

Loan to Deposit Ratios 2024, Reported Quarterly			
Date	Total Loans	Total Deposits	Loan to Deposit Ratio
3/31/2024	42,592,000	82,052,000	52%
6/30/2024	44,584,000	83,225,000	54%
9/30/2024	45,387,000	85,745,000	53%
12/31/2024	47,709,000	86,128,000	55%

Loan to Deposit Ratio

Hours of Operation

	Main Lobby	Drive Through
Monday through Thursday	9AM to 5PM	9AM to 5PM
Friday	9AM to 5PM	9AM to 5PM
Saturday	Closed (***)	9AM to 11:30AM

*** Safety Deposit box, deposit account openings, and loan department services are available by appointment.

The bank is located on the corner of Main and Wilson Streets and the street address is 103 South Main Street, Amherst, WI 54406. We define our community to be located in census block number 9601, 9606 and 9613. The physical location of the bank is in census block number 9606.



March 28, 2025

Written comments

We have not received any written comments so for 2025 and have not received any written comments for the previous years; 2018, 2019, 2020, 2021, 2022, 2023, and 2024.

Branch openings and/or closings

We have not planned to open or close any branches offices in 2025 and did not open or closing any branches in 2018, 2019, 2020, 2021, 2022, 2023, and 2024.

Complaints

We have not received any written or verbal complaints regarding community reinvestment.

Grant W. Krogwold, Loan Officer

Grant W. Krogwold, L.O.
3/28/25

~~Written comments Branch openings/closings~~



Loan Services

Whatever your personal loan needs, we're here for you. Call to apply or make an appointment today.

Credit Card

We've partnered with ICBA (Independent Community Bankers of America) and TCM Bank to offer you the best credit card options.

Personal Loans can help in an emergency.

Auto, Truck, Boat, ATV, and Snowmobile Loans are quick and easy.

Home Equity Loans for almost any purpose using the value of your home to secure the loan. We have regular amortized equity loans and lines of credit. Flexibility for your needs.

Real Estate Loans often begin with the purchase or construction of your first home, or the purchase of land for future building. This is a very exciting event for you, let us make financing easy. We also offer refinancing of existing mortgage loans. We have several options for you.

Business and Agriculture Loans

We've helped our business community thrive for many years. Whether you're an experienced business person or are thinking of starting a new venture, we're here to help you reach your goals. Since our decisions are made locally, we can work with you to quickly find the best loan option for your situation.

Student Loans

We've partnered with Bankers' Bank and Sallie Mae to offer you the best student loan options

Deposit Accounts offered at The International Bank of Amherst

At The International Bank of Amherst we have several checking accounts and a savings account that we feel will fit the needs of each individual customer based on their spending habits and ways of saving.

Checking Accounts

Regular Checking

Our regular checking is a good account to use if you don't like to keep your investment dollars in checking account.

Opening deposit of \$100 or more

Avoid the \$6.00 per statement cycle service fee by keeping minimum daily balance of \$100

Unlimited transactions

Free online banking and eStatements

Combined statement (add your savings & certificate of deposits to the monthly statement)

Debit card \$2 monthly fee per account.

Basic Checking

Our basic checking account is a great account if you don't plan to write a lot of checks

Opening deposit of \$100 or more

No minimum balance required after the initial deposit of \$100.00 or more.

To avoid a monthly service charge fee you are limited to 10 written checks per statement cycle. With the 11th check your account will be assessed a \$0.25 per check fee

Unlimited deposits and electronic debits (ACH- Debit Cards)

Free online banking and eStatements

Combined statement (add your savings & certificate of deposits to the monthly statement)

Debit card \$2 monthly fee per account.

Interest Checking

Our interest checking is great way to get interest paid on your balance.

Opening deposit of \$1,000.00 or more.

Earn interest on the entire account balance.

Avoid a \$10.00 service charge fee per statement cycle by keeping a minimum balance of \$1,000.00

Free online banking and eStatements

Combined statement (add your savings & certificate of deposits to the monthly statement)

Free Debit Card

Business checking

We have cost effective options for our business customers

Money Market

Our money market account lets you combine the benefits of earning more interest while being able to issue checks.

