

Bluff View Bank

CRA Public File

INDEX

Exhibit 1	CRA Policy Statement
Exhibit 2	Assessment Area
Exhibit 3	Banking Offices & Services Offered
Exhibit 4	CRA Performance Evaluation
Exhibit 5	Public Comments
Exhibit 6	Loan to Deposit Ratio
Exhibit 7	HMDA Disclosure Statement

Exhibit 1

CRA Policy Statement

COMMUNITY REINVESTMENT ACT

BLUFF VIEW BANK

A. POLICY STATEMENT:

Bluff View Bank has a long-standing commitment to corporate responsibility as an organization dedicated to the economic well being of the communities which we serve. In fulfilling this obligation, the Bank will implement programs and initiatives that are fair, equitable, and within the limits of sound banking practices.

Our efforts will include, but not be limited to, the following:

1. Promote, through involvement with both public and private bodies and groups, revitalization efforts for business and residential districts, including low- and moderate-income neighborhoods;
2. Respond to consumer and business credit needs in all areas served by our offices;
3. Support revenue needs of state and local governments, authorities, and boards; and
4. Advance the cause of community improvement through contributions of time, talent, and/or financial assistance to civic and community projects, youth organizations, farm groups, senior citizens and others.

B. DELINEATION OF COMMUNITY

A map is attached showing the local community in which this bank is located. In Trempealeau County, the local community includes portions or all of Gale, Caledonia, Trempealeau, Dodge and Ettrick Townships, City of Galesville and the unincorporated community of Centerville and Village of Trempealeau as shown on the map. Census tracts included are 1007 and 1008. In La Crosse County, the community includes portions or all of Holland, Farmington, Hamilton, Onalaska, Campbell, Medary and the cities of Onalaska, Holmen and La Crosse. Census tracts included are 102.02, 102.03, 102.04, 102.05, 104.01, 104.03, and 104.04. These census tracts service all three branch locations.

The bank's main office is located in Galesville with banking hours consistent with the needs of the customers. Walk-up and drive-up facilities are available in addition to the main lobby. In addition, 24-hour banking service is provided with an ATM located in the Galesville facility and extended service is provided to customers in the Trempealeau area with a banking office and ATM. A full-service banking branch is also available in Village of Holmen as well as 24-hour service via ATM.

Adapted by Board of Directors 6/19/90; Adopted & Reviewed by Board of Directors 7/15/91, 10/18/93, 1/16/95, approved as presented 12/18/97, revised/approved 12/23/98, 12/23/99, 12/28/00, 12/27/01, 12/26/02, 12/29/03, 12/29/04, approved as presented 12/28/05, revised/approved 12/27/06, 12/27/07, 12/29/08, 3/23/10, 3/15/11, 3/27/2012, 3/26/13, 3/25/14,6/24/14, approved as presented 3/24/15, revised/approved 5/22/16, 3/28/17,3/27/18, 3/26/19, 3/24/20, 3/23/21, 3/22/22, 3/28/23, approved as presented 3/26/24, 3/25/25, revised/approved 11/25/25: approved as presented 3/24/26

C. CRA PUBLIC FILE AVAILABILITY

Requests by the general public for a copy of the information contained within this public file pertaining to the assessment area will be made available, free of charge, within five (5) calendar days of the request.

Exhibit 2

Assessment Area

Adapted by Board of Directors 6/19/90; Adopted & Reviewed by Board of Directors 7/15/91, 10/18/93, 1/16/95, approved as presented 12/18/97, revised/approved 12/23/98, 12/23/99, 12/28/00, 12/27/01, 12/26/02, 12/29/03, 12/29/04, approved as presented 12/28/05, revised/approved 12/27/06, 12/27/07, 12/29/08, 3/23/10, 3/15/11, 3/27/2012, 3/26/13, 3/25/14, 6/24/14, approved as presented 3/24/15, revised/approved 5/22/16, 3/28/17, 3/27/18, 3/26/19, 3/24/20, 3/23/21, 3/22/22, 3/28/23, approved as presented 3/26/24, 3/25/25, revised/approved 11/25/25: approved as presented 3/24/26

Bluff View Bank

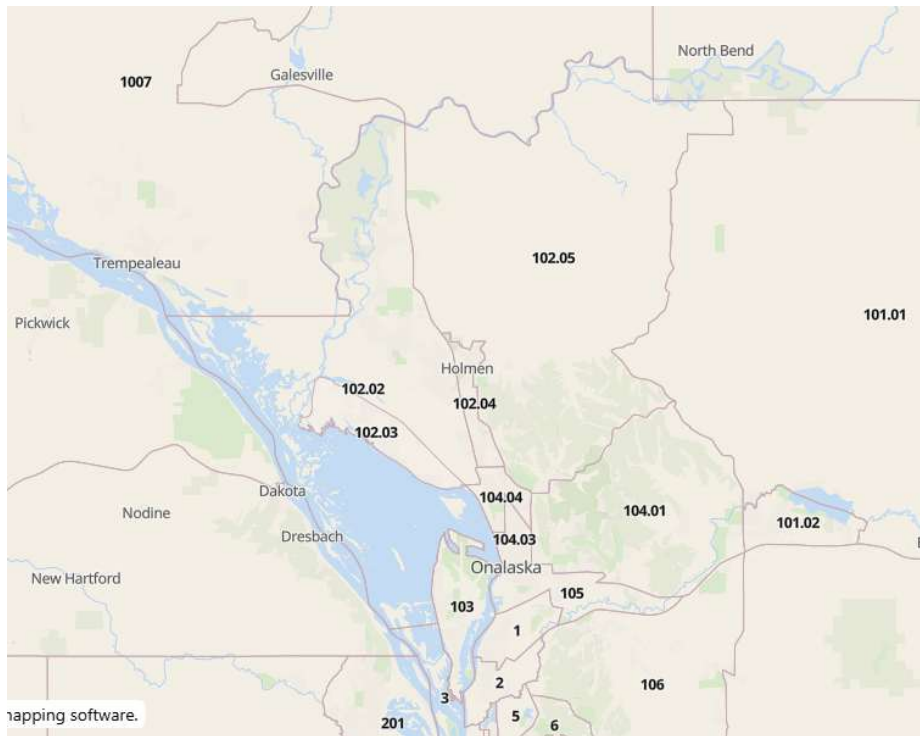


Exhibit 3

Banking Offices & Services Offered

Adapted by Board of Directors 6/19/90; Adopted & Reviewed by Board of Directors 7/15/91, 10/18/93, 1/16/95, approved as presented 12/18/97, revised/approved 12/23/98, 12/23/99, 12/28/00, 12/27/01, 12/26/02, 12/29/03, 12/29/04, approved as presented 12/28/05, revised/approved 12/27/06, 12/27/07, 12/29/08, 3/23/10, 3/15/11, 3/27/2012, 3/26/13, 3/25/14,6/24/14, approved as presented 3/24/15, revised/approved 5/22/16, 3/28/17,3/27/18, 3/26/19, 3/24/20, 3/23/21, 3/22/22, 3/28/23, approved as presented 3/26/24, 3/25/25, revised/approved 11/25/25: approved as presented 3/24/26

BLUFF VIEW BANK OFFICES

LOCATION	HOURS	
MAIN OFFICE 16893 S. Main Street Galesville, WI 54630	Drive up	9:00 - 5:00 p.m. M-F 9:00 - noon Sat.
	Lobby	9:00 - 4:00 p.m. M-F Closed Sat.
	Walk-up	4:00 - 5:00 p.m. M-F 9:00 - noon Sat.
Trempealeau Office 24480 Third Street Trempealeau, WI 54661	Drive up	9:00 - 5:00p.m. M-F 9:00 - noon Sat
	Lobby	9:00 - noon (closed noon-1:00) 1:00 - 4:00p.m. M-F Closed Sat.
Holmen Office 1749 Spakenburg Road Holmen, WI 54636	Drive up	9:00 - 5:00 p.m. M-F 9:00 - noon Sat.
	Lobby	9:00 - 4:00 p.m. M-F Closed Sat.

The above represent all offices of Bluff View Bank

Adapted by Board of Directors 6/19/90; Adopted & Reviewed by Board of Directors 7/15/91, 10/18/93, 1/16/95, approved as presented 12/18/97, revised/approved 12/23/98, 12/23/99, 12/28/00, 12/27/01, 12/26/02, 12/29/03, 12/29/04, approved as presented 12/28/05, revised/approved 12/27/06, 12/27/07, 12/29/08, 3/23/10, 3/15/11, 3/27/2012, 3/26/13, 3/25/14, 6/24/14, approved as presented 3/24/15, revised/approved 5/22/16, 3/28/17, 3/27/18, 3/26/19, 3/24/20, 3/23/21, 3/22/22, 3/28/23, approved as presented 3/26/24, 3/25/25, revised/approved 11/25/25: approved as presented 3/24/26

SERVICES OFFERED

A full range of banking services are offered at the main banking office of Bluff View Bank located at 16893 S. Main Street in Galesville, WI. These include deposit, loan, safe deposit, investment and insurance services. Investment and insurance services are marketed by Bluff View Investment Solutions and are offered through CETERA Investment Services located at the main office of Bluff View Bank.

The Trempealeau office offers a full range of deposit services. The Trempealeau office also offers a full range of loan services by appointment.

The Holmen office offers a full range of deposit and loan services. Investment and insurance services are marketed by Bluff View Investment Solutions and are offered through CETERA Investment Services

ATMs are located at all three offices for customer convenience. Internet banking, mobile banking, mobile deposit and telephone banking services are offered to all customers.

Exhibit 4

CRA Performance Evaluation

PUBLIC DISCLOSURE

January 20, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bluff View Bank
Certificate Number: 8693

16893 S Main St
Galesville, Wisconsin 54630

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.

TABLE OF CONTENTS

INSTITUTION RATING.....	1
DESCRIPTION OF INSTITUTION.....	1
DESCRIPTION OF ASSESSMENT AREAS	2
SCOPE OF EVALUATION	3
CONCLUSIONS ON PERFORMANCE CRITERIA	4
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	5
NON MSA AA – Full-Scope Review	6
MSA AA– Full-Scope Review.....	11
APPENDICES.....	17
SMALL BANK PERFORMANCE CRITERIA	17
GLOSSARY	18

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 rating is supported by the following conclusions:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- The bank originated a majority of home mortgage, small business, and small farm loans in the AA.
- The AA does not include any low- and moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.
- The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among individuals of different income levels (including low- and moderate - income) and businesses and farms of different sizes.
- The institution did not receive any CRA-related complaints during the review period; therefore, this criterion did not affect the CRA rating.

DESCRIPTION OF INSTITUTION

Bluff View Bank (BVB) maintains three offices, with a main office in Galesville, and branches in Holmen and Trempealeau, Wisconsin. BVB remains wholly owned by Gale Bank Holding Company, Inc., a one-bank holding company domiciled in Galesville, Wisconsin. The bank does not have any affiliates that offer credit products. There have been no significant changes to the bank's service locations, AAs, or ownership structure since the last evaluation. BVB received a "Satisfactory" rating at its previous FDIC Performance Evaluation, dated September 14, 2020, based on Interagency Small Institution Examination Procedures.

BVB offers traditional loan and deposit products. Lending products include residential mortgage, commercial, agriculture, and consumer loans. Deposit services include checking, savings, money market, and certificates of deposit. Alternative banking services include internet banking, electronic bill-pay, and proprietary ATMs. Although the bank offers all credit products throughout its AAs, small farm lending is no longer a primary lending product in the metropolitan areas given the limited lending opportunities.

From the last evaluation on September 14, 2020 to September 30, 2025, the bank's total assets grew from \$121 million to \$160 million; net loans grew from \$80.6 million to \$96.6 million; and total deposits grew from \$91.5 million to \$131.8 million.

As disclosed in the following breakdown of BVB’s loan portfolio, residential, agricultural and commercial lending represent significant portfolio holdings. With the exception of agricultural lending, which is a primary lending product only in nonmetropolitan areas, these products are the bank’s primary credit offerings in each AA. The bank’s lending focus has not changed since the prior evaluation.

Loan Portfolio Distribution as of 9/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	\$6,024	6.2
Secured by Farmland	\$16,736	17.1
Secured by 1-4 Family Residential Properties	\$26,087	26.7
Secured by Multifamily (5 or more) Residential Properties	\$3,633	3.7
Secured by Nonfarm Nonresidential Properties	\$21,225	21.7
Total Real Estate Loans	\$73,705	75.5
Commercial and Industrial Loans	\$10,759	11.0
Agricultural Production and Other Loans to Farmers	\$8,398	8.6
Consumer Loans	\$3,740	3.8
Obligations of State and Political Subdivisions in the U.S.	\$66	0.1
Other Loans	\$1,008	1.0
Total Loans	\$97,676	100.0
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0%.</i>		

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

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its CRA performance. BVB designated two contiguous AAs. One AA is located in the non-metropolitan statistical area (MSA) of the state and includes two middle-income census tracts in Trempealeau County. This will be referred to as the Non MSA AA in this evaluation. The Non MSA AA includes the bank’s main office as well as an office within the village of Trempealeau. The second AA includes seven census tracts in northern La Crosse County, which are part of the La Crosse MSA. The MSA includes a single office in Holmen.

Additional demographic information is presented in the AA sections that follow.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated September 14, 2020, to the current evaluation dated January 20, 2026. Examiners used the Interagency Small Institution Examination Procedures to evaluate the institution's performance. These procedures consist of the Lending Test. The appendices include details on the small bank performance criteria for this test and a glossary that provides pertinent definitions.

Both the bank's AAs received a full-scope review. Examiners placed more weight and consideration on the bank's performance in the Non MSA AA, as the Non MSA AA includes a majority of the bank offices and overall deposit and lending activity.

Activities Reviewed

Examiners determined that the bank's major product lines are home mortgage, small business, and small farm loans. This conclusion considered the bank's business strategy, the number and dollar volume of loans originated during the evaluation period, and bank management's comments. No other types of loan products, such as consumer loans, represent a major product line and, therefore, were not considered in this evaluation. In addition, examiners determined that small farm loans are not a primary product in the MSA AA; therefore, were not evaluated in that specific AA. Examiners assigned greater weight to home mortgage loans, followed by small business loans, then small farm loans. This is based on the bank's lending strategy, loan volume, and call report composition.

Examiners reviewed home mortgage loans by analyzing the full universe of the 2022, 2023, and 2024 home mortgage loans reported pursuant to the requirements of the Home Mortgage Disclosure Act (HMDA). The bank reported 62 home mortgage loans totaling \$12.7 million in 2022, 55 home mortgage loans totaling \$11.7 million in 2023, and 61 home mortgage loans totaling \$13.2 million in 2024. Examiners compared the 2024 home mortgage loan data to 2020 U.S. Census data and 2024 HMDA aggregate lending data. Examiners focused more on the comparison to aggregate lending data for the home mortgage loan analyses, as aggregate lending data provides an insight into the demand for home mortgage loans within the AAs.

For small business and small farm loans, examiners reviewed the full universe of loan originations occurring from January 1, 2025, through December 31, 2025. The bank originated or renewed 88 small business loans totaling \$13.2 million in 2025. The bank originated or renewed 63 small farm loans totaling \$8.9 million in 2025. This activity is considered representative of the bank's general lending performance for both categories of loans throughout the evaluation period. The 2024 D&B data and 2020 U.S. Census data provided standards of comparison for the small business and small farm loan performance.

Examiners analyzed the number and dollar volume of home mortgage, small business, and small farm loans. While both the number and dollar volume of loans are presented, examiners

emphasized performance by number of loans originated, as that is a better indicator of the number of individuals, small businesses, and small farms served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test is rated “Satisfactory.” See each separate AA analysis for performance details.

Loan-to-Deposit Ratio

The LTD ratio is reasonable (considering seasonal variations and lending related activities) given the institution’s size, financial condition, and AA credit needs. The ratio, calculated from Call Report data, averaged 77.8 percent over the past 21 calendar quarters from September 30, 2020, to September 30, 2025. The ratio fluctuated during the evaluation period, dropping from a high of 88.1 percent as reported in the third quarter of 2020 down to 70.4 percent as of June 30, 2022. The ratio then rose to 85.9 percent in the third quarter of 2023 and ultimately declined again to 73.3 percent in the third quarter of 2025.

Despite the fluctuations, BVB's average LTD ratio was within the range of comparable institutions, as shown in the following table. Examiners selected comparable institutions based on their asset size, portfolio percentages, and geographic location.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 9/30/2025 (\$000s)	Average Net LTD Ratio (%)
Bluff View Bank	121,008	77.8
Similarly-Situated Institution #1	54,439	103.2
Similarly-Situated Institution #2	196,474	72.6
Similarly-Situated Institution #3	221,399	73.7
Similarly-Situated Institution #4	247,176	63.5
Similarly-Situated Institution #5	309,826	84.1
Similarly-Situated Institution #6	360,636	83.7
Similarly-Situated Institution #7	487,779	72.2
<i>Source: Reports of Condition and Income 9/30/2020 – 9/30/2025</i>		

Assessment Area Concentration

As reflected in the table that follows, BVB originated a majority of home mortgage, small business, and small farm loans, by number and dollar volume, within its AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	43	69.4	19	30.6	62	7,485	59.0	5,195	41.0	12,680
2023	36	65.5	19	34.5	55	7,210	61.5	4,505	38.5	11,715
2024	37	60.7	24	39.3	61	8,865	67.0	4,370	33.0	13,235
Subtotal	116	65.2	62	34.8	178	23,560	62.6	14,070	37.4	37,630
Small Business										
2025	57	64.8	31	35.2	88	9,360	71.0	3,828	29.0	13,188
Small Farm										
2025	47	74.6	16	25.4	63	6,485	72.7	2,439	27.3	8,924
<i>Source: Bank Data , 2025 HMDA is not available Due to rounding, totals may not equal 100.0%.</i>										

Geographic Distribution

The AAs do not include any low- and moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among individuals of different income levels (particularly moderate-income); as well as businesses and farms of different sizes. The conclusion is supported primarily by reasonable home mortgage lending performance in the more heavily weighted Non MSA AA, reasonable small business lending in both AAs, and reasonable small farm lending in the Non MSA AA.

Performance was not consistent throughout the AAs. Specifically, home mortgage lending performance was reasonable in the Non MSA AA but poor in the MSA AA.

Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test 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 substantive discriminatory or other illegal credit practices.

NON MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NON MSA ASSESSMENT AREA

The Non MSA AA includes the two most southern-census tracts in Trempealeau County, Wisconsin. There have been no changes to the AA during the review period.

Sources for the data used in this section include the Federal Financial Institutions Examination Council (FFIEC), 2020 U.S. Census, D&B, Wisconsin Realtors Association, State of Wisconsin Department of Workforce Development, and the U.S. Bureau of Labor Statistics.

Economic and Demographic Data

The following table illustrates key demographic characteristics of the AA.

Demographic Information of the Assessment Area Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	9,490	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,373	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,120	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	918	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	335	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	707	0.0	0.0	100.0	0.0	0.0
Farms by Geography	61	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,584	13.9	16.9	23.0	46.1	0.0
Household Distribution by Income Level	4,038	16.8	17.1	20.7	45.4	0.0
Wisconsin Non MSA Median Family Income		\$71,403	Median Housing Value			\$ 179,981
			Median Gross Rent			\$833
			Families Below Poverty Level			3.3%
<i>Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

There are 4,373 housing units in the AA, of which 71.4 percent are owner-occupied, 21.0 percent are rentals, and 8.1 percent are vacant.

The FFIEC median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper -income categories are presented in the following table.

Wisconsin Non-MSA Median Family Income				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024 (\$86,700)	<\$43,350	\$43,350 To <\$69,360	\$69,360 To <\$104,040	≥\$104,040
2023 (\$86,000)	<\$43,000	\$43,000 To <\$68,800	\$68,800 To <\$103,200	≥\$103,200
2022 (\$81,500)	<\$40,750	\$40,750 To <\$65,200	\$65,200 To <\$97,800	≥\$97,800

Source: FFIEC

As the following table shows, unemployment rates in Trempealeau County have decreased during the evaluation period. This is consistent with the State of Wisconsin unemployment rates.

Unemployment Rates					
Area	Annual 2021 %	Annual 2022 %	Annual 2023 %	Annual 2024 %	November 2025 %
Trempealeau County	3.8	3.1	3.2	3.2	2.5
State of Wisconsin	3.8	2.8	2.8	3.0	2.7
United States	5.3	3.6	3.8	4.3	4.3

Source: Bureau of Labor and Statistics

During the evaluation period, annual home sales varies but generally declined, while the median home prices rose considerably. The following table provides home sales and cost data. This information indicates that housing affordability may be challenging for low- and moderate-income individuals.

Home Sales and Median Housing Prices (Trempealeau County)		
Year	Total Annual Sales	Median Sales Price
2021	367	\$185,750
2022	328	\$213,750
2023	227	\$219,250
2024	311	\$242,825
2025	284	\$245,725

Source: Wisconsin Realtors Association

According to D&B data, there were 707 businesses operating in the AA. Most of these businesses (65.9 percent) have four or fewer employees and 94.3 percent operate from a single location. Nonclassified businesses represent the largest portion of AA businesses (24.7 percent); followed by Services excluding Public Administration (9.5 percent); and Agriculture, Forestry, Fishing and Hunting (7.9 percent). No employer within this AA exceeds 100 employees. The largest employers in this AA include BCS Automotive Interface, Marinuka Manor Nursing Home, Eden House, and the Gale-Ettrick-Trempealeau School District.

Competition

There is modest competition in Trempealeau County for banking services. According to the June 30, 2025 FDIC Deposit Market Share Report, there are 8 institutions with 16 offices competing for

approximately \$688 million deposits. In this market, BVB ranks 4th with 14.3 percent of the deposit market share.

There is moderate competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2024, 57 HMDA lenders reported 236 home mortgage loans with an average loan size of \$199,000. BVB ranked 2nd out of AA reporters, with a market share of 10.2 percent. A credit union is the most prominent home mortgage lender in the Non MSA AA, with a 23.3 percent market share and an average loan balance of \$179,000.

There is modest competition in this AA for small business loans. The bank is not required to collect and report small business data, and opted not to do so; however, aggregate small business lending data provides insight into related loan demand and opportunities within the AA. According to the 2024 aggregate small business lending data, the most recent year available, there were 29 reporting institutions within Trempealeau County that originated or renewed 229 small business loans. The five most prominent small business lenders accounted for 69.9 percent of all reported loans.

There is modest competition in this AA for small farm loans. The bank is not required to collect and report small farm data, and opted not to do so; however, aggregate small farm lending data provides insight into related loan demand and opportunities within the AA. According to the 2024 aggregate small farm lending data, the most recent year available, there were 16 reporting institutions within Trempealeau County that originated or renewed 57 small farm loans. The most prominent small farm lender accounted for 49.1 percent of all reported loans.

Credit Needs

Considering information from bank management, demographic data, and economic data, examiners determined that home mortgage loans, small business loans, and small farm loans represent primary credit needs for the Non MSA AA. This is based on demographic information, such as limitations in affordable housing, the presence of businesses operating in one location with four or fewer employees, as well as the presence of small farms.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NON MSA ASSESSMENT AREA

LENDING TEST

BVB demonstrated reasonable performance under the Lending Test within the Non MSA AA.

Borrower Profile

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

Home Mortgage

The bank's home mortgage lending in the Non MSA AA is reasonable. During the review period, the bank originated one loan each year to low-income borrowers. The low-income borrower segment includes 3.3 percent of AA families in poverty. Without substantial subsidies, these impoverished families would not qualify for a traditional mortgage loan. Therefore, lending expectations and opportunities are more consistent with the HMDA aggregate benchmarks.

The bank’s performance was stronger in the moderate-income borrower segment where the bank originated between four to six loans each year, exceeding the aggregate HMDA data slightly in 2022, significantly in 2023, and was comparable in 2024. This performance reflects reasonable overall performance.

Distribution of Home Mortgage Loans by Borrower Income Level Non MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	14.1	8.7	1	3.7	85	2.1
2023	14.1	10.3	1	4.6	125	3.2
2024	13.9	6.4	1	4.2	35	0.7
Moderate						
2022	17.0	17.8	5	18.5	505	12.3
2023	17.0	18.3	6	27.3	540	13.9
2024	16.9	17.4	4	16.7	740	13.8
Middle						
2022	23.1	26.2	8	29.6	850	20.7
2023	23.1	23.0	3	13.6	505	13.0
2024	23.0	19.9	6	25.0	1,240	23.1
Upper						
2022	45.8	38.9	11	40.7	2,515	61.1
2023	45.8	42.3	8	36.4	1,200	30.9
2024	46.1	44.5	10	41.7	2,160	40.3
NA						
2022	0.0	8.4	2	7.4	160	3.9
2023	0.0	6.1	4	18.2	1,510	38.9
2024	0.0	11.9	3	12.5	1,185	22.1
Total						
2022	100.0	100.0	27	100.0	4,115	100.0
2023	100.0	100.0	22	100.0	3,880	100.0
2024	100.0	100.0	24	100.0	5,360	100.0

*Source: 2020 Census; Bank Data, as reported; 2025 HMDA is not available., 2024, 2023, and 2022 HMDA data
Due to rounding, totals may not equal 100.0%.*

Small Business

The distribution of small business loans reflects reasonable penetration among businesses of different sizes in the Non MSA AA. As the following table details, the bank’s small business lending is comparable to the D&B demographic data.

Distribution of Small Business Loans by Gross Annual Revenue Category Non MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	90.1	32	91.4	5,585	91.6
> \$1,000,000	2.0	3	8.6	515	8.4
Revenue Not Available	7.9	0	0.0	0	0.0
Total	100.0	35	100.0	6,100	100.0
<i>Source: 2024 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

Small Farm

The distribution of small farm loans reflects reasonable penetration among farms of different sizes in the Non MSA AA. The D&B demographic shows the percentage of small farms in the AA with less than \$1 million in gross annual revenues (GARs); however, it does not necessarily reflect demand for such loans. Therefore, examiners considered the performance of similarly situated institutions to determine if the bank’s performance was consistent with demand. Although the bank trails the demographic data, the bank’s performance is consistent with three similarly situated institutions and is reasonable.

Distribution of Small Farm Loans by Gross Annual Revenue Category Non MSA AA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<= \$1,000,000	98.4	36	76.6	3,680	56.8
> \$1,000,000	1.6	11	23.4	2,805	43.3
Total	100	47	100.0	6,485	100.0
<i>Source: 2024 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

MSA AA– Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MSA ASSESSMENT AREA

The MSA AA consists of seven census tracts in La Crosse County (three middle - and four upper - income tracts) and houses one branch in Holmen. The number of census tracts included in the AA increased from five to seven during the review period as a result of population growth requiring two census tracts to split into four. The boundaries of the AA remains unchanged.

Sources for the data used in this section include the FFIEC, 2020 U.S. Census, D&B, Wisconsin Realtors Association, State of Wisconsin Department of Workforce Development, and the U.S. Bureau of Labor Statistics.

Economic and Demographic Data

The following table illustrates key demographic characteristics of the AA.

Demographic Information of the Assessment Area						
MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	7	0.0	0.0	42.9	57.1	0.0
Population by Geography	36,240	0.0	0.0	35.7	64.3	0.0
Housing Units by Geography	13,945	0.0	0.0	39.2	60.9	0.0
Owner-Occupied Units by Geography	9,920	0.0	0.0	34.9	65.1	0.0
Occupied Rental Units by Geography	3,665	0.0	0.0	50.8	49.2	0.0
Vacant Units by Geography	360	0.0	0.0	36.1	63.9	0.0
Businesses by Geography	2,412	0.0	0.0	25.5	74.5	0.0
Farms by Geography	58	0.0	0.0	27.6	72.4	0.0
Family Distribution by Income Level	9,462	9.9	15.8	23.8	50.5	0.0
Household Distribution by Income Level	13,585	11.6	14.4	17.8	56.1	0.0
Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA		\$78,648	Median Housing Value		\$ 231,104	
			Median Gross Rent		\$936	
			Families Below Poverty Level		1.8%	
<i>Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

There are 13,945 housing units in the AA, of which 71.1 percent are owner-occupied, 26.3 percent are rentals, and 2.6 percent are vacant.

The FFIEC median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper -income categories are presented in the following table.

Median Family Income Ranges La Crosse MSA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024 (\$97,600)	<\$48,800	\$48,800 To <\$78,080	\$78,080 To <\$117,120	≥\$117,120
2023 (\$93,400)	<\$46,700	\$46,700 To <\$74,720	\$74,720 To <\$112,080	≥\$112,080
2022 (\$90,800)	<\$45,400	\$45,400 To <\$72,640	\$72,640 To <\$108,960	≥\$108,960

Source: FFIEC

As the following table shows, unemployment rates in La Crosse County have been decreasing steadily during the evaluation period. This is consistent with the State of Wisconsin unemployment rates.

Unemployment Rates					
Area	Annual 2021 %	Annual 2022 %	Annual 2023 %	Annual 2024 %	November 2025 %
La Crosse County	3.2	2.5	2.4	2.6	2.4
State of Wisconsin	3.8	2.8	2.8	3.0	2.7
United States	5.3	3.6	3.8	4.3	4.3

Source: Bureau of Labor and Statistics

During the evaluation period, annual home sales declined but slightly increased after 2023, while the median home prices rose by 33.0 percent between 2021 and 2025. The following table provides home sales and cost data. This information indicates that housing affordability may be challenging for low- and moderate-income individuals.

Home Sales and Median Housing Prices (La Crosse County)		
Year	Total Annual Sales	Median Sales Price
2021	1,623	\$234,500
2022	1,521	\$263,225
2023	1,234	\$271,750
2024	1,307	\$302,000
2025	1,333	\$311,900

Source: Wisconsin Realtors Association

According to D&B data, there were 2,412 businesses operating in the AA. Most of these businesses (64.5 percent) have four or fewer employees and 93.8 percent operate from a single location. Nonclassified businesses represent the largest portion of AA businesses (24.8 percent); followed by Real Estate Rental and Leasing (9.3 percent); and Professional, Scientific, and Technical Services (7.4 percent). No employer in the bank’s AA has more than 250 employees. The largest employers in this AA include Northern Engraving Corp, Holmen High School, and Holmen Village Parks & Rec.

Competition

There is robust competition in La Crosse County for banking services. According to the June 30, 2025, FDIC Deposit Market Share Report, there are 17 institutions with 38 offices competing for

approximately \$3.5 billion deposits. In this market, BVB ranks 15th with 0.8 percent of the deposit market share.

There is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2024, 125 HMDA lenders reported 988 home mortgage loans with an average loan size of \$305,000. BVB ranked 18th out of AA reporters, with a market share of 1.3 percent. A credit union is the most prominent home mortgage lender and accounted for 36.5 percent of total market share with an average loan balance of \$232,000.

There is significant competition in this AA for small business loans. According to the 2024 aggregate small business lending data, the most recent year available, there were 54 reporting institutