluation period and benefited the AA. The prior period investments had an outstanding balance of \$379 thousand as of December 31, 2021. The MBS supported affordable housing for LMI families in the AA. The MBS are considered complex investments.

SERVICE TEST

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

Based on full-scope reviews, the bank's performance in the MN non-MSA and Rochester MSA AAs is good and the Twin Cities MSA is adequate.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's MN Non-MSA and Rochester MSA AAs. Service delivery systems are reasonably accessible to portions of the Twin Cities AA, particularly LMI geographies and/or LMI individuals.

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	Upp	Low	Mod	Mid	Upp
MN non-MSA	63.7	11	50.0	0.0	18.2	72.7	9.1	0.0	3.0	67.6	29.4
Twin Cities MSA	22.2	7	31.8	0.0	0.0	85.7	14.3	0.0	7.4	50.6	42.0
Rochester MSA	14.1	4	18.2	0.0	25.0	25.0	50.0	0.0	25.9	38.4	35.8

Source: 2015 ACS data and 12/31/2021 bank data. The MN non-MSA AA population percentages are based on the AA delineation for 2020-2021. Due to rounding, totals may not equal 100.0%

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
MN non-MSA	2	0	0	0	+1	+1
Twin Cities MSA	0	1	0	-1	0	0
Rochester MSA	0	0	0	0	0	0

MN non-MSA

The bank's branches are readily accessible to geographies and individuals of different income levels in the MN Non-MSA. There are eight full-service branches and three limited-service branches in the MN Non-MSA as of December 31, 2021. The three limited-service branches are located at senior living communities in Winona. The senior living locations operated with limited hours one day per month in

2018 and 2019 and were temporarily closed in 2020 and 2021 due to the pandemic and lockdown required by Minnesota state government and the senior living facilities.

The Winona Lakeside full-service branch and the Winona Sugar Loaf Senior Living limited-service branch are located in moderate-income geographies. Of the remaining branches, eight are in middle-income CTs and one is in an upper-income CT. There are no low-income CTs in the AA. The branch distribution in moderate-income geographies at 18.2 percent compares favorably to demographic data that shows 3 percent of the population lives in a moderate-income geography. Excluding the limited-service branches, the branch distribution in moderate-income geographies at 12.5 percent is still higher than the demographic comparator.

There are two deposit-taking ATMs in Northfield that opened in May 2020 and both are located in middle-income geographies. There are no deposit-taking ATMs in moderate-income geographies.

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 opened two new branches each with a deposit-taking ATM in Northfield. The Northfield locations were added in May 2020 with the merger between FNB Northfield and Merchants. The Northfield Downtown branch is in an upper-income CT and the Northfield South branch is in a middle-income CT. There were no branch openings in LMI geographies. While there were no permanent branch closures during the evaluation period, the three limited-service branches located at senior living communities in Winona were temporarily closed in 2020 and 2021 due to the pandemic. The temporary branch closures generally do not affect accessibility to banking services. The senior living locations operated with limited hours one day per month during 2018 and 2019, prior to the pandemic. Two of those locations are in middle-income geographies and the Winona Sugar Loaf Senior Living branch is located in a moderate-income geography. The three full-service branches in Winona are near the senior living facilities and provided service to customers when those limited-service locations were not operating.

Hours vary slightly across the full-service branches but do not negatively impact accessibility. In 2018 and 2019, prior to the temporary closures, the senior living branches in Winona had reduced hours compared to the other branches. Since these senior living branches operate as a convenience to residents at the retirement community rather than the general public, it is reasonable that these branches had shorter hours. There are full-service branches nearby in Winona that customers can access during normal business hours.

Twin Cities MSA

The bank's branches are reasonably accessible to portions of the Twin Cities AA, particularly LMI geographies and/or LMI individuals. There are seven branches in the Twin Cities MSA as of December 31, 2021. Six branches are located in a middle-income CT and one is located in an upper-income CT. There are no low-income CTs in the AA. The bank has no branches in a moderate-income geography, which compares poorly to demographic data that indicates 7.4 percent of the population lives in moderate-income geographies. While there are no branches in moderate-income CTs, the Hastings and Rosemount branches are located near moderate-income CTs and are reasonably accessible to those areas and LMI individuals. There are no deposit-taking ATMs in the AA.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, there was one branch closing in the Twin Cities MSA.

The branch located at the Steeple Center Senior Living facility closed in April 2019. While this branch was located in a moderate-income CT, the closure did not materially affect accessibility for LMI people or the moderate-income geography. This was a limited-service branch that operated one hour each Tuesday and was mostly targeted to residents living at the retirement community. The full-service branch in Rosemount is located about a mile away and can serve customers in the area. The Highview Hills senior living community location temporarily closed in 2020 and 2021 due to the pandemic. The Highview Hills branch is in a middle-income geography. The full-service branch in Lakeville approximately three miles away remains open with normal business hours to assist customers that otherwise would have used the Highview Hills location. The bank did not open any locations in the Twin Cities MSA during the evaluation period. Additionally, there were no additions or removals of deposit taking ATMs in this AA during the evaluation period.

Lobby and drive-up hours at the full-service branches are generally similar within the AA and comparable to branches in other AAs. The senior living branch at Highview Hills had reduced hours compared to the other branches in 2018 and 2019 prior to its temporary closure. Since the senior living branch operates as a convenience to residents at the retirement community rather than the general public, it is reasonable that it had shorter hours. The full-service branch in Lakeville is nearby and customers can use that branch during normal business hours.

Rochester MSA

The bank's branches are readily accessible to geographies and individuals of different income levels in the Rochester MSA. There are four branches in the Rochester MSA. The Lanesboro branch is in a moderate-income CT. Of the remaining branches in the AA, the Rushford branch is located in a middle-income CT and both Rochester branches are located in upper-income CTs. There are no low-income CTs in the AA. The branch distribution in moderate-income geographies at 25 percent is near demographic data that indicates 25.9 percent of the population lives in moderate-income geographies. There are no deposit-taking ATMs in the AA.

The bank did not open or close any branches nor add or remove any deposit-taking ATMs in the Rochester MSA during the evaluation period.

Lobby and drive-up hours are similar between branches in the AA and comparable to branches in other AAs. Each of the four branches offer similar lobby service hours each weekday and three of the branches offer drive-up hours during normal weekday business hours and on Saturday morning. Merchants offers free checking and low-cost savings accounts at all branches, which benefit individuals including some LMI customers.

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period, 61 employees volunteered 1,859 hours to 39 different organizations that served the bank's MN AAs. Additionally, three employees provided 87 hours to three organizations that served broader areas, including portions of the bank's AAs in Minnesota. CD services supported affordable housing, community services for LMI individuals, and economic development. The bank's ability to provide CD services was negatively impacted by the pandemic and the associated lockdowns and restrictions that prevented volunteering at many organizations.

MN non-MSA

The institution provides an adequate level of CD services. During the evaluation period, 44 employees provided 1,151 service hours to 22 different organizations. CD services supported community services for LMI individuals and economic development.

The following are examples of some of the CD services provided to the MN Non-MSA during the evaluation period:

- Three employees served as Board or committee members for an organization that provides affordable housing to LMI families in Winona.
- One employee served as Vice President for an organization that offers free school supplies and clothing to children from LMI families in Winona County.
- Seven employees volunteered to build a Habitat for Humanity home that goes to an LMI family in Winona.

Twin Cities MSA

The institution provides a relatively high level of CD services. Ten employees provided 362 hours to ten organizations. The organizations provide community services to LMI individuals and support economic development. There were no services to organizations supporting affordable housing, which is a need in this AA.

The following are examples of some of the CD services provided to the Twin Cities MSA during the evaluation period:

- One employee served as a Board member for an organization that provides clothing and household supplies to LMI individuals in Washington County.
- One employee served as committee member for an organization that provides financing and technical assistance to small businesses in the Twin Cities.
- One employee served as a director for an organization providing community services, such as food, clothing, and school supplies, to LMI individuals in Hastings.

Rochester MSA

The institution provides a relatively high level of CD services. Seven employees served 347 hours to seven organizations. The organizations served provide affordable housing and community services to LMI individuals and promote economic development.

The following are examples of some of the CD services provided to the Rochester MSA during the evaluation period:

- One employee served as a tax counselor by assisting LMI individuals with free tax return preparation in Rochester.
- One employee served as Board member for an organization that provides grants and technical assistance to small businesses in Rushford.
- One employee provided financial literacy classes to inmates at a prison in Rochester.

