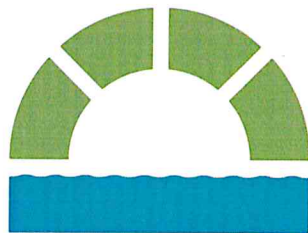


Community Reinvestment Act (CRA)

Public File



CROSSBRIDGE
COMMUNITY BANK

Purpose First

COMMUNITY REINVESTMENT POLICY/STATEMENT PURPOSE

Crossbridge Community Bank (referred to collectively as "bank", or "Crossbridge" for the duration of this policy) recognizes that the Community Reinvestment Act (CRA) is part of the fair lending legislation aimed at prohibiting redlining and discrimination in the lending process. The primary purpose of the Act is to encourage banks to reinvest in their local communities through affirmative credit programs and community involvement. The regulatory agencies have been granted administrative enforcement powers which can be invoked for poor CRA performance. These enforcement powers include the denial of bank applications for branches, branch relocations, bank holding company formation, acquisitions, consolidations, and mergers.

Our bank is committed to compliance with both the spirit and the intent of the law found in the Community Reinvestment Act by establishing internal procedures that will encourage fair lending, affirmative credit programs, community involvement, and compliance with the technical requirements of the Act.

This statement has been prepared for our depositors, loan customers and members of the community, pursuant to the Act. There are four parts to this statement, and each serves a separate purpose.

PART 1 is entitled 'Delineation of Lending Community/Assessment Area.'

Our bank has defined the area within which we are helping to meet the credit needs of the community. Our lending community/assessment area includes the geographies in which the bank has its main office, branch office, as well as the surrounding geographies in which the bank has originated or purchased a substantial portion of its loans.

PART II consists of a list of the general types of credit which we offer and an explanation of how the availability of certain types of credit can vary. Due to limitations of space, this listing cannot contain all of the terms and conditions which affect our ability to grant credit. A loan officer will be pleased to provide you with detailed information upon request.

PART III is an important notice about the operation of the Community Reinvestment Act.

PART IV contains a brief description of some of the activities we have been engaged in to ascertain and meet the credit needs of our lending community.

PART V contains additional steps taken to meet CRA responsibilities.

CRA Public File

The Bank will maintain its central CRA Public File in the main office. This Public File will include the following information:

- All written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's CRA performance.
- A copy of the public section of our bank's most recent CRA Performance Evaluation prepared by our supervisory agency.
- A list of the bank's branches. A list of branches opened or closed during the current year and each of the two calendar years.
- A list of services generally offered at the bank's branches and any differences in the availability or cost of services at particular branches.

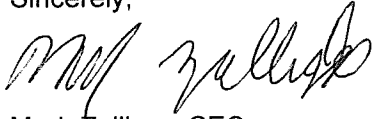
- A description of the assessment area and the bank's loan-to-deposit ratio for each quarter of the prior calendar year

CRA Public Notice

Our Bank will inform the public about the Community Reinvestment Act by posting the appropriate CRA notice in the lobby of each of our office locations.

We hope that the information contained in this statement is useful to you. If you have any questions, do not hesitate to contact us or to speak with another officer.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Zulliger', written in a cursive style.

Mark Zulliger, CEO

Our customer base is served out of two main locations:

- 1) **CROSSBRIDGE Community Bank, 15 E Wisc Ave., Tomahawk WI**
Main Lobby, Drive Up, and onsite ATM
Hours of Operation: Main Lobby Mon – Fri 8:30am – 4:30pm
Drive Up: Mon – Fri 7:30am – 5:30pm
Saturday 7:30am – 12noon
(Saturday hours with a Universal Banker or Lending Officer by appointment).
- 2) **Merrill location, 907 East Main Street, Merrill, WI 54452 a full service branch**
including a Main Lobby, Drive Up and onsite ATM.
Hours of Operation: Main Lobby Mon – Fri 8:30am– 4:30pm
Drive Up Mon – Fri 7:30am – 5:30pm;
Saturday 7:30am – 12noon
(Saturday hours with a Universal Banker or Lending Officer by appointment).

We have a “teaching” location (Hatchet Bank) located in the cafeteria/commons area of the Tomahawk High School, This branch is run “by Students for Students”. We employ students in the Youth Apprenticeship program for both the Main locations and the teaching location, Hatchet Bank. This location is only open during the School Year.

We provide an ATM in the Commons area of the Tomahawk Elementary/Middle/High School area. All fees generated from the ATM are donated to the FBLA (Future Business Leaders of America) club at the High School.

Part I: Delineation of Lending Community/Assessment Area

Due to our in depth familiarity with the markets in the entire Wisconsin Northwoods, and having recognized a need for financing options in an expanded area, our lending area is considered ‘Northwoods Wisconsin’ consisting of the counties of Lincoln, Oneida, Marathon, Forest, Langlade, Vilas, Iron, Price and Taylor.

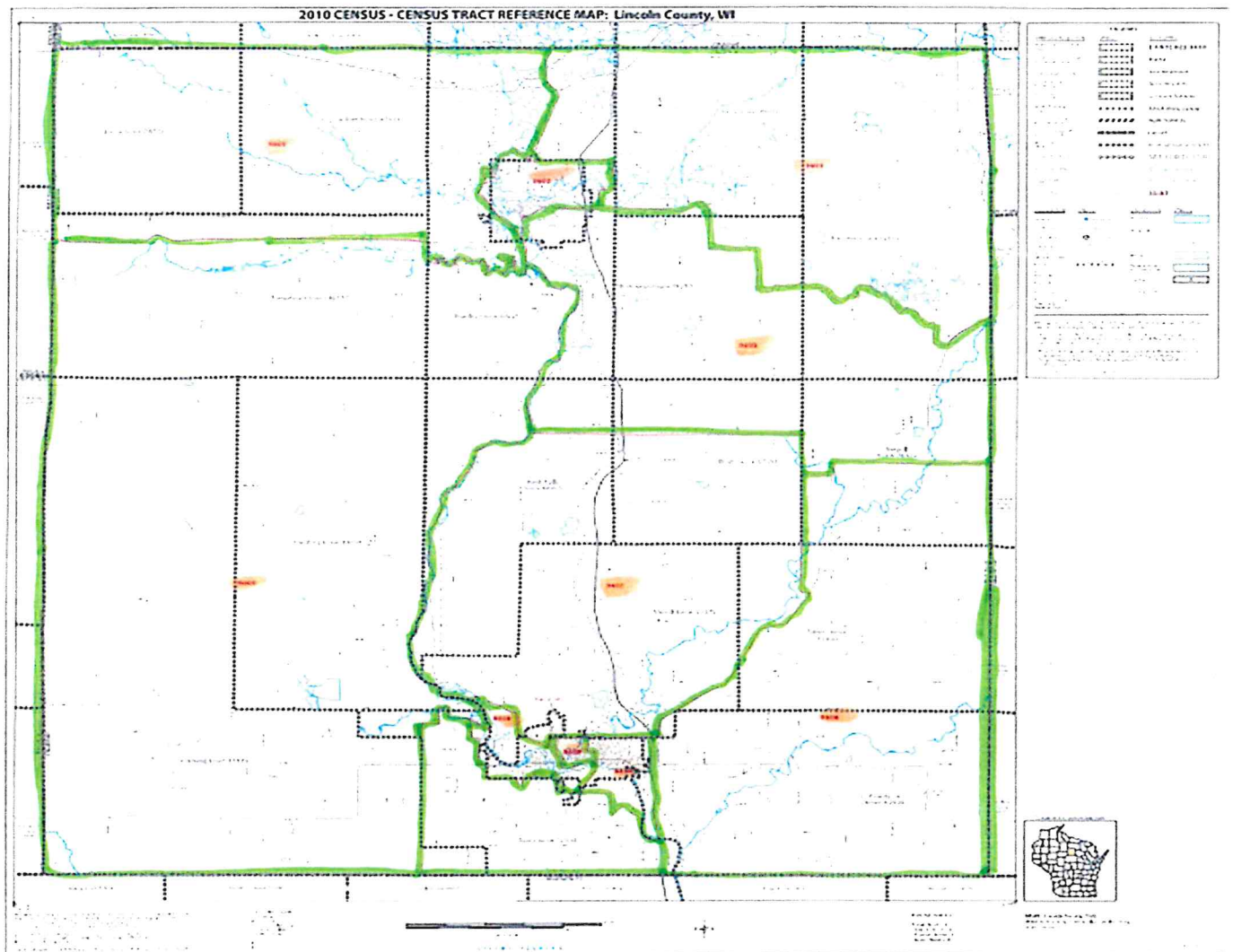
By nature of our physical locations, our primary Lending Community/Assessment Area consists of the following Census Tracts in Lincoln and Oneida Counties.

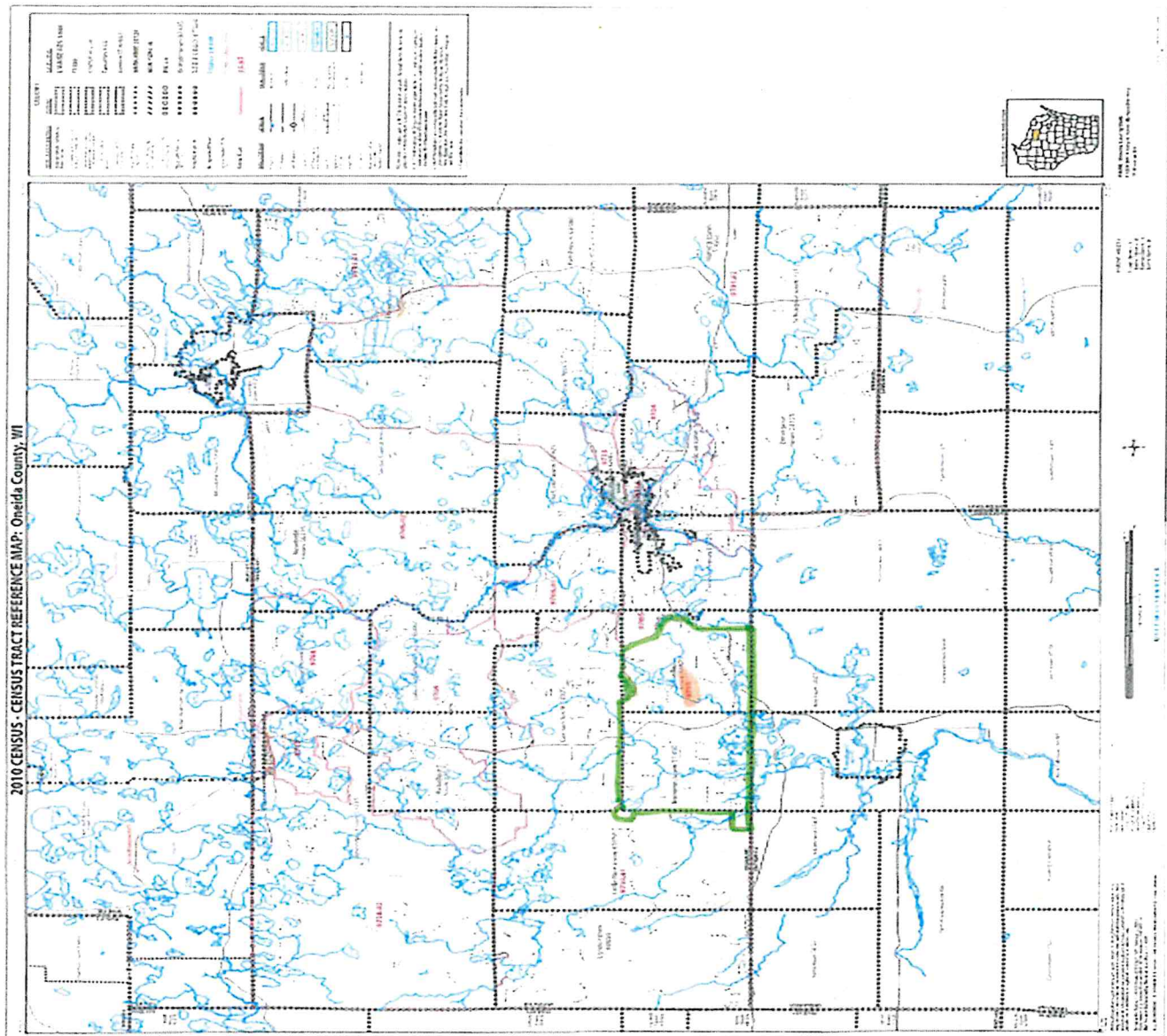
<u>COUNTY CODE</u>		<u>CENSUS TRACT</u>
085 Oneida	Township of Nokomis	9711
069 Lincoln	City of Tomahawk	9602, 9603, 9604, 9605
	City of Merrill	9606, 9607, 9608, 9609, 9610
	Township of Bradley	9601, 9602, 9603, 9604, 9605
	Township of Somo	9603
	Township of Wilson	9603
	Township of King	9601, 9605
	Township of Tomahawk	9603, 9604
	Township of Skanawan	9605
	Township of Harrison	9601, 9605
	Township of Rock Falls	9604, 9607
	Township of Birch	9605, 9607
	Township of Russell	9606
	Township of Harding	9604
	Township of Merrill	9606, 9607, 9608
	Township of Schley	9606, 9607
	Township of Corning	9604
	Township of Scott	9606, 9608, 9610
	Township of Pine River	9606, 9610