Opening deposit of \$1,000.00 or more.

Earn interest on the entire account balance.

Avoid a \$10.00 service charge fee per statement cycle by keeping a minimum balance of \$1,000.00

A great investment that pays you interest plus gives you immediate access

Funds accessible by check, teller withdrawal, or automatic transfer.

Free online banking and eStatements

Combined statement (add your savings & certificate of deposits to the monthly statement)

Fees: Excessive withdrawals or transfers of more than 6 per statement cycle on the money market checking will result in a \$5 fee for the 7th

Savings

Whatever your age or stage in your financial life, we have a savings account to help you achieve your goals

Statement Savings

Opening deposit of \$100.00 or more.

Earn interest on entire account balance

To avoid a monthly fee of \$5.00; keep a daily minimum balance of \$100

Fees: Excessive withdrawals or transfers of more than 6 per statement cycle on the money market checking will result in a \$5 fee for the 7th

Free online banking and eStatements

Children/Senior Savings

Customers under the age of 19 or over 61 years of age

Earn interest on entire account balance

Opening deposit of \$25.00 or more.

To avoid a monthly fee of \$2.50; keep a daily minimum balance of \$25

Fees: Excessive withdrawals or transfers of more than 6 per statement cycle on the money market checking will result in a \$5 fee for the 7th

Free online banking and eStatements

Holiday Club

The perfect way to save for the holidays or other year end expenses.

Initial deposit of \$25.00 or more.

Earn interest on entire account balance

Interest added to balance around the 15th of October and funds distributed

Account stays open to begin saving for the next year

Free Online Banking

Health Savings

Health savings accounts (HSAs) are subject to limitations and/or penalties imposed by the Internal Revenue Service. Please refer to the HSA

Agreement or your tax advisor for additional information,



1. Name of the person 2. Address 3. City	4. State 5. Zip	6. Telephone Number 7. Date of Birth 8. Sex	9. Occupation 10. Education 11. Marital Status 12. Other
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Earn interest on entire account balance
Free Debit Card
Free Online Banking

Certificate of Deposit

We have terms between 3 months and 6 years.
Subject to an early withdraw penalty

Individual Retirement Accounts (IRA)

We offer Traditional and Roth IRAs. We can't advise you regarding the tax benefits, we can help you decide which Certificate of Deposit is your best choice.

Internet Bank allows our customers to view the following information online.

Balance inquires on checking, savings, CDs, loan accounts, and more.

Inquiries by check number or amount.

Transactions search by multiple criteria.

Account statements:

Previous statement

Current statement

Previous business day

Current business day

Account data can be exported to popular financial applications

Maturity dates

View front and back of check images and deposit slips

Online statements available in Adobe Acrobat format (PDF)

Interest information, current and previous year

Activity information

Transfer funds between accounts

Scheduled transfers

Change login user ID and password

Change e-mail address

Online help

All accounts can be enabled or disabled for internet banking access on a customer or account level.

PUBLIC DISCLOSURE

October 23, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

*Placed
IN
Public File
on
11/16/2023
MJB*

The International Bank of Amherst
Certificate Number: 14907

103 South Main Street
Amherst, Wisconsin 54406

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.

Performance Evaluation

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory 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 International Bank of Amherst's (IBOA) performance under the Lending Test, summarized below, supports the satisfactory rating.

- The loan-to-deposit ratio (LTD) is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area (AA) credit needs.
- A majority of loans and other lending related activities are in the institution's AA.
- The AA does not include any low- or moderate-income geographies; therefore, examiners did not evaluate the geographic distribution criterion.
- The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels and businesses of different sizes.
- The bank did not received any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

IBOA has one office in Amherst, Wisconsin in Portage County. IBOA does not have any affiliates or a parent company. IBOA offers traditional retail and commercial loans and deposit services. Alternative delivery systems allow for access outside the bank's normal lobby and drive-up facility hours, and include online and mobile banking. Bank customers are able to gain account access, surcharge free, through Acce\$\$ ATM terminals statewide.

IBOA received a Satisfactory rating from the FDIC at its last CRA evaluation, conducted as of August 14, 2017. FDIC examiners used Small Institution Examination Procedures at the previous and current evaluations. The first appendix contains information about the performance criteria. Since the last CRA evaluation, the bank did not engage in any branching or merger activities. It continues to offer similar products and services. According to the June 30, 2023 Call Report data, the bank reported total assets of \$95.6 million, total loans of \$38.7 million, and total deposits of \$83.2 million.

The bank's strategy remains relatively unchanged from the last evaluation, and the credit focus continues to be residential mortgage and commercial lending. Among all of its loan products, the highest lending volume continues to be in residential mortgages and business loans, by number and

dollar volume. According to the bank's June 30, 2023 Call Report, residential and commercial lending represents 64.8 percent of the bank's total portfolio.

Loan Portfolio Distribution as of 6/30/2023		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	1,724	4.5
Secured by Farmland	5,492	14.2
Secured by 1-4 Family Residential Properties	11,482	29.6
Secured by Multifamily (5 or more) Residential Properties	1,246	3.2
Secured by Nonfarm Nonresidential Properties	7,484	19.3
Total Real Estate Loans	27,428	70.8
Commercial and Industrial Loans	4,901	12.7
Agricultural Production and Other Loans to Farmers	1,536	4.0
Consumer Loans	781	2.0
Obligations of State and Political Subdivisions in the U.S.	4,084	10.5
Other Loans	7	<0.1
Lease Financing Receivable (net of unearned income)	-	-
Less: Unearned Income	-	-
Total Loans	38,737	100.0
<i>Source: Reports of Condition and Income</i>		

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

DESCRIPTION OF ASSESSMENT AREA

IBOA has not changed its AA since the previous evaluation. The bank continues to delineate the three eastern-most census tracts in Portage County, WI as its AA. Two are middle-income, and one is an upper-income census tract. The bank's single office is in a middle-income tract. The AA does not arbitrarily exclude any low- or moderate-income census tracts, does not reflect illegal discrimination, and otherwise meets the requirements of the CRA. The following sections provide additional demographic and economic data for the AA.

Economic and Demographic Data

According to US Census data, the AA population grew by 1.5 percent between 2010 and 2020. AA families with incomes below the poverty level increased to 3.3 percent of total families as of 2020. The following table presents key demographic information for the AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	15,000	0.0	0.0	69.2	30.8	0.0
Housing Units by Geography	6,942	0.0	0.0	68.8	31.2	0.0
Owner-Occupied Units by Geography	5,267	0.0	0.0	68.5	31.5	0.0
Occupied Rental Units by Geography	744	0.0	0.0	79.0	21.0	0.0
Vacant Units by Geography	931	0.0	0.0	62.1	37.9	0.0
Businesses by Geography	1,099	0.0	0.0	67.1	32.9	0.0
Farms by Geography	208	0.0	0.0	70.2	29.8	0.0
Family Distribution by Income Level	4,354	11.7	17.8	22.9	47.6	0.0
Household Distribution by Income Level	6,011	15.0	15.7	19.4	49.9	0.0
Median Family Income Non-MSAs – WI (2020)		\$71,740	Median Housing Value			\$202,251
			Median Gross Rent			\$712
			Families Below Poverty Level			3.3%

Source: 2020 U.S. Census and 2022 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 D&B data, since the bank’s last CRA evaluation, 269 new businesses formed in the AA. D&B data serves as the benchmark for measuring the bank’s lending to small businesses. Of the 1,099 businesses in the AA, 89.7 percent had gross annual revenues (GARs) of \$1 million or less; slightly over 4.0 percent had GARs in excess of \$1 million; and 6.3 percent did not report revenues. Based on 2022 D&B data, a substantial majority of AA businesses (94.0 percent) operate from a single location and employ less than five people (70.1 percent). The three largest concentrations of AA businesses are: services (26.1 percent); agriculture, forestry, and fishing (15.9 percent); and retail trade (10.4 percent).

Examiners use the FFIEC-adjusted median family income figures to assess the bank’s record of home mortgage lending to borrowers of different income levels. The following table shows the income level categories for loans granted in 2022 in the bank’s AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2022(\$81,500)	<\$40,750	\$40,750 to <\$65,200	\$65,200 to <\$97,800	≥\$97,800

Source: FFIEC

Examiners consider a variety of economic and demographic data to assess the bank’s lending activities and the availability of lending opportunities in the AA. This data includes unemployment rates, which can affect demand for both home mortgage and small business lending. As shown in the following table, Portage County’s unemployment rates were generally at or below both state and national averages throughout the evaluation period.

Unemployment Rates				
Area	2020	2021	2022	Oct 2023
	%	%	%	%
Portage County	5.5	3.6	2.9	2.4
Wisconsin	6.4	3.8	2.9	2.6
National Average	8.1	5.3	3.6	3.4

Source: Bureau of Labor Statistics

Competition

There is a moderate level of competition for deposits among insured financial institutions in Portage County. According to the FDIC’s June 30, 2023 Summary of Deposit Report, 14 financial institutions operate 24 offices in Portage County. IBOA ranks 8th with 4.0 percent of the market share.

There is also a moderate level of competition for home mortgage loans in the AA among banks, credit unions, and non-depository mortgage lenders. IBOA is not required to collect or report data under the Home Mortgage Disclosure Act (HMDA), and it has elected not to do so. Therefore, the analysis of home mortgages does not include comparisons to aggregate HMDA data. The aggregate data, however, helps illustrate demand. Aggregate data for 2022 shows that 68 lenders reported 377 mortgage originations in the AA. Additionally, 58 of the 68 lenders with AA mortgage originations reported less than ten originations. The top five lenders included two credit unions and three nationally chartered banks. These five lenders accounted for 48.0 percent of reported originations in the AA. Many institutions are not required to report lending data; therefore, competition for these loans is even greater than the aggregate data reflects.

Community Contact

As part of the evaluation process, examiners contact representatives in the community to help determine AA credit needs, obstacles and opportunities. Examiners interviewed the chief executive officer of a business development organization that operates in Portage County. According to the contact, the most pressing credit needs in the county are for workforce housing and business expansion. Additionally, the contact noted that a material number of area employers draw on labor outside of Portage County.

Credit Needs

Based on D&B data and discussions with community contacts, the primary credit needs in IBOA’s AA are affordable housing and business expansion financing.

SCOPE OF EVALUATION

General Information

This evaluation considers the bank's performance under the Interagency Small Institution Examination Procedures since the last evaluation, conducted as of August 14, 2017, through the current evaluation as of October 23, 2023.

Activities Reviewed

Examiners reviewed all of the bank's home mortgage and small business loans originated or renewed during 2022, and held in the portfolio. This includes 37 home mortgages totaling \$4.8 million and 51 small business loans totaling \$6.1 million. These loans are representative of the bank's lending performance during the entire evaluation period. Home mortgages and small business loans received equal weighting in the overall conclusions. Although small farm lending is an important part of the bank's portfolio, the bank's lending volume for this product did not warrant classification as a primary product. Examiners used 2020 US Census data and 2022 D&B data to assess the bank's home mortgage and small business lending activities, respectively.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, the bank's performance under the Lending Test is satisfactory, based primarily on the bank's record of lending to borrowers of different income levels and businesses of different sizes. The following sections summarize examiners' conclusions under each of the Lending Test criteria.

Loan-to-Deposit Ratio

The LTD ratio is reasonable considering seasonal variations and taking into account lending-related activities given the institution's size, financial condition, and AA credit needs.

The bank's average net LTD ratio, calculated from Call Report data, was 46.1 percent over the 25 calendar quarters from September 30, 2017 to September 30, 2023. The ratio consistently declined from 64.1 percent in September 2017, until reaching a low of 42.9 percent in December 2021. This decrease is largely attributable to an influx of deposits from stimulus payments related to the COVID-19 pandemic and increased deposits from municipal governments.

Although lending increased due to the bank's participation in the Small Business Administration Paycheck Protection Program, these loans were transitory and did not offset increases in deposits. Additionally, the bank's portfolio currently includes approximately \$7.7 million in unused lines of credit, which are not reflected in the LTD ratio. USDA-offered programs available through cooperative electric utilities also took business and agricultural marketshare. Lastly, the bank faced increased competition for mortgage loans throughout the evaluation period.

