BANK OF ONTARIO

COMMUNITY REINVESTMENT ACT STATEMENT

9/22/2020

BANK OF ONTARIO

315 MAIN ST ONTARIO. WI 54651 608-337-4406 Census Tract 9602

LOBBY HOURS:

MONDAY TO THURSDAY - 9:00 A.M. TO 4:00 P.M.

FRIDAY - 9:00 A.M. TO 6:00 P.M.

DRIVE-UP HOURS:

MONDAY TO THURSDAY - 9:00 A.M. TO 5:00 P.M.

FRIDAY - 9:00 A.M. TO 6:00 P.M.

GENOA STATE BANK

700 MAIN ST GENOA. WI 54632 608-689-2655 Census Tract 9607

LOBBY HOURS:

MONDAY TO THURSDAY- 8:00 A.M. TO 3:00 P.M.

FRIDAY - 8:00 A.M. TO 6:00 P.M.

DRIVE-UP HOURS:

MONDAY TO THURSDAY - 8:00 A.M. TO 5:00 P.M.

FRIDAY - 8:00 A.M. TO 6:00 P.M.

WESTBY STATE BANK

100 N. MAIN ST WESTBY. WI 54667 608-634-6600 Census Tract 9603

LOBBY HOURS:

MONDAY TO THURSDAY- 8:30 A.M. TO 4:00 P.M.

FRIDAY - 8:30 A.M. TO 6:00 P.M.

WALK-UP HOURS:

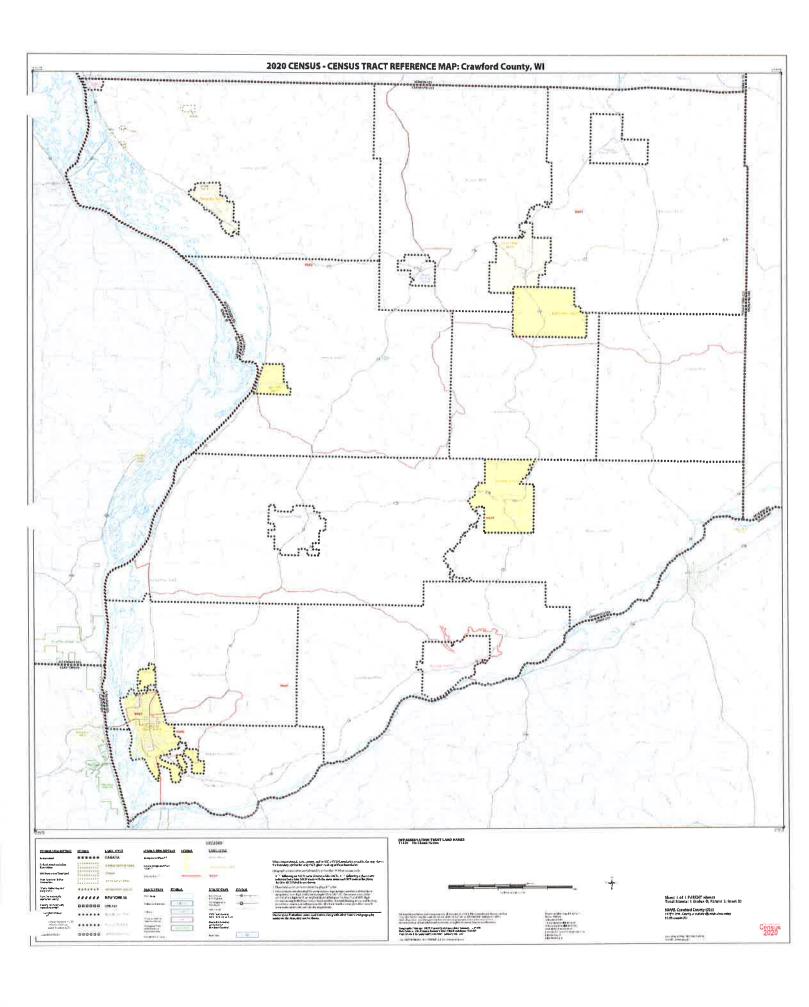
MONDAY TO THURSDAY - 8:00 A.M. TO 8:30 A.M and 4:00 P.M. TO 5:00 P.M.

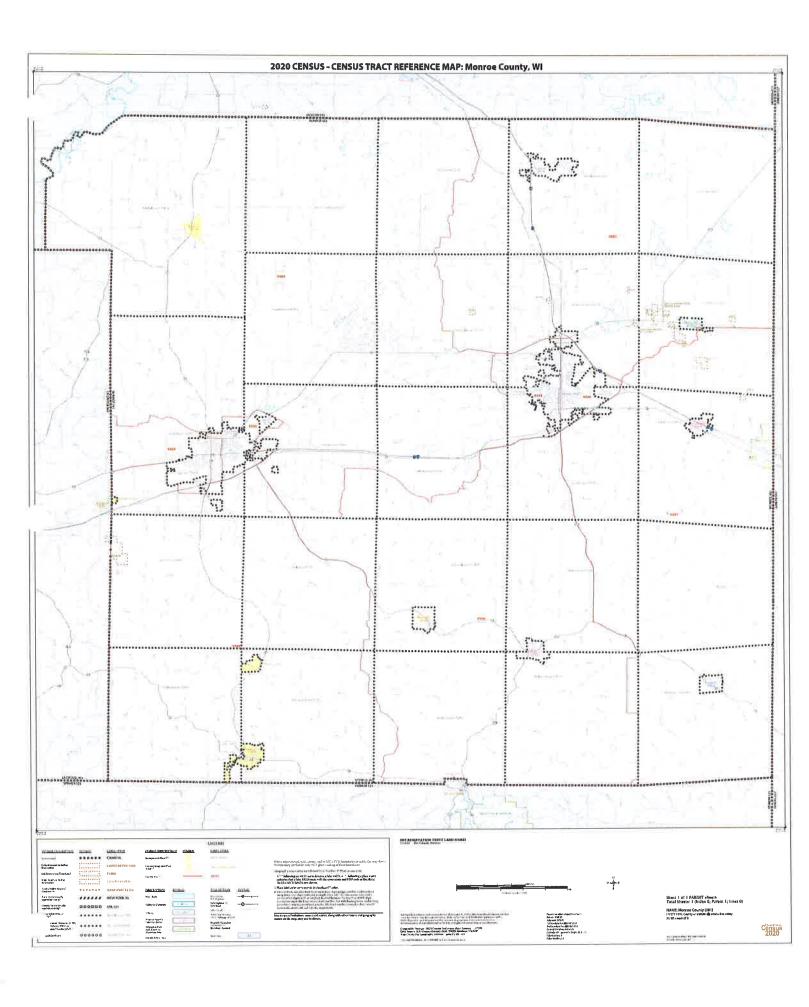
The specific Types of credit offered by this institution:

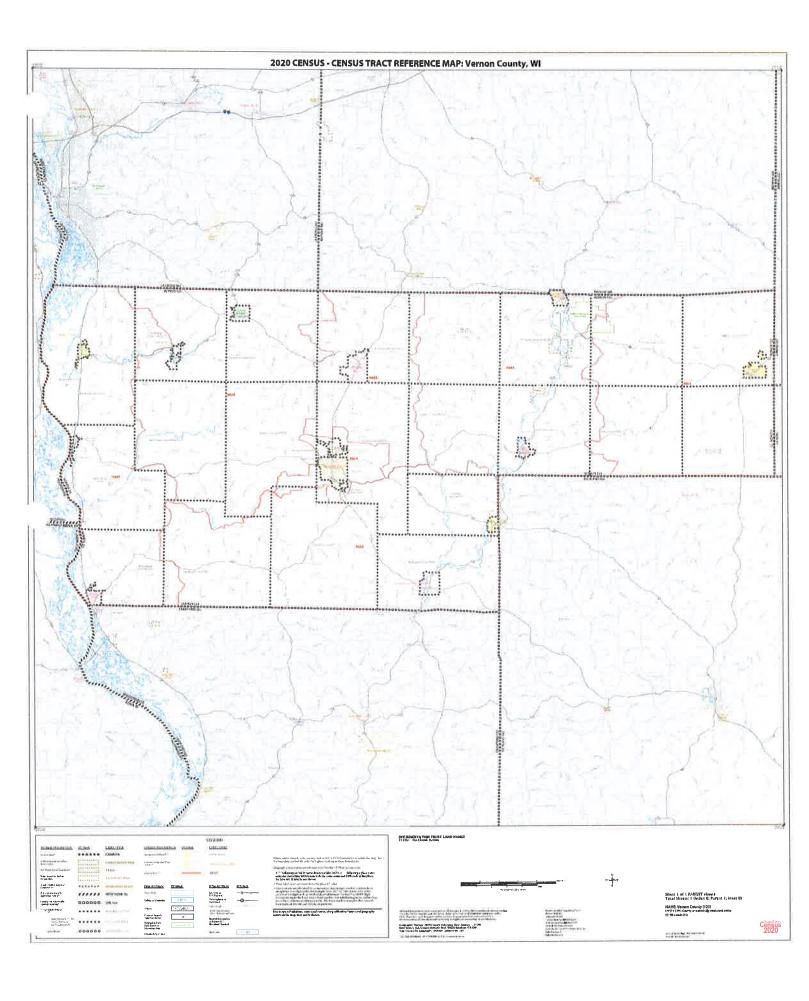
- Residential Loans
- Residential Loans for One to Four Family Units
- Commercial Buildings
- Home Improvement Loans
- Farm Loans Real Estate and Personal Property
- Community Development Loans
- Consumer Loans

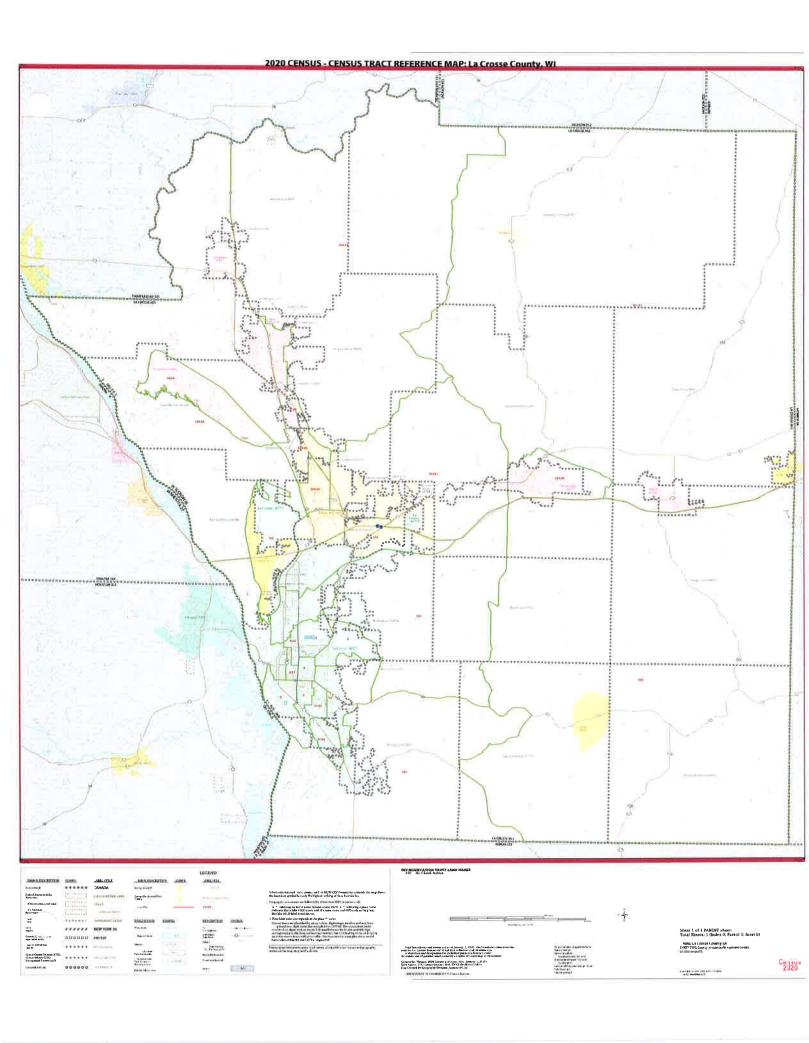
The specific Types of Deposit Products offered by this institution:

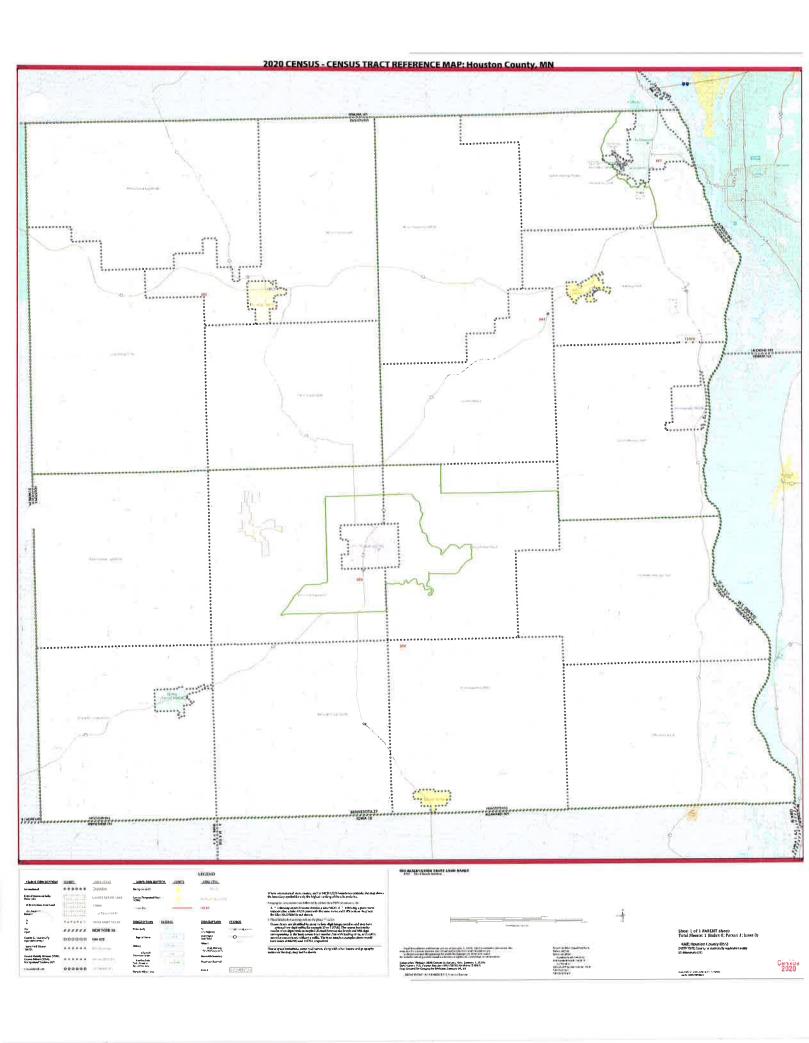
- Savings Accounts
- Checking Accounts
- NOW Accounts (Interest bearing Account)
- Money Market Checking Account (MMDA) (Interest bearing Account)
- Individual Retirement Accounts (IRA)
- Health Savings Account (HSA)
- Time Deposit Accounts (CDs-Certificate of Deposit)











2023 Quarterly Loan-to-Deposit Ratios

1st Quarter – 105.21%

2nd Quarter – 110.59%

3rd Quarter – 105.87%

4th Quarter – 107.21%

2022 Quarterly Loan-to-Deposit Ratios

1st Quarter – 102.34%

2nd Quarter – 108.66%

3rd Quarter – 108.96%

4th Quarter – 107.41%

2021 Quarterly Loan-to-Deposit Ratios

1st Quarter – 96.72%

2nd Quarter – 103.30%

3rd Quarter – 103.05%

4th Quarter – 104.87%

2020 Quarterly Loan-to-Deposit Ratios

1st Quarter – 102.48%

2nd Quarter - 101.25%

3rd Quarter – 104.07%

4th Quarter – 102.33%

2019 Quarterly Loan-to-Deposit Ratios

1st Quarter – 96.11%

2nd Quarter – 101.46%

3rd Quarter – 110.72%

4th Quarter – 102.77%

Fee Schedule

Money Order

\$100.00 or less - \$1.00 fee \$100.00 to \$300.00 - \$2.00 fee \$301.00 to \$1000.00 - \$3.00 fee Over \$1,000.00 - \$5.00 fee

- Replace Debit Card \$40.00
- Debit Card, Annual fee \$15.00
- Check Printing

Fee depends on style of check ordered

Overdraft (each overdraft paid); per item, no limit - \$25.00

All overdrafts created by check, in-person withdrawal, or other electronic means, as applicable.

Overdraft (each overdraft returned); per item, no limit - \$25.00

All overdrafts created by check, in-person withdrawal, or other electronic means, as applicable.

- Deposited Checks Returned Unpaid \$25.00
- Account Activity Printout \$1.00
- Account Research (per hour) \$35.00
- Account Balancing Assistance (per hour) \$35.00 (\$35.00 minimum)
- Copy of Statement \$1.00
- Stop Payment (per item) \$25.00
- Wire Transfer (outgoing) \$30.00
- International Wire (US Currency) \$55.00
- Tax Levy \$50.00
- Dormant Account (per month) \$0.50

An account is dormant if for two years;

There have been no deposits or withdrawals to the account.

There has been no communication about the account.

There has been no communication about any account.

Account statements returned for an incorrect address.

*Under age 18, no monthly service charge

Coin Counting (% of amount counted) - 10%

Non-Customers Only (No Charge for Customers)

- Non-Customer Check Cashing (% of Check Face Value) -5%
- Fax Outgoing 1st page \$5.00
- Fax Outgoing Additional Pages \$1.00
- Fax Incoming Each Page \$1.00
- Photocopies (per page) \$0.25
- Notary Service (each document) \$0.50
- Debit/ATM Card \$2,000.00

Maximum dollar amount in transaction per day

BANK OF ONTARIO

GENOA STATE BANK

COMMUNITY REINVESTMENT ACT STATEMENT

3/31/09

BANK OF ONTARIO

315 MAIN ST ONTARIO. WI 54651 608-337-4406 Census Tract 9602

LOBBY HOURS:

MONDAY TO THURSDAY - 9:00 A.M. TO 4:00 P.M.

FRIDAY - 9:00 A.M. TO 6:00 P.M.