To meet regulatory requirements and adhere to the spirit and intent of the Act, the bank's Lending Community/Assessment Area consists only of whole geographies, does not reflect illegal discrimination and does not arbitrarily exclude low or moderate income geographies.

The Bank may adjust the boundaries of its Lending Community/Assessment Area to include portions of a political subdivision that it reasonably can be expected to serve. An adjustment may be particularly appropriate in the case of an area that otherwise would be extremely large, of unusual configuration or divided by significant geographic barriers.

Designation of our community does not mean that we make no loans outside the Lending Community/Assessment Area, as we sometimes do.





PART II: Types of Credit Products and Services Offered

Listed below are the types of loans and services which the Bank makes available. The types of credit we can make available are limited by law and government regulations. Since these can change from time to time, we may temporarily be 'out of the market' for certain types of loans at certain times. Changes in economic conditions may make it impossible to grant certain types of loans at all times.

These types of loans are designed to meet the needs of the areas we serve:

- 1) Residential Mortgage loans for 1-4 family dwelling units (Secondary Market, In House, PMI, FHA, USDA Rural Housing, VA)
- 2) Secondary Housing (both year round and seasonal)
- 3) Investment, non-owner occupied, Rental Property Loans
- 4) Multi Family Loans
- 5) Home Equity/Home Improvement/Home Equity Line of Credit Loans

- 6) Commercial Loans/Real Estate/Equipment/Lines of Credit including SBA and WEBC (WI Economic Development Corp).
- 7) Special purpose mortgage loans for commercial and industrial properties
- 8) Special purpose mortgage loans to various organizations/churches
- 9) Share Loans
- 10) Consumer Loans (Auto, Recreational, etc.)
- 11) Vacant Land Loans
- 12) Construction Loans
- 13) Fast Funds (low cost, unsecured, personal line of credit)
- 14) Student Banking – Private Student Loans via Smart Option Student Loan by Sallie Mae
- 15) Such other credit extensions which may be allowed by regulations and as adopted by the Board of Directors.

Applicants for credit are encouraged and are based on a non-discriminatory basis. The availability, terms and conditions of credit in a specific instance are always decided on a case-by-case basis after the credit worthiness of the borrower(s) and the collateral have both been carefully evaluated. You may obtain a copy of our Management Statement of Lending by merely asking.

These types of **deposit services** are designed to specifically meet the financial needs of the areas we serve, along with many other products and services offered. Our Deposit account services fulfill the needs of individuals, organizations, non-profits, business entities, public municipalities and other public entities:

- 1) Various Personal Checking Account Programs including: Auto-Value; Ca\$h Back; Super Fund; Premium Money Market
- 2) Fresh Start Checking (an account for those with previous checking account challenges, attempting to reach out to re-establish a banking relationship)
- 3) Business Checking Account services
- 4) Business Savings Accounts
- 5) Savings Accounts, Health Savings Accounts, IRA Savings Accounts, Christmas Club Accounts
- 6) Certificates of Deposit for various terms and with low minimum balances for accountholders under 18 years old
- 7) Internet (eBanc) and Mobile (phone) Banking Access
- 8) Electronic Bill Payment Program (ePay+), (iPay/Business Bill Pay)
- 9) ATM and Debit Cards (Fast Check)
- 10) Business ATM/Debit Cards
- 11) ATMs located in lane 1 at the Tomahawk Drive Up location, lane 2 at the Merrill Branch location and in the Tomahawk School Complex commons area
- 12) 24 Hour TeleBanc (phone banking) Program
- 13) IRA/HSA offerings
Including: Traditional; ROTH Contributory; ROTH Conversion; CESA Coverdell Education Savings Account, Simple Individual; Simplified Employee Pension Plan (SEP); Beneficiary IRA (BENE)
- 14) Golden Community Club – special program for seniors 55 + years old
- 15) Youth Accounts – special promotions for our Kids and Teens

Other Services include:

- 1) Safety Deposit Boxes at both locations
- 2) eStatements / eBill
- 3) Online eStatement/eBill Notices Enrollment
- 4) Online Consumer Loan Applications
- 5) Online Mortgage Loan Applications
- 6) Wire Transfer Services
- 7) Switch Kits – personal service transferring accounts and setting up Direct Deposit/Automatic Withdrawals

- 8) Business Showcase – available to Business Customers, Organizations, and Non profits to showcase their business/business products/services
- 9) Online Check Re-orders
- 10) Online Checkbook Balancer
- 11) Online Financial Calculators

Current Fee Schedule: See attached Exhibit A for current Fee Schedule

PART III: Community Reinvestment Act Notice

A Community Reinvestment Act Notice, as required by regulation, is displayed at each Bank location.

PART IV: Efforts to Ascertain and Meet Credit and Services Needs of the Lending Community/Assessment Area

All levels of management are involved in establishing a dialogue with community groups and individuals to receive comment and feedback regarding this bank's CRA performance. Directors, Officers and Employees are encouraged to become active in community organizations and currently have active members in:

- 1) Active participant in activities of the Tomahawk Area Regional Chamber of Commerce
- 2) Active participant in activities with the Merrill Area Chamber of Commerce
- 3) Members of Minocqua, Manitowish Waters, Vilas County Chambers of Commerce
- 4) Tomahawk Mainstreet
- 5) Lions Club
- 6) Eagles Club
- 7) Kiwanis
- 8) Optimists
- 9) Rotary Club
- 10) Sacred Heart St. Mary's Hospital Foundation
- 11) Northwoods Association of Realtors
- 12) American Cancer Society/Ties That Bind Us
- 13) Nicolet Technical College Foundation
- 14) STAR Foundation
- 15) Kinship
- 16) Ambassadors
- 17) City of Tomahawk Community Development Authority
- 18) Tomahawk Community Thrift Store

The Bank works with the Cities of Merrill and Tomahawk and other Lincoln County townships in obtaining state and federal funding for such items as community block grants and other government programs as they may become available and to assist in other community improvements projects as they become necessary.

The Bank utilizes many different sources of news media in our advertising efforts including newspaper, radio, social media, direct mail and mail stuffers to reinforce our corporate identity, to seek growth in deposits and loans and to announce special promotions and services.

Marketing and advertising techniques are used to advertise services beneficial to low and moderate income persons such as the cashing of government checks, low cost checking accounts, Fresh Start checking services, FHLB Down Payment Plus Programs and First Time Home Buyer education. All advertising of products and services includes the 'Equal Housing Lender' and 'Member FDIC' logos.

Bank personnel belong to various trade organizations and attend many seminars and classes on various programs regarding new lending opportunities to remain current on services that would be beneficial to the Bank and the area it serves. Trade Organizations currently a member of include:

- 1) Wisconsin Bankers Association (WBA)
- 2) Independent Community Bankers of America (ICBA)
- 3) Institute of Financial Education – BAI
- 4) Member of FHLB of Chicago
- 5) WFIB (Wisconsin Federation of Independent Businesses)

PART V: Additional Steps to Meet CRA Responsibilities

- 1) The Bank has designated a CRA Officer responsible for supervising and monitoring this bank's overall CRA process according to regulatory requirements
- 2) Investigation of all complaints regarding the Bank's CRA performance and reporting to the BOD
- 3) Imparting information to customers or potential customers regarding federal, state and local assistance programs for small businesses and housing and other similar community needs
- 4) Analysis of loan applications by Board of Directors Fair Lending Committee
- 5) The Bank takes financial literacy initiatives seriously and makes presentations at the Tomahawk and Merrill School Districts along with giving tours of several age levels of students. We participate in the Youth Apprentice and School to Work Programs
- 6) The Bank has established a teaching branch bank at the Tomahawk High School which is operated by students/for students with the supervision of Bank personnel. In addition to the Hatchet Branch, we provide "The Green Machine" ATM in the commons area of the School Complex from which all fees received are donated to the FBLA Future Business Leaders of America) Club.

See Attached Exhibit B – History of Loan to Deposit Ratios

See Attached Exhibit C – Home Mortgage Disclosure Act (HMDA) Notice

We hope the information contained in this statement is useful to you. If you have any questions, do not hesitate to contact us.

In order to continue offering the many services available at Crossbridge Community Bank, we occasionally find it necessary to review our fees and adjust them accordingly. Some of them don't change, but others will due to the rising costs associated with offering these services to our customers. While many of our customers will not be affected by these fees, those that use these special services will see a slight change. We continually strive to provide you with the best and most efficient services available. We're glad you are a part of the Crossbridge Community Bank family and look forward to serving you in the future.

Limits and Fees

<u>Service Charges</u>		<u>Fees</u>
ACH Origination	Changes to Origination	\$2.00
	One-Time Setup Fee	\$10.00
Account Reconciliation or Research		\$20.00/hour (one hour minimum)
Bill Pay (ePay+)	Inactivity Fee	\$5.00/month if NO monthly activity based on <u>calendar month</u>
	Overnight Check Fee	\$14.95 (if available)
	Payment Investigation / Claims Fee	\$29.00
	Same Day Payment Fee	\$9.95 (if available)
	Transaction Fee	10 FREE transactions/month \$0.41/transaction there after
Business Bill Pay	Inactivity Fee	\$10.00/month if NO monthly activity based on <u>initial enrollment date</u>
	Transaction Fee	10 FREE transactions/month \$0.45/transaction there after
Cashiers Checks		\$5.00, \$3.00 Golden Community Club
COD Re-titling Fee		\$5.00
Coin Counting (Loose)	Customers Only	N/C
Collections		\$25.00/item
Collections - Foreign Items (Bank By Mail)		\$5.00/item
Collections - Returned Foreign Items		\$30.00/item
Dormant Accounts	Checking	\$5.00 / Month - An account is dormant if for one year: there have been no deposits or withdrawals to the account and the balance is under \$100.00.
	Savings	\$5.00/Quarter - An account is dormant if for three yrs: there have been no deposits or withdrawals to the account and the balance is under \$100.00.
Early Closure of Account (within 90-Days of date opened)		\$30.00
Fax Service	Customer - Incoming/Outgoing	\$2.00
	Non-Customer - Incoming/Ongoing	\$5.00
Foreign Currency (Order and Return)		\$15.00
Foreign Currency RUSH/OVERNIGHT Order		\$60.00
Garnishment		\$100.00

HSA Termination/Transfer Fee		\$30.00
IRA Termination/Transfer Fee		\$30.00
Levy		\$100.00
Locked Deposit Bag (non-refundable)		\$20.00
Money Orders		\$4.00 , \$2.00 Golden Community Club
Night Depository Box Key (refundable upon return)		\$10.00
Non-Sufficient Funds (NSF) PAID FEE / RETURNED FEE		\$30.00 - Maximum daily fee limit of four transactions created by check, in-person withdrawal or other electronic means. Multiple Non-Sufficient Funds (NSF) Paid Fee / Returned Fee may result when the same transaction is re-presented.
Overdraft Transfer Fee		\$5.00
Photo Copies		(2 free/day) \$.30 each (5 free/day) \$.30 each Golden Community Club
Returned Mail Fee		\$5.00/item
Sight Draft Withdrawal Processing		\$5.00/item
Statement Copy/Transcript Printout		\$2.00/page
Stop Payment - Stop Item Charge		\$30.00, \$10.00 Golden Community Club
Telephone Transfer		\$2.00 or \$2.50 w/receipt, N/C Golden Community Club
VISA Access Card	Initial Card Purchase	\$5.00
	Card Reload	\$4.95
VISA Gift Card		\$3.00
Wire Transfers	Domestic Wire – Incoming/Outgoing	\$20.00
	Foreign Wire – Incoming/Outgoing (US\$ or Foreign Funds)	\$50.00

Check Charges

Check Printing Charges	Check printing charges depend on the style of the checks ordered.
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ATM / Debit Card Charges

All Cards -

Transaction @ Foreign Terminal	\$2.00
Transaction @ Non-Foreign Terminal	N/C
ATM Surcharge (non-customers)	\$2.00
ATM Operator / Network Fees	Varies*

* When you use an ATM not owned by our financial institution, you may be charged a fee by the ATM Operator or any Network used (and you may be charged a fee for a balance inquiry even if you do not complete a funds transfer.)

<i>ATM Cards -</i>	Issue / Replacement Card	\$5.00
<i>Fast Check Debit Card -</i>	Annual Fee	\$5.00/card
	Issue / Replacement Card	\$10.00
	Issue / Re-Issue PIN	\$5.00
<i>Business Debit or HSA Card –</i>	Issue / Replacement Card	\$10.00

Issue / Re-Issue PIN		\$5.00
<i>Rush Order - Business, Fast Check & HSA Debit Cards ONLY</i>		\$35.00/item
<i>All Card - Daily Limits -</i>		
ATM Cards	Dollar Limit	\$200.00 / day
Business Debit Card	Dollar Limit	PIN/Debit \$500.00 / day
		Signature/Credit \$1,000.00 / day
Fast Check Debit Card	Dollar Limit	PIN/Debit \$500.00 / day
		Signature/Credit \$1,000.00 / day
HSA Debit Card	Dollar Limit	PIN/Debit \$1,000.00 / day
		Signature/Credit \$1,000.00 / day

Safe Deposit Boxes (Annual)

Tomahawk Location

3 X 5	\$25.00, \$18.75 Golden Community Club
3 X 10	\$35.00, \$26.25 Golden Community Club
5 X 10	\$50.00, \$37.50 Golden Community Club
10 X 10	\$75.00, \$56.25 Golden Community Club

Merrill Location

3 X 5 X 21	\$25.00, \$18.75 Golden Community Club
5 X 5 X 21	\$30.00, \$22.50 Golden Community Club
3 X 10.5 X 21	\$35.00, \$26.25 Golden Community Club
5 X 10.5 X 21	\$50.00, \$37.50 Golden Community Club
10.5 X 10.5 X 21	\$75.00, \$56.25 Golden Community Club
Safe Deposit Box Late Fee (after 15 days)	\$5.00
One Safe Deposit Box Key Returned upon Closing (Not Refundable)	\$30.00
Forced Entry to Safe Deposit Box	Amount charged by locksmith

Loan Related Fees

Amortization Schedule	\$5.00
Auction Letters	\$10.00
Copy of Tax Receipt	\$5.00
Letters of Credit	\$25.00
Loan Modification Fee – Principal reduction	\$25.00
Loan Modification Fee – Other	\$300.00
Satisfaction of Judgment	\$20.00
Satisfaction of Mortgage	\$30.00
Special Escrow Analysis	\$20.00



EXHIBIT B Loan to Deposit History

RE: Community Reinvestment Act – Public File

To Whom it May Concern:

Per the requirement of the ACT as captioned above, this is to advise the “Public” of the loan to deposit ratio for Crossbridge Community Bank for the dates as stated below:

December 31, 2014	69.75%	\$3.5MM temp deposit tax funds
March 31, 2015	74.84%	
June 30, 2015	75.20%	
September 30, 2015	76.16%	
December 31, 2015	72.13%	\$5MM temp deposit tax funds
March 31, 2016	75.83%	
June 30, 2016	75.44%	
September 30, 2016	72.83%	
December 31, 2016	80.37%	merged with MFSL n/k/a MCB eff 11/5/16
March 31, 2017	82.75%	
June 30, 2017	84.30%	
September 30, 2017	84.42%	
December 31, 2017	83.05%	
March 31, 2018	92.16%	
June 30, 2018	91.93%	
September 30, 2018	94.89%	
December 31, 2018	91.25%	temp deposit tax funds
March 31, 2019	96.58%	
June 30, 2019	95.07%	
September 30, 2019	96.03%	
December 31, 2019	91.87%	temp deposit tax funds
March 31, 2020	95.91%	
June 30, 2020	86.57%	temp excess funds COVID related
September 30, 2020	81.85%	“
December 31, 2020	73.98%	“
March 31, 2021	73.46%	“
June 30, 2021	71.96%	
September 30, 2021	66.99%	“
December 31, 2021	64.46%	“ along with temp muni tax funds
March 31, 2022	66.08%	“
June 30, 2022	70.22%	“
September 30, 2022	74.31%	
December 31, 2022	79.53%	
March 31, 2023	87.31%	
June 30, 2023	89.64%	
September 30, 2023	93.62%	
December 31, 2023	93.03%	

We also maintain a portfolio of serviced Secondary Market Residential Real Estate Mortgages, in excess of \$80MM.