Notwithstanding these competitive pressures, the ratio has improved during the last seven quarters, increasing to 48.7 percent as of September 30, 2023.

Although IBOA's LTD ratio is below the range of comparable institutions, the volume of originated loans demonstrates that the bank continues to make loans in an increasingly competitive market. Examiners selected comparable institutions based on their asset size, geographic location, and lending focus.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 9/30/2023 (\$000s)	Average Net LTD Ratio (%)
International Bank of Amherst	95,575	46.1
Pineries Bank	133,498	63.6
Portage County Bank	200,304	72.3
Bonduel State Bank	99,550	64.2
Community First Bank	103,023	65.3
Farmers State Bank of Waupaca	246,435	67.5
First State Bank	545,681	73.5
Premier Community Bank	486,131	78.0

Source: Reports of Condition and Income 9/30/2017 - 9/30/2023

Assessment Area Concentration

IBOA made a majority of its home mortgage and small business loans, by number and dollar volume, within its AA, as shown in the following table.

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	29	78.4	8	21.6	37	3,434	72.4	1,312	27.6	4,746
Small Business	42	82.4	9	17.6	51	4,832	78.8	1,300	21.2	6,132
Total	71	80.7	17	19.3	88	8,266	76.0	2,612	24.0	10,878

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

Geographic Distribution

As noted earlier, the AA does not include any low- or moderate-income census tracts. Therefore, examiners did not evaluate the bank's performance under the geographic distribution criterion.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among individuals of different income levels and businesses of different sizes. The excellent

performance of home mortgage and reasonable performance for small business loans support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is excellent. The following table shows that the bank’s lending to low-income borrowers significantly exceeds the percentage of families, based on the percentage by number of loans. This is particularly noteworthy given that this category includes the 3.3 percent of AA families with incomes below the poverty level. These families likely face significant difficulties in qualifying for and/or servicing debt in amounts necessary to afford homes in the AA. The bank’s record of lending to moderate-income borrowers essentially matches the percentage of families.

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	11.7	6	20.7	392	11.4
Moderate	17.8	5	17.2	404	11.8
Middle	22.9	4	13.8	319	9.3
Upper	47.6	10	34.5	1,856	54.0
Not Available	0.0	4	13.8	463	13.5
Totals:	100.0	29	100.0	3,434	100.0

*Source: 2020 U.S. Census; Bank Data; "-" data not available
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank’s record of lending to businesses with GARs of \$1 million or less is slightly below the percentage of businesses. However, this is reasonable, because this category includes smaller business that may not yet qualify for traditional commercial loans and may opt for alternative credit facilities such as credit cards or home equity lines of credit.

Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	88.4	32	76.2	3,336	69.0
>\$1,000,000	4.2	10	23.8	1,496	31.0
Revenue Not Available	7.5	0	0.0	0	0.0
Totals:	100.0	42	100.0	4,832	100.0

*Source: 2022 D&B Data; Bank Data; "-" data not available
Due to rounding, totals may not equal 100.0%*

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices

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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.

APPENDIX "A" CRA STATEMENT

The Board of Directors of the International Bank of Amherst believes that sound loans are a desirable and profitable means of employing funds available for investment.

The International Bank of Amherst has been a corporate citizen of the Amherst area since 1893. As the Amherst area has grown the bank continuously attempted to serve its customers and meet the needs of its local community. As a result, the bank's local community consists of the Tomorrow River School District, which includes the villages of Amherst, Amherst Junction and Nelsonville. A map detailing the bank's local community accompanies this statement. The bank is expected to make and seek to develop all sound, productive and socially beneficial loans that the resources of the bank permit, and that opportunity affords, to responsible entities and individuals in the community or trade area it serves.

The bank shall not discriminate against credit applications on the basis of race, color, religion, national origin, sex, marital status, familial status, physical condition, developmental disability, or age (provided the applicant has the capacity to contract); or because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act.

The International Bank of Amherst believes in informing the community of its interest in, and commitment to the intent of community reinvestment is integral to success in extending credit. Making the community aware of the types of credit the bank will extend and its special efforts to meet community needs is an ongoing process. It is a bank wide responsibility.

The bank will help meet the credit needs of its local community, including low and moderate-income neighborhoods, consistent with the safe and sound operation of the bank, and is prepared to extend the following types of credit to members of the local community:

Home purchase mortgage loans include;

- one or two-family, owner-occupied, residential mortgage loans
- loan products include short-term fixed rate, and long-term fixed rate mortgages, including WHEDA for first time homebuyers, and secondary market access.
- Interim financing for the construction of primary residences.

Consumer loans include:

- home improvement loans
- student loans
- second mortgage loans
- credit card accounts
- automobile loans

Commercial, small business and agriculture loans include:

- fixed-asset term loans for building and equipment
- lines of credit for working capital
- government-assisted financing programs offered by the RECD, SBA and WHEDA

The bank believes the examples of credit outlined above represent its commitment to meet the needs of its local community. The examples provided are not intended to constitute the complete list of products and services, which can be offered to residents of the community. Additionally, the local community's market and economic conditions may from time to time, restrict the availability of certain types of credit.

The bank's preparedness to extend credit is subject to legal restrictions, prudent lending practices, availability of funds and safe and sound operation of the Bank. General credit and economic conditions may exist from time to time which make it temporarily impossible for the bank to offer the above listed credits.

Identifying credit needs within its local community, particularly those of low and moderate-income residents, is the basis for a financial institution's success in implementing its community reinvestment program. The International Bank of Amherst believes a continual dialogue with community leaders and special segments of the population are critical to obtaining the information necessary for needs assessment. Further, the bank believes that monitoring developments in the community by reviewing the public sector policies and practices provides valuable information. In the process of identifying credit needs, the uses a number of methods to communicate with low and moderate-income communities and the public sector.

Units of local government throughout the bank's community are involved in numerous efforts to promote housing and economic development, particularly in low and moderate-income neighborhoods. The bank regularly obtains information from the Village of Amherst, the Amherst Business Association, Cap Service Inc., and Wisconsin Housing and Economic Development Authority, concerning housing and economic development trends. The bank also works with public administrators at the county level and in other municipalities located in the service area.

The bank has an officer call program, which solicits information from existing and prospective customers regarding the types of credit required in the community. The officers call on area Realtors, area business leaders, The Tomorrow River School Board and The Village of Amherst. Such targeted calling allows the bank to identify the particular needs of special populations.

The Board of Directors and the officers of the bank belong to various community groups such as Lions, Amherst Business Association, Amherst Fire Department, Amherst Fair Board, Village of Nelsonville, and Economic Development Commission. Through contact with these groups and activities, we are able to ascertain the needs of the community.

A number of methods are used by the bank to inform its local community of its services and types of credit it is willing to make available. These methods include advertising on local radio, print ads in local newspaper, presentations about products and services at community meetings, sponsorship of community events and programs, memberships in various organizations serving the community, and an officer call program.

Consistent with the intent of community reinvestment, the bank has undertaken a number of efforts to inform low and moderate income populations. Examples of these efforts include:

- Print ads are placed on a regular basis in the Tomorrow River Times.
- Conduct one on one interviews detailing mortgage loan products for clients.
- Conducted workshops in Financial Management for small business clients
- Recognized as an active member of the Amherst Business Association
- Brochures and direct mailing

These efforts are representative of the bank's commitment to take advantage of opportunities and forums to communicate its products and services, particularly those benefiting low and moderate income populations.

The International Bank of Amherst believes its community reinvestment policies and their implementation to be a responsibility of all its employees. The Board of Directors reviews and affirms the bank's Community Reinvestment Statement annually.

Management at all levels of The International Bank of Amherst is made familiar with the bank's reinvestment activities. Particular emphasis is placed in the mortgage lending, small business lending, agricultural lending, and retail banking operations. This emphasis reflects the intent of community reinvestment, i.e., extending credit to low and moderate income persons and financing housing and economic development activities.

Credit extensions and denials are analyzed on a regular basis to monitor the geographic distributions of credit throughout the bank's local community.