DRIVE-UP HOURS:

MONDAY TO THURSDAY - 9:00 A.M. TO 5:00 P.M.

FRIDAY - 9:00 A.M. TO 6:00 P.M.

GENOA STATE BANK

700 MAIN ST GENOA. WI 54632 608-689-2655 Census Tract 9607

LOBBY HOURS:

MONDAY TO THURSDAY-8:00 A.M. TO 3:00 P.M.

FRIDAY - 8:00 A.M. TO 6:00 P.M.

DRIVE-UP HOURS:

MONDAY TO THURSDAY - 8:00 A.M. TO 5:00 P.M.

FRIDAY - 8:00 A.M. TO 6:00 P.M.

The specific Types of credit offered by this institution:

- Residential Loans
- Residential Loans for One to Four Family Units
- Commercial Buildings
- Home Improvement Loans
- Farm Loans Real Estate and Personal Property
- Community Development Loans
- Consumer Loans

The specific Types of Deposit Products offered by this institution:

- Savings Accounts
- Checking Accounts
- NOW Accounts (Interest bearing Account)
- Money Market Checking Account (MMDA) (Interest bearing Account)
- Individual Retirement Accounts (IRA)
- Health Savings Account (HSA)
- Time Deposit Accounts (CDs-Certificate of Deposit)

COMMUNITY REINVESTMENT ACT NOTICE

Bank of Ontario

315 Main St P.O. Box 9 Ontario, WI 54651 Phone (608) 337-4406 Fax (608)337-4210

Genoa State Bank

700 Main St P.O. Box 9 Genoa, WI 54632 Phone (608) 689-2655 Fax (608) 689-2600

Westby State Bank

100 N Main St P.O. Box 100 Westby, WI 54667 Phone (608) 634-6600 Fax (608) 634-6603

Under the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Manager, Division of Compliance and Consumer Affairs, FDIC, 300 S. Riverside Plaza, Suite 1700 Chicago, IL 60606. You may send written comments about our performance in helping to meet community credit needs to Doreen M. Dahl, President, P.O. Box 9, Ontario, WI 54651 and the FDIC Regional Manager. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Manager, You may also request from the FDIC Regional Manager an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Ontario Bancorporation, Inc., a bank holding company. You may request from the Exec. Vice President, Federal Reserve Bank of Chicago, District No. 7, 230 South LaSalle Street, Chicago IL 60604, an announcement of applications covered by the CRA filed by bank holding companies.

PUBLIC DISCLOSURE

December 31, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Ontario Certificate Number: 21085

315 Main Street Ontario, Wisconsin 54651

Federal Deposit Insurance Corporation Division of Depositor and Consumer Protection Chicago Regional Office

300 South Riverside Plaza, Suite 1700 Chicago, Illinois 60606

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, nor should it 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Outstanding**.

An institution in this group has an outstanding record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank made a majority of its home mortgage, small farm, and small business loans in the assessment area.
- The distribution of loans to borrowers reflects excellent penetration of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank's assessment area did not contain low- or moderate-income census tracts; therefore, the geographic distribution did not affect the rating.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.
- The institution's investment record enhances credit availability in its assessment area. The institution made two community development qualified investments.

DESCRIPTION OF INSTITUTION

Bank of Ontario is headquartered in Ontario, Wisconsin, and is wholly-owned by Ontario Bancorporation, Inc., a one-bank holding company. The bank does not have any affiliates or subsidiaries that offer lending products. The Federal Deposit Insurance Corporation rated the bank "Satisfactory" at its last CRA review on December 15, 2014, using the Interagency Small Institution Examination Procedures.

The bank primarily serves Vernon, Crawford, and Monroe Counties and has three banking offices, which includes the main branch in Vernon County. The other two branches are located in the cities of Genoa and Westby in Vernon County. The bank opened the Westby branch on September 22, 2020. The three banking locations are located in middle-income census tracts. The bank has not been involved in any mergers or acquisitions since the previous evaluation.

The bank's primary business emphasis is home mortgage lending with a secondary focus on agricultural and commercial lending. Loan products offered consist of residential real estate loans, agricultural and commercial loans, and general consumer loans. The bank's loan products include involvement in Farm Services Agency loans, a special loan program that targets small farms.

Bank of Ontario offers a variety of deposit products including checking, savings, certificates of deposit, individual retirement, health savings, and money market accounts. The deposit accounts include a no service charge checking account. The bank operates five non-deposit taking Automated Teller Machines, with one located at the main office, one at the Westby branch, and three others in a local gas station and restaurants. Alternative banking services include online

mortgage applications, internet banking, mobile banking, and 24-hour toll-free telephone banking service. Banking hours and services throughout the evaluation period have been reasonable, with accessibility to all portions of the assessment area. Credit insurance is available at all locations for non-mortgage consumer and commercial purpose lending through bank-owned DelMedico Insurance.

According to the September 30, 2020, Call Report, the bank had \$54.4 million in total assets, \$46.5 million in total loans, \$4.7 million in total securities, and \$44.7 million in total deposits. There have not been any material changes to the bank's financial condition since the previous evaluation. The following table details the bank's loan distributions as of the September 30, 2020, Call Report.

Loan Portfolio Distribution as	JI 9/30/2020	
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	0	0.0
Secured by Farmland	12,097	26.0
Secured by 1-4 Family Residential Properties	15,666	33.7
Secured by Multifamily (5 or more) Residential Properties	0	0.0
Secured by Nonfarm Nonresidential Properties	8,415	18.1
Total Real Estate Loans	36,178	77.8
Commercial and Industrial Loans	3,184	6.8
Agricultural Production and Other Loans to Farmers	3,956	8.5
Consumer Loans	2,139	4.6
Obligations of State and Political Subdivisions in the U.S.	1,028	2.2
Other Loans	31	0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	17	0.0
Total Loans	46,499	100.0

Examiners did not identify not any financial, legal, or other impediments that would limit the institution's ability to meet the credit needs of its assessment area.

DESCRIPTION OF ASSESSMENT AREA

The bank's assessment area includes 12 contiguous census tracts within the State of Wisconsin. Seven of the census tracts are located in Vernon County, two tracts are located in Crawford County, and three tracts are located in Monroe County. All of the tracts are part of the non-metropolitan portion of Wisconsin. Although the assessment area delineation has not changed since the prior examination, the income designations of certain census tracts changed slightly based on updated census data determined by the 2015 American Community Survey (ACS). The changes are discussed in the following section. The assessment area includes whole geographies and does not arbitrarily exclude low- or moderate-income census tracts. Sources of the data used in this section are as follows: FFIEC, 2015 ACS, 2010 U.S. Census, U.S. Department of Agriculture 2017 Census, 2019 D&B

data, U.S. Bureau of Labor Statistics, Moody's Analytics, Wisconsin Department of Workforce Development, Wisconsin Realtors Association, and other readily available public information.

Economic and Demographic Data

According to the income designations derived from 2015 ACS, all 12 census tracts are middle-income. At the prior examination and based on 2010 U.S. Census data, there were two moderate-income and ten middle-income census tracts. See the following table for demographic data for the assessment area.

Demogra	phic Inform	nation of th	e Assessment	Area		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	0.0	100.0	0.0	0.0
Population by Geography	49,615	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	22,467	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	15,197	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	3,753	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	3,517	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	2,674	0.0	0.0	100.0	0.0	0.0
Farms by Geography	602	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	13,084	19.3	18.8	24.3	37.7	0.0
Household Distribution by Income Level	18,950	22.6	16.0	19.7	41.7	0.0
Median Family Income Non-MSAs – WI		\$60,742	Median Hous	ing Value		\$141,579
			Median Gross	s Rent		\$643
			Families Belo	w Poverty L	evel	9.8%

Source: 2015 ACS and 2019 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.

According to the 2015 ACS, there are 22,467 housing units in the assessment area. Of these, 67.6 percent are owner-occupied, 16.7 percent are occupied rental units, and 15.7 percent are vacant. Approximately 85.9 percent of the housing units are 1-4 family units, 10.1 percent are mobile homes or trailers, and 4.0 percent are multifamily units.

The Wisconsin Realtors Association provides information on number of home sales and median sales price by county. This information, which follows, provides insight into the housing market availability and credit needs; as well as the potential affordability of the housing to low- and moderate-income borrowers.

Housing Sales and Median Prices by County							
County	2019 Year- End Sales	2019 Median Sales Price	Additional Information (Trend)				
Crawford	192	\$135,500	Prior year-end: 168 sales at median price of \$129,250				
Monroe	525	\$161,000	Prior year-end: 520 sales at median price of \$147,600				
Vernon	266	\$166,500	Prior year-end: 291 sales at median price of \$153,000				

For the housing units in the assessment area, 16.7 percent have monthly owner costs exceeding 30.0 percent of income and 5.7 percent had monthly renter costs exceeding 30.0 percent of income according to 2015 ACS data. This indicates that the housing is relatively affordable in the assessment area as a whole. Examiners used the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. Presented below is the low-, moderate-, middle- and upper-income categories for each year.

	Medi	ian Family Income Range	s	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
	WI NA N	Median Family Income (99	9999)	
2019 (\$65,900)	<\$32,950	\$32,950 to <\$52,720	\$52,720 to <\$79,080	≥\$79,080

Data obtained from the U.S. Department of Agriculture, 2017 Census, reflects the following statistics for assessment area farms. This information gives an indication of farm size and values for the area and number of farms for potential lending opportunities.

Wisconsin Assessment Area Farm Statistics							
rket Value of Products Sold	rage Per Cash Inc	age Size	A	# Farms	County		
,965	\$16,49	204		1,034	Crawford		
),380	\$34,0	193		1,555	Monroe		
,577	\$21,7	172		1,961	Vernon		
_		172	sus; d	1,961			

In addition, according to 2019 D&B data, there were 2,674 businesses in the assessment area. The assessment areas' largest industry sectors by number of entities are services (30.9 percent) and Agriculture, Forestry, and Fishing (18.4 percent). In addition, 71.5 percent of area businesses have four or fewer employees, and 90.1 percent of businesses operate from a single location. According to Wisconsin Department of Workforce Development and bank management, large employers in the assessment area include numerous area school districts, Vernon Memorial Healthcare, Organic Valley, and Gunderson Health Systems.

Data obtained from the U.S. Bureau of Labor Statistics reflects that the 2019 year-end unemployment rate was 3.5 percent for the state of Wisconsin. At this same time, the assessment areas' counties had unemployment rates as follows: Crawford, 4.3 percent; Monroe, 3.0 percent;

and Vernon, 3.3 percent. For most of the evaluation period, the unemployment rate was fairly steady and low. However, the current 2020 COVID-19 Pandemic has resulted in a turbulent year for unemployment cases, causing a significant increase in unemployment rates for the assessment areas' counties, which mirrors the impact across the state and nation. The highest unemployment spike during the evaluation period appeared in April 2020, when the Wisconsin rate reached 13.6 percent. At this same time, the unemployment rates for each of the assessment areas' counties were as follows: Crawford, 17.9 percent; Monroe, 12.1 percent; and Vernon, 10.9 percent. The Pandemic crisis, resulting in forced business closures or significantly reduced/altered services and high unemployment rates, has caused a need for more flexible financing and loan servicing programs during 2020. As the Pandemic continued from April 2020, the state and county unemployment rates steadily declined to the most current available October unemployment rates: State, 4.9 percent; Crawford, 4.5 percent; Monroe, 4.3 percent; and Vernon, 3.7 percent.

Competition

The assessment area has a moderate level of competition in the market for financial services. As of June 30, 2020, the FDIC Deposit Market Share data reflects 15 financial institutions operating 42 offices within the counties comprising the assessment area. Of these, Bank of Ontario ranked twelfth, with a deposit market share of approximately 2.4 percent.

There is also a moderate level of competition for home mortgage loans among the various banks, credit unions, and non-depository mortgage lenders within and near the assessment areas. This bank is not required to collect or report home mortgage loans pursuant to the requirements of the Home Mortgage Disclosure Act (HMDA). However, this information is useful as an indicator of the level of demand and opportunities for home mortgage lending within the assessment areas, and is therefore included here. The aggregate data only includes loans originated by reporting financial institutions. HMDA aggregate data for 2019 shows 171 institutions reported 1,323 home mortgage loans in the assessment area.

The bank is not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans does not include comparisons to aggregate data. The aggregate data, however, is an indicator of the level of demand and opportunities for small business loans and is therefore included here. The aggregate data only includes loans originated by reporting banks. Aggregate data for 2018 (the most current year available) shows that 52 institutions reported 980 small business loans in the assessment area, indicating a moderate degree of competition for this product.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit needs. This information helps determine whether local financial institutions are responsive to these needs.

Examiners used information from a previous contact from a director of a small business development center that serves Wisconsin's Buffalo, Jackson, Juneau, La Crosse, Monroe, Trempealeau, and Vernon Counties.

The contact noted that the rural and sparsely populated characteristics and the aging population of many of the counties in this part of Wisconsin presents unique challenges for lending. The contact specified that many businesses were struggling to withstand the recession a decade ago, but in 2019 as the economy stabilized, baby boomer business owners are transitioning focus to succession planning and retirement. This transition has led to individuals seeking credit to purchase businesses from retiring business owners. The contact identified a notable level of opportunity for lending to these prospective business owners, to entrepreneurs, and start-up businesses in the area. Further, they noted that banks should be more aware of resources and programs available designed to cover the funding gaps that many small businesses experience. Making use of these programs should allow prospective borrowers to improve creditworthiness and ultimately allow banks to extend more credit to small businesses. The contact further stated there is a continuous need for small business educational programs and consulting services for new and prospective business owners and entrepreneurs, including education on obtaining credit. The contact indicated that financial institutions have been responsive to the credit needs in the area as a whole.

Credit Needs

Considering information from bank management, demographic and economic data, and the community contact, examiners determined that there are credit and community development needs for small farm, small businesses, and affordable housing in the assessment area. In addition, the effects of the COVID-19 pandemic and economic fallout appear to be escalating credit needs targeting affordable housing for low- and moderate-income borrowers and loans for smaller businesses. The median housing value for the area supports the need for more affordable housing. Additionally, there are many opportunities for small farm loans and small business loans, as noted by the community contact and from demographic and economic data. Small business loans, particularly those for working capital, are in high demand. The significant percentages of farms and businesses with GARs of \$1 million or less, and the large number of businesses with four or fewer employees, support this conclusion.

SCOPE OF EVALUATION

General Information

Examiners used the Interagency Small Institution Examination Procedures to evaluate the bank's performance from December 15, 2014, to December 31, 2020. These procedures consist of the CRA Small Institution Lending Test. The Appendix details the performance criteria for this test. This evaluation does not include any lending activity performed by affiliates, as the bank does not have any affiliates that are involved in any lending activities.

For comparison purposes, examiners relied on 2015 ACS data; 2019 D&B demographic data; and similarly situated institutions (SSIs) based on asset size, geographic location, and lending focus. The bank's CRA performance was analyzed in relation to the bank's performance context, which includes (but is not limited to) bank size and structure, financial condition, loan mix, resources, limitations, assessment area demographics, economic factors, competition, loan demand, and available opportunities.

Activities Reviewed

Examiners based the CRA performance conclusions on a review of home mortgage, small business, and small farm loans. Based on Call Report data and the level of originations during the review period, these categories represent the most significant lending activities for the bank. The home mortgage lending performance received the most weight given that it is the predominant lending focus. Small business and small farm lending received equal, but lesser weight than home mortgage lending. No other loan types, such as consumer loans, represent a major product line. Therefore, they provide no material support for conclusions and are not included in the evaluation.

Using bank loan data, examiners reviewed the full universe of home mortgage, small business, and small farm loans originated during calendar year 2019. Although examiners considered lending activity for the entire evaluation period, based on bank records and management's agreement, 2019 activity is considered representative of the entire evaluation period. Therefore, this report only presents 2019 performance. The updated 2015 ACS demographic data provided standards of comparison for the bank's home mortgage lending performance. The 2019 D&B data provided a standard of comparison for the small business and small farm loans. The following table details the full universe of reviewed loans.

Loan Products Reviewed					
Loan Category	Universe / Full Review				
	#	\$(000s)			
Home Mortgag-2019	63	4,804			
Small Business-2019	48	3,390			
Small Farm-2019	25	2,680			

Examiners reviewed the number and dollar volume of home mortgage, small business, and small farm loans. While this report presents both number and dollar volume of loans, examiners emphasized performance by number, as this is generally a better indicator of the individuals and businesses served.

When considering the Lending Test criteria and determining the overall rating, examiners gave more weight to the Borrower Profile criterion. Borrower Profile directly identifies how well the bank serves the traditionally underserved segments of the population, including low- and moderate-income families and smaller businesses and farms. The lack of low- and moderate-income geographies supports Geographic Distribution not contributing to overall conclusion.

Examiners also considered and reviewed the universe of community development investment activities that occurred since the prior CRA evaluation dated December 15, 2014, at the bank's request.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Examiners assigned an "Outstanding" rating for the Lending Test. The conclusion is supported primarily by the performance under the Borrower Profile criterion.

Loan-to-Deposit Ratio

Loan-to-Deposit Ratio Comparison						
Bank	Total Assets as of 09/30/2020 \$(000s)	Average Net LTD Ratio (%)				
Bank of Ontario	54,439	91.4				
Bank of Cashton	118,621	75.4				
Farmers and Merchants	74,699	108.6				
Park Bank	66,167	70.3				
Farmers State Bank	192,695	58.9				
Source: Call Report data 12/31/14 th	rough 09/30/20					

The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's loan-to-deposit ratio, calculated from Call Report data, averaged 91.4 percent over the past 24 calendar quarters since the previous evaluation. The ratio consistently increased during the evaluation period, from a low of 70.5 percent in December 2014 to a high of 110.9 percent in September 2019, with the ratio remaining around 100.0 percent in 2020. Bank of Ontario maintained a ratio above all but one SSI during the evaluation period, as shown in the table. In determining the SSIs, examiners considered institution size, banking structure, loan mix, location (primarily rural areas), as well as management comments.

Assessment Area Concentration

		Number	of Loan	S		Dollars	s Amount	of Loans \$((000s)	m . 1
Loan Category	Inside Outside			tside	Total	Inside		Outside		Total \$(000s)
	#	%	#	%	#	\$	%	\$	%] \$(0003)
Home Mortgage										
2019	50	79.4	13	20.6	63	4,075	84.8	729	15.2	4,804
Small Business										
2019	40	83.3	8	16.7	48	3,058	90.2	332	9.8	3,390
Small Farm		***								
2019	22	88.0	3	12.0	25	2,430	90.7	250	9.3	2,680
Total										
2019	112	82.4	24	17.6	136	9,563	87.9	1,311	12.1	10,874

The bank made a majority of home mortgage, small business, and small farm loans, by number and dollar volume, within its assessment area.

Borrower Profile

The distribution of borrowers reflects excellent penetration among individuals of different income levels and businesses and farms of different sizes. Examiners determined an overall excellent conclusion based on the excellent performance of home mortgage and small business lending, and reasonable performance of small farm lending.

Home Mortgage Loans

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	19.3	15	30.0	914	22.4
Moderate	18.8	13	26.0	1,477	36.2
Middle	24.3	11	22.0	819	20.1
Upper	37.7	11	22.0	865	21.2
Income Not Available	0.0	0	0.0	0	0.0
Total	100.0	50	100.0	4,075	100.0

The overall distribution of home mortgage loans to borrowers of different income levels is excellent, as demonstrated by the comparison between the lending performance of the institution and comparable demographic data for the assessment area. The bank originated the highest percentages to low- and moderate-income borrowers, totaling 30.0 percent and 26.0 percent, respectively.

For low-income borrowers, this performance exceeds demographics by 10.7 percentage points. Additionally, this performance is noteworthy as 9.8 percent of families in the assessment area live below the poverty level. Due to their limited financial resources, families with incomes below the poverty level generally do not have the capacity to support a home mortgage, limiting the demand and opportunity for lending to low-income borrowers. Examiners considered the adjusted demographic to account for those families in poverty, leaving 9.5 percent of low-income families. The bank's performance exceeds the adjusted demographic by 20.5 percent. Bank of Ontario's performance to moderate-income families exceeds the demographic by 7.2 percentage points. With median housing values in the assessment area at \$141,579, low-income borrowers have fewer prospects for affordable homes to purchase. Additionally, bank management stated, and demographic data shows, there are credit needs for affordable housing to low- and moderate-income individuals within the assessment area. Considering the bank's record lending and these performance context factors, performance is excellent.

As previously noted, Bank of Ontario is not a HMDA reporter, and therefore, examiners did not display aggregate data within the table above or compare performance to aggregate data. However,

the aggregate HMDA data is a valuable tool that provides additional context about the demand for home mortgage loans in the assessment area. The 2019 aggregate data shows home mortgage lending to low-income borrowers significantly trailed the demographic at 5.2 percent. The aggregate shows that reporting institutions originated 17.1 percent of home mortgage loans to moderate-income borrowers.

Small Business Loans

Distribution of Small Business Loans by Gross Annual Revenues								
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%			
< \$100,000	48.2	20	50.0	1,315	43.0			
\$100,000 - \$249,999	24.1	14	35.0	628	20.5			
\$250,000 - \$499,999	6.6	4	10.0	273	8.9			
\$500,000 - \$1,000,000	3.1	1	2.5	705	23.1			
Subtotal <= \$1,000,000	82.0	39	97.5	2,921	95.5			
>\$1,000,000	5.1	1	2.5	137	4.5			
Revenue Not Available	12.9	0	0.0	0	0.0			
Total	100.0	40	100.0	3,058	100.00			

Source: 2019 D&B Data, Bank Data Due to rounding, totals may not equal 100.0%

The distribution of small business loans reflects excellent penetration to businesses with gross annual revenues (GARs) of \$1 million or less. The above table shows all but one of the small business loans originated in 2019 were to businesses with GARs of \$1 million or less. The performance compares favorably with the D&B demographic data. Furthermore, a majority of the loans were to business at or below \$100,000 in GAR. The bank's level of lending to these smaller businesses exceeds the demographic comparison. Based on the community contact comments, there are credit needs for lending to smaller business in the assessment area. Examiners also considered Bank of Ontario's small business lending performance compared to the performance of a SSI with a similar banking structure, loan mix, and location. The SSI originated 76.4 percent of small business loans to businesses with GARs of \$1 million or less. This performance was deemed reasonable. Bank of Ontario's performance substantially exceeds the SSI. Considering the D&B demographics, percentages of lending to the lower GAR-segments, community contact's comments, and SSI performance, Bank of Ontario's lending performance to small businesses with GARs of \$1 million and less is excellent.

Small Farm Loans

Gross Revenue Level	% of Farms	#	%	\$(000s)	%
< \$100,000	52.0	8	36.4	552	22.7
\$100,000 - \$249,999	37.2	10	45.4	1,143	47.0
\$250,000 - \$499,999	5.5	4	18.2	735	30.3
\$500,000 - \$1,000,000	2.5	0	0.0	0	0.0
Subtotal <= \$1,000,000	97.2	22	100.0	2,430	0.0
>\$1,000,000	1.5	0	0.0	0	0.0
Revenue Not Available	1.3	0	0.0	0	0.0
Total	100.0	22	100.0	2,430	100.0

The distribution of small farm loans reflects reasonable penetration of loans to farms with GARs of \$1 million or less. The bank originated all 22 loans in 2019 to farms with GARs of \$1 million or less. Furthermore, a majority of those loans were to farms with GARs of \$249,999 or less. This lending performance is in line with the percentage of small farm borrowers noted in D&B demographic data.

Geographic Distribution

Examiners did not evaluate the geographic distribution of loans, as the assessment area does not include low- or moderate-income census tracts or geographies identified as underserved or distressed. As such, an analysis of this criterion would not result in meaningful conclusions.

Response to Complaints

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

QUALIFIED INVESTMENTS AND SERVICES

Management requested examiners consider the bank's community development investments for evaluation purposes. Under the Small Institution Examination Procedures, performance regarding community development activity does not receive a separate rating. However, community development activities can enhance the bank's overall CRA rating. Therefore, examiners reviewed the bank's community development activity since the prior CRA evaluation on December 15, 2014. Bank of Ontario's level of community development activities demonstrates additional responsiveness in meeting the community development needs in the assessment area. The following activity provides supplementary context for an overall outstanding rating.

Qualified Investments

During the evaluation period, the bank made two qualifying investments totaling \$360,000. Both of the investments were municipal obligation bonds purchased within the review period. The qualifying investments represent 7.7 percent of total securities and 5.8 percent of equity capital. This performance is slightly below, but in line with, one nearby institution with an outstanding Small Institution CRA rating where examiners also reviewed investments and services. One of the investments was within the bank's assessment area and in response to the COVID-19 pandemic to finance community development projects focused on small business and small farms and provide services to low- and moderate-income residents. The second investment was outside the assessment area, but within the boarder statewide area. Examiners considered this investment because the bank has been responsive to the credit and community development needs within its assessment area. This investment was for various municipal projects for a city located in a moderate-income census tract.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify evidence of discriminatory or other illegal credit practices inconsistent with helping meet community credit needs; therefore, this consideration did not affect the institution's overall CRA rating.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

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

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

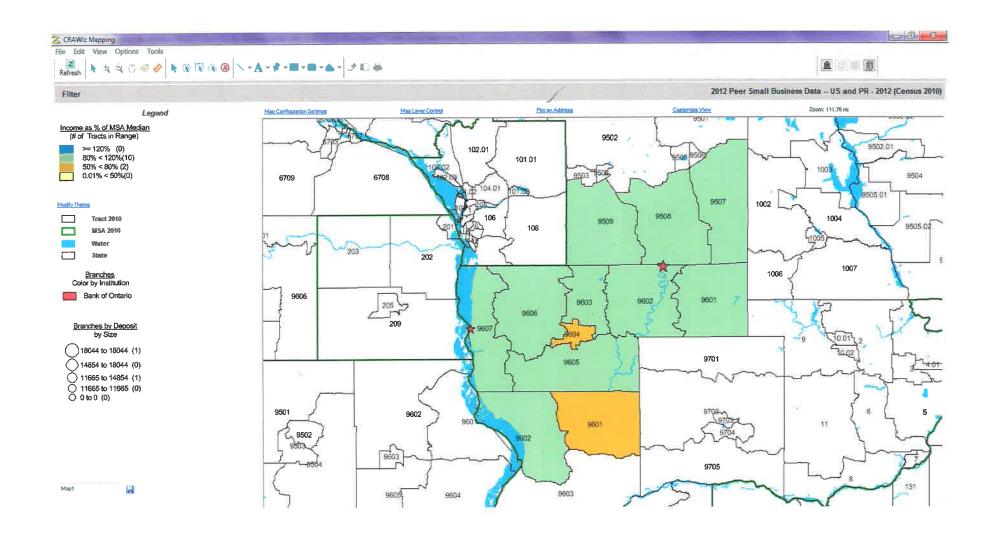
Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial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

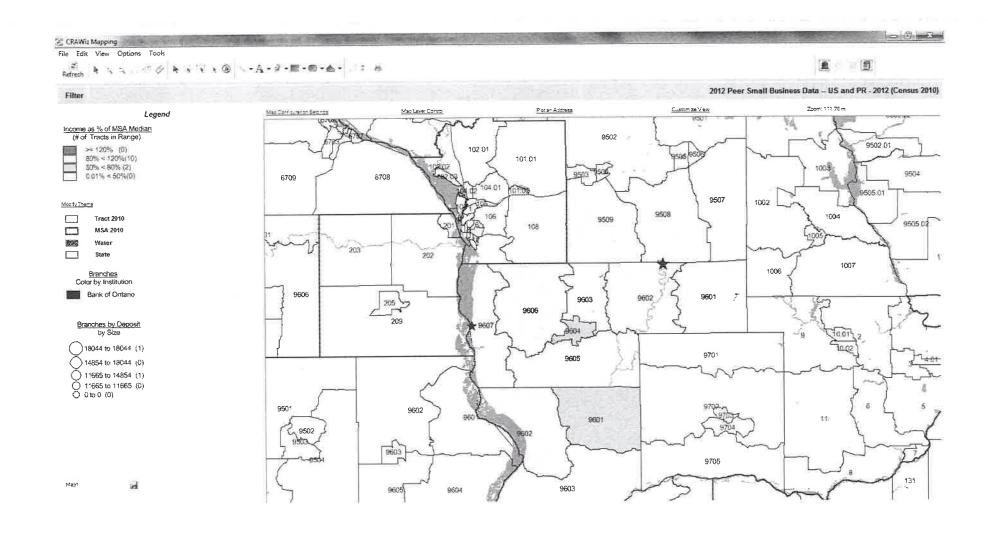
Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements,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

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.





2017 Quarterly Loan-to-Deposit Ratios

1st Quarter - 87.58%

2nd Quarter – 95.24%

3rd Quarter – 91.72%

4th Quarter – 88.32%

2016 Quarterly Loan-to-Deposit Ratios

1st Quarter – 83.48%

2nd Quarter – 87.23%

3rd Quarter – 92.50%

4th Quarter – 87.54%

2015 Quarterly Loan-to-Deposit Ratios

1st Quarter – 73.13%

2nd Quarter – 85.41%

3rd Quarter – 85.69%

4th Quarter – 82.37%

2014 Quarterly Loan-to-Deposit Ratios

1st Quarter – 76.55%

2nd Quarter – 75.85%

3rd Quarter – 72.44%

4th Quarter – 70.51%

2013 Quarterly Loan-to-Deposit Ratios

1st Quarter – 77.15%

2nd Quarter – 76.28%

3rd Quarter – 79.38%

4th Quarter – 77.28%

2012 Quarterly Loan-to-Deposit Ratios

1st Quarter – 90.52%

2nd Quarter – 87.59%

3rd Quarter – 88.12%

4th Quarter – 81.38%

2011 Quarterly Loan-to-Deposit Ratios

1st Quarter – 85.34%

2nd Quarter – 90.33%

3rd Quarter – 91.93%

4th Quarter – 92.24%

2010 Quarterly Loan-to-Deposit Ratios

1st Quarter – 100.00%

2nd Quarter – 97.89%

3rd Quarter – 96.98%

4th Quarter – 92.40%

2009 Quarterly Loan-to-Deposit Ratios

1st Quarter – 103%

2nd Quarter – 103%

3rd Quarter – 103%

4th Quarter – 97%