State of Wisconsin

CRA rating for the State of Wisconsin³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Substantial Noncompliance

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in the AA.
- An excellent geographic distribution of loans in its AA.
- An adequate distribution of loans to borrowers of different income levels and businesses of different sizes.
- A very poor level of qualified investments and grants, exhibiting poor responsiveness to community needs.
- The bank's service delivery systems are unreasonably inaccessible to portions of the AA. There are no branches located in LMI geographies.
- An adequate level of CD services.

Description of Institution's Operations in Wisconsin

The bank has one AA (Eau Claire MSA) in Wisconsin consisting of Eau Claire County and the southwestern portion of Chippewa County within the Eau Claire, WI MSA. This AA includes six of 11 census tracts in Chippewa County and all 20 census tracts in Eau Claire County. The bank's operations in Wisconsin comprise 3.8 percent of total bank deposits, 4.2 percent of total bank branches, and 3.2 percent of bank loans.

There is a high level of competition for financial services in the Eau Claire MSA. As of June 30, 2021, FDIC deposit market share data shows 21 financial institutions operating 52 offices in the AA. Of those institutions, Merchants ranked 12th with 2.3 percent of the deposit market share. The top five institutions accounted for 63.7 percent of the deposit market share. These institutions include U.S. Bank N.A., Charter Bank, Northwestern Bank, Citizens Community Federal N.A., and Associated Bank N.A.

According to 2021 D&B data, service industries represented the largest portion of businesses at 41.4 percent; followed by retail trade at 15.7 percent, finance, insurance, and real estate at 8.5 percent, and non-classifiable establishments at 8.4 percent. In addition, 63.8 percent of AA businesses have four or fewer employees, and 84.1 percent operate from a single location.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2021 unemployment rate was 2.8 percent and 1.9 percent for Chippewa and Eau Claire Counties, respectively. Unemployment rates impacted by the pandemic peaked at 13.3 percent and 12.4 percent in April 2020 for Chippewa and Eau Claire Counties, respectively. As of December 2021, Eau Claire County compared favorably to the state of WI's 2.3 percent unemployment rate, but Chippewa County remained higher at 2.8 percent.

³ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

We reviewed three community contacts conducted in the AA during the evaluation period. Contacts included an economic development corporation, a community development financial institution (CDFI), and a real estate trade association. All contacts indicated the area suffers a housing shortage and a lack of affordable housing. Credit and community needs include affordable housing projects, home improvement or rehabilitation loan programs, credit products to build or repair credit histories, homeownership counseling, financial literacy courses, and start-up and small business lending.

The following table illustrates selected demographic characteristics of the Eau Claire MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Eau Claire MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	19.2	69.2	11.5	0.0
Population by Geography	134,586	0.0	16.7	67.9	15.3	0.0
Housing Units by Geography	57,099	0.0	18.1	68.6	13.3	0.0
Owner-Occupied Units by Geography	33,799	0.0	10.3	75.5	14.2	0.0
Occupied Rental Units by Geography	19,819	0.0	29.0	58.6	12.4	0.0
Vacant Units by Geography	3,481	0.0	32.3	58.3	9.4	0.0
Businesses by Geography	8,347	0.0	18.7	68.1	13.2	0.0
Farms by Geography	420	0.0	10.2	74.3	15.5	0.0
Family Distribution by Income Level	32,098	18.0	18.0	23.8	40.1	0.0
Household Distribution by Income Level	53,618	24.8	16.2	18.2	40.8	0.0
Median Family Income MSA - 20740 Eau Claire, WI MSA		\$66,688	Median Housing Value			\$152,880
			Median Gross Rent			\$729
			Families Below Poverty Level			7.3%
<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>						

Scope of Evaluation in Wisconsin

We completed a full-scope review of the Eau Claire MSA. Home mortgage received greater weighting in the AA as it accounted for significantly more loan volume. Merchants did not have sufficient volume of small loans to farms to perform meaningful analysis in the Eau Claire MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Based on a full-scope review, the bank’s performance in the Eau Claire MSA is good.

Lending Activity

Lending levels reflects good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Eau Claire MSA	310	143	4	0	457

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Eau Claire MSA	78,441	14,695	613	0	93,749

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$91.2 million in deposits with a deposit market share of 2.3 percent. The bank ranked 12th out of 21 banks in the AA.

According to the 2021 peer mortgage data, the bank ranked 15 out of 259 lenders, originating home mortgage loans in the AA. The bank's market share of 1.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. However, positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA.

According to the 2020 peer small business data, the bank ranked ninth out of 76 lenders originating small business loans in the AA. The bank's market share of 4 percent and rank in loans is stronger than the bank's market share and rank in deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent.

The proportion of loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and aggregate lending. There were no low-income geographies in the AA.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in moderate-income geographies was near to the percentage of businesses but exceeded aggregate lending. There were no low-income geographies in the AA.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified for the Eau Claire MSA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The borrower distribution of home mortgage loans is adequate considering performance context.

The proportion of loans to low-income borrowers was well below the percentage of low-income families and below aggregate lending. Aggregate lenders were similarly below the percentage of low-income families. With median family income of \$66,688, low-income borrowers earn less than \$33,344 a year. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$834 for low-income borrowers. Assuming a 30-year mortgage with a five 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 at the \$152,880 median housing value would be \$821. These costs are challenging and may limit lending opportunities for low-income families. The proportion of loans to moderate-income borrowers was below both the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is adequate.

The proportion of loans was well below the percentage of small businesses and below aggregate lending. Aggregate lenders were similarly well below demographics. The bank reported a high percentage of loans (60.1 percent) made to businesses with unreported revenue. This was attributed in part to the bank's participation in PPP lending.

Community Development Lending

Merchants did not originate any CD loans during the evaluation period, which had a negative impact on the lending performance considering credit and community needs in the AA.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve credit needs in the Eau Claire MSA AA.

INVESTMENT TEST

The bank’s performance under the Investment Test in Wisconsin is rated Substantial Noncompliance.

Based on a full-scope review, the bank’s performance in the Eau Claire MSA is very poor.

The institution has few, if any, qualified CD investments or grants, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Eau Claire MSA	0	0	18	28	18	100.0	28	100.0	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.

Merchant’s qualified investments and donations demonstrate poor responsiveness to needs and opportunities in the Eau Claire MSA. Qualified donations total \$28 thousand for the evaluation period and represent 0.3 percent of allocated capital. During the evaluation period, Merchants made 18 donations totaling \$28 thousand that benefited the Eau Claire AA. The donations supported organizations providing services to LMI individuals within the AA. There were no prior period investments outstanding during the current evaluation period and no new investments made during the evaluation period that benefited the Eau Claire MSA. Opportunities existed within the AA for CD investments and donations.

SERVICE TEST

The bank’s performance under the Service Test in Wisconsin is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Eau Claire MSA is adequate.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System		
Deposits	Branches	Population

Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Eau Claire MSA	100.0	1	100.0	0.0	0.0	100.0	0.0	0.0	16.7	67.9	15.3
<i>Source: 2015 ACS data and bank data. Due to rounding, totals may not equal 100.0%</i>											

The bank’s branches are unreasonably inaccessible to portions of the AA. There is one branch in the Eau Claire MSA, which is located in a middle-income geography. The Eau Claire branch is not in close proximity to LMI geographies. The branch distribution in moderate-income geographies compares poorly to demographic data that indicates 16.7 percent of the population lives in a moderate-income CT. There are no deposit-taking ATMs in the AA.

The bank did not open or close branches in the Eau Claire MSA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Lobby and drive-up hours are similar between all branches in the AA and comparable to branches in other AAs. The Eau Claire branch has lobby and drive-up service during normal business hours each weekday and drive-up hours on Saturday morning. Merchants offers free checking and low-cost savings accounts at all of its branches, which benefit individuals including some LMI customers.

Community Development Services

The institution provides an adequate level of CD services. Two employees provided 283 hours of services to three qualified CD organizations. The organizations provide community services to LMI individuals or promote economic development.

The following are examples of some of the CD services provided to the Eau Claire MSA during the evaluation period:

- One employee served on the Board of an organization that provides food and student mentoring services to LMI individuals in Eau Claire.
- One employee served as a chair of the Eau Claire City Revolving Loan fund that provides financing for small businesses in the area.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2018 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, small farm, CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
La Crosse-Onalaska, WI-MN MMSA		
La Crosse-Onalaska, WI-MN MMSA	Full-Scope	Houston (MN) and La Crosse (WI) Counties
Minnesota		
Minnesota Non-MSA	Full-Scope	Goodhue, portion of Rice (added 5/14/2020), and Winona Counties
Rochester MSA	Full-Scope	Olmsted County and portion of Fillmore County
Twin Cities MSA	Full-Scope	Portions of Dakota and Washington Counties
Wisconsin		
Eau Claire MSA	Full-Scope	Eau Claire County and portion of Chippewa County

Appendix B: Summary of MMSA and State Ratings

RATINGS		MERCHANTS BANK, N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Merchants Bank, N.A.	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
MMSA or State:				
LaCrosse-Onalaska, WI-MN MMSA	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
State of Minnesota	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
State of Wisconsin	High Satisfactory	Substantial Noncompliance	Low 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.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

La Crosse MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-21	
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	
La Crosse MMSA	1,731	317,097	100.0	7,047	0.3	0.9	0.9	6.4	5.1	7.4	73.7	78.2	72.0	19.2	15.7	19.2	0.4	0.4	0.5	
Total	1,731	317,097	100.0	7,047	0.3	0.9	0.9	6.4	5.1	7.4	73.7	78.2	72.0	19.2	15.7	19.2	0.4	0.4	0.5	

*Source: 2015 ACS; 01/01/2018 - 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																			2018-21	
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	
La Crosse MMSA	1,731	317,097	100.0	7,047	18.6	6.4	9.7	18.9	18.2	20.9	22.7	24.0	24.0	39.8	41.6	32.3	0.0	9.8	13.1	
Total	1,731	317,097	100.0	7,047	18.6	6.4	9.7	18.9	18.2	20.9	22.7	24.0	24.0	39.8	41.6	32.3	0.0	9.8	13.1	

*Source: 2015 ACS; 01/01/2018 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-21
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
La Crosse MMSA	1,206	154,440	100.0	1,623	9.7	4.7	9.3	13.4	11.1	12.4	64.9	76.9	64.5	11.1	7.1	13.3	0.9	0.1	0.4
Total	1,206	154,440	100.0	1,623	9.7	4.7	9.3	13.4	11.1	12.4	64.9	76.9	64.5	11.1	7.1	13.3	0.9	0.1	0.4

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-21
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	
La Crosse MMSA	1,206	154,440	100.0	1,623	78.1	46.1	37.7	7.1	28.9	14.8	25.0	
Total	1,206	154,440	100.0	1,623	78.1	46.1	37.7	7.1	28.9	14.8	25.0	

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018-21

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
La Crosse MMSA	412	32,834	100.0	175	0.6	0.2	0.6	2.0	0.2	0.6	87.8	99.3	96.6	9.3	0.2	2.3	0.4	0.0	0.0
Total	412	32,834	100.0	175	0.6	0.2	0.6	2.0	0.2	0.6	87.8	99.3	96.6	9.3	0.2	2.3	0.4	0.0	0.0

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018-21

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
La Crosse MMSA	412	32,834	100.0	175	96.9	88.6	62.3	1.5	10.2	1.7	1.2
Total	412	32,834	100.0	175	96.9	88.6	62.3	1.5	10.2	1.7	1.2

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Minnesota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-19
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
MN non-MSA	1,388	176,233	100.0	3,286	0.0	0.0	0.0	5.1	7.6	4.6	72.1	75.4	77.1	22.7	16.9	18.3	0.0	0.0	0.0
Total	1,388	176,233	100.0	3,286	0.0	0.0	0.0	5.1	7.6	4.6	72.1	75.4	77.1	22.7	16.9	18.3	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2018 - 12/31/2019 Bank Data, 2019 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																			2020-21
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
MN non-MSA	1,939	316,488	100.0	6,527	0.0	0.0	0.0	4.0	4.9	2.9	62.5	70.9	61.3	33.5	24.2	35.8	0.0	0.0	0.0
Total	1,939	316,488	100.0	6,527	0.0	0.0	0.0	4.0	4.9	2.9	62.5	70.9	61.3	33.5	24.2	35.8	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2020 - 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																			2018-21		
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		
Rochester MSA	1,158	196,149	51.1	9,330	0.0	0.0	0.0	21.1	23.2	19.4	39.3	44.1	37.6	39.6	32.6	43.0	0.0	0.0	0.0		
Twin Cities MSA	1,110	213,924	48.9	24,751	0.0	0.0	0.0	5.5	8.5	4.2	51.2	58.8	52.8	43.3	32.7	42.9	0.0	0.0	0.0		
Total	2,268	410,073	100.0	34,081	0.0	0.0	0.0	11.1	16.0	8.4	46.9	51.3	48.7	41.9	32.7	43.0	0.0	0.0	0.0		

*Source: 2015 ACS; 01/01/2018 - 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																			2018-19		
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		
MN non-MSA	1,388	176,233	100.0	3,286	14.9	7.0	5.4	16.5	14.8	19.0	22.2	22.9	21.7	46.4	44.4	39.4	0.0	10.9	14.5		
Total	1,388	176,233	100.0	3,286	14.9	7.0	5.4	16.5	14.8	19.0	22.2	22.9	21.7	46.4	44.4	39.4	0.0	10.9	14.5		

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21		
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		
MN non-MSA	1,939	316,488	100.0	6,527	14.4	7.3	5.0	15.6	19.8	17.2	21.9	24.3	24.8	48.0	42.1	38.7	0.0	6.6	14.4		
Total	1,939	316,488	100.0	6,527	14.4	7.3	5.0	15.6	19.8	17.2	21.9	24.3	24.8	48.0	42.1	38.7	0.0	6.6	14.4		

*Source: 2015 ACS; 01/01/2020 - 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																			2018-21		
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		
Rochester MSA	1,158	196,149	51.1	9,330	18.2	12.8	11.6	17.6	25.6	23.9	23.1	22.5	20.2	41.0	33.2	32.1	0.0	5.9	12.2		
Twin Cities MSA	1,110	213,924	48.9	24,751	13.6	7.7	6.7	15.9	20.2	20.0	24.2	24.7	24.4	46.4	40.6	31.8	0.0	6.8	17.2		
Total	2,268	410,073	100.0	34,081	15.2	10.3	8.0	16.5	23.0	21.0	23.8	23.5	23.3	44.5	36.9	31.9	0.0	6.3	15.8		

*Source: 2015 ACS; 01/01/2018 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2018-19		
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			
MN non-MSA	578	85,660	100.0	1,424	0.0	0.0	0.0	4.9	11.1	5.8	76.0	73.4	76.1	19.1	15.6	18.2	0.0	0.0	0.0			
Total	578	85,660	100.0	1,424	0.0	0.0	0.0	4.9	11.1	5.8	76.0	73.4	76.1	19.1	15.6	18.2	0.0	0.0	0.0			

*Source: 2019 D&B Data; 01/01/2018 - 12/31/2019 Bank Data; 2019 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																				2020-21		
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			
MN non-MSA	1,454	148,923	100.0	2,192	0.0	0.0	0.0	3.4	7.4	5.6	65.0	67.8	65.0	31.6	24.8	29.5	0.0	0.0	0.0			
Total	1,454	148,923	100.0	2,192	0.0	0.0	0.0	3.4	7.4	5.6	65.0	67.8	65.0	31.6	24.8	29.5	0.0	0.0	0.0			

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 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																			2018-21		
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		
Rochester MSA	772	94,069	45.8	2,692	0.0	0.0	0.0	25.2	41.3	24.1	39.5	37.7	40.8	35.3	21.0	35.1	0.0	0.0	0.0		
Twin Cities MSA	912	104,711	54.2	4,633	0.0	0.0	0.0	7.2	9.1	6.1	49.9	61.3	50.5	42.9	29.6	43.4	0.0	0.0	0.0		
Total	1,684	198,780	100.0	7,325	0.0	0.0	0.0	13.8	23.9	12.7	46.0	50.5	46.9	40.1	25.7	40.3	0.0	0.0	0.0		

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-19	
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		
MN non-MSA	578	85,660	100.0	1,424	81.8	54.3	51.9	6.2	33.7	11.9	11.9		
Total	578	85,660	100.0	1,424	81.8	54.3	51.9	6.2	33.7	11.9	11.9		

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
MN non-MSA	1,454	148,923	100.0	2,192	85.5	25.4	42.8	4.8	16.5	9.7	58.0
Total	1,454	148,923	100.0	2,192	85.5	25.4	42.8	4.8	16.5	9.7	58.0

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-21
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
Rochester MSA	772	94,069	45.8	2,692	85.6	40.8	50.0	3.8	23.4	10.5	35.8
Twin Cities MSA	912	104,711	54.2	4,633	91.3	35.2	48.6	2.5	21.7	6.2	43.1
Total	1,684	198,780	100.0	7,325	89.2	37.8	49.1	3.0	22.5	7.8	39.7

*Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-19	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
MN non-MSA	352	35,055	100.0	577	0.0	0.0	0.0	0.4	0.0	0.2	59.6	63.4	72.6	40.1	36.6	27.2	0.0	0.0	0.0	
Total	352	35,055	100.0	577	0.0	0.0	0.0	0.4	0.0	0.2	59.6	63.4	72.6	40.1	36.6	27.2	0.0	0.0	0.0	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
MN non-MSA	386	34,699	100.0	630	0.0	0.0	0.0	0.7	0.0	0.0	49.3	65.5	70.3	50.0	34.5	29.7	0.0	0.0	0.0	
Total	386	34,699	100.0	630	0.0	0.0	0.0	0.7	0.0	0.0	49.3	65.5	70.3	50.0	34.5	29.7	0.0	0.0	0.0	

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Rochester MSA	442	43,454	83.9	370	0.0	0.0	0.0	26.0	50.7	26.2	45.5	46.6	59.5	28.5	2.7	14.3	0.0	0.0	0.0
Twin Cities MSA	85	7,831	16.1	94	0.0	0.0	0.0	3.8	0.0	0.0	57.7	83.5	77.7	38.5	16.5	22.3	0.0	0.0	0.0
Total	527	51,285	100.0	464	0.0	0.0	0.0	14.4	42.5	20.9	51.9	52.6	63.1	33.7	4.9	15.9	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018-19
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
MN non-MSA	352	35,055	100.0	577	97.7	89.2	70.7	1.8	8.8	0.5	2.0	
Total	352	35,055	100.0	577	97.7	89.2	70.7	1.8	8.8	0.5	2.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MN non-MSA	386	34,699	100.0	630	98.2	81.9	66.0	1.5	3.9	0.4	14.2
Total	386	34,699	100.0	630	98.2	81.9	66.0	1.5	3.9	0.4	14.2

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Rochester MSA	442	43,454	83.9	370	97.9	88.5	69.2	1.2	7.0	0.9	4.5
Twin Cities MSA	85	7,831	16.1	94	97.5	56.5	41.5	1.6	17.6	0.9	25.9
Total	527	51,285	100.0	464	97.7	83.3	63.6	1.4	8.7	0.9	8.0

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Wisconsin

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-21		
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 MSA	310	78,441	100.0	7,410	0.0	0.0	0.0	10.3	24.8	10.6	75.5	62.6	74.4	14.2	12.6	15.0	0.0	0.0	0.0		
Total	310	78,441	100.0	7,410	0.0	0.0	0.0	10.3	24.8	10.6	75.5	62.6	74.4	14.2	12.6	15.0	0.0	0.0	0.0		

Source: 2015 ACS; 01/01/2018 - 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																			2018-21		
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		
Eau Claire MSA	310	78,441	100.0	7,410	18.0	5.2	8.8	18.0	12.3	21.6	23.8	17.1	24.7	40.1	29.4	32.1	0.0	36.1	12.9		
Total	310	78,441	100.0	7,410	18.0	5.2	8.8	18.0	12.3	21.6	23.8	17.1	24.7	40.1	29.4	32.1	0.0	36.1	12.9		

Source: 2015 ACS; 01/01/2018 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2018-21		
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			
Eau Claire MSA	143	14,695	100.0	1,424	0.0	0.0	0.0	18.7	17.5	14.8	68.1	65.7	69.3	13.2	16.8	15.9	0.0	0.0	0.0			
Total	143	14,695	100.0	1,424	0.0	0.0	0.0	18.7	17.5	14.8	68.1	65.7	69.3	13.2	16.8	15.9	0.0	0.0	0.0			

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-21	
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		
Eau Claire MSA	143	14,695	100.0	1,424	79.0	29.4	41.5	6.3	10.5	14.8	60.1		
Total	143	14,695	100.0	1,424	79.0	29.4	41.5	6.3	10.5	14.8	60.1		

Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Eau Claire MSA	4	613	100.0	52	0.0	0.0	0.0	10.2	0.0	9.6	74.3	50.0	76.9	15.5	50.0	13.5	0.0	0.0	0.0	
Total	4	613	100.0	52	0.0	0.0	0.0	10.2	0.0	9.6	74.3	50.0	76.9	15.5	50.0	13.5	0.0	0.0	0.0	

*Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Eau Claire MSA	4	613	100.0	52	95.5	75.0	26.9	3.3	0.0	1.2	25.0		
Total	4	613	100.0	52	95.5	75.0	26.9	3.3	0.0	1.2	25.0		

*Source: 2021 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*