It is the responsibility of management to generate and recommend to the Board of Directors a statement of procedures and any changes therein which may from time to time be deemed necessary, and upon such recommendation, the Board will revise such statement, and/or changes therein, and adopt such statement of changes as it deems appropriate for the guidance of management and personal of the bank.

This policy shall be available for public inspection and review upon request, as required by law and applicable regulations, and shall be made available upon request during regular banking hours.

This is a statement of lending policy by the Board of Directors of The International Bank of Amherst, effective until revised or withdrawn, whereupon a new policy statement shall become effective. In the event of a new policy statement has not been adopted to such date, this policy may continue to be in effect.

This revised statement of Policy is hereby adopted by the Board of Directors on September 14, 2012.

Demographic Data

Assessment Area Name: Amherst AA Activity Year: 2014

Filter : All

Race/Ethnic Origin	Count	%	Hispanic	%	Other Population Info	Count	%
Amer. Indian/Alaskan Native	46	0.31%	10	1.96%	Persons In Group Otrs	0	0.00%
Asian/Pacific Isld	38	0.26%	1	0.20%	Unemployed Labor	492	4.23%
Black	23	0.16%	0	0.00%		3,248	27.93%
White	14,052	95.11%	303	59.53%	Civilians not in work force	11,628	78.70%
Other Race	107	0.72%	195	38.31%	Persons 16 & older	1,837	12.43%
Hispanic	509	3.45%			Persons Over 65	4,391	77.08%
Total Persons	14,775	100.00%			Total Families	5,697	
Minority	723	4.89%			Total Households		

Housing Type	Count	%	Other Housing Information	Count	% of Total Housing
Owner Occupied Units	5,007	78.43%			
Rental Occupied Units	690	10.81%	Number of Housing Units Where		
Total Rental Units	732	11.47%	Monthly Owner Costs > 30% of Income	1,238	19.39%
Total Condo Units	NA	NA			
1-4 Family Units	5,700	89.29%			
Multifamily Units	112	1.75%			
Mobile Homes or Trailers	569	8.91%	Monthly Renter Costs > 30% of Income	131	2.05%
Other Units	3	0.05%			
Boarded Up Units	NA	NA	Weighted Avg Monthly Gross Rent		\$586
Occupied Housing Units	5,697	89.24%	Weighted Avg of Median Year Built		1976
Vacant Housing Units	687	10.76%	Weighted Avg of Median Housing		\$154,253
Total Housing Units	6,384	100.00%			

Tract Characteristics	Count	%	Households	%	Total Rental	%
Low	0	0.00%	0	0.00%	0	0.00%
Mod	0	0.00%	0	0.00%	0	0.00%
Middle	1	33.33%	1,986	34.86%	323	44.13%
Upper	2	66.67%	3,711	65.14%	409	55.87%
NA	0	0.00%	0	0.00%	0	0.00%

Number Of Households	Count	%	Income Data	Amount
Wage/Salary	4,495	78.90%	Weighted Average of Median Family Income	\$66,847
Self Employed (Non Farm)	NA	NA	Weighted Average of Median Household Income	\$59,501
Self Employed (Farm)	NA	NA	Weighted Average of Census MSA Median Family Income	\$57,005
Social Security	1,650	28.96%	Weighted Average of HUD Updated MSA Median Family Income	\$60,600
Public Assistance	61	1.07%		
Retirement	1,001	17.57%		
Below Poverty Level	402	7.06%		
Non English Speaking	141	2.47%		

Data Source: 2010 US Census

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Census Tracts 9601, 9606, 9613 in Portage County



Community Reinvestment Act Notice

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 the quarter. This list is available from the Regional Director, Division of Compliance and Consumer Affairs, FDIC 500 West Monroe Street, Suite 3600, Chicago, IL 60661.

You may send written comments about our performance in helping to meet community credit needs to H. B. Pomeroy President, The International Bank of Amherst, PO Box 39, Amherst, WI 54406 and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at www.fdic.gov/regulations/cra. 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 Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC.

OUR COMMUNITY IS DEFINED ON THE MAP BELOW AND CONTAINS CENSUS BLOCK NUMBERS 9601,9606 & 9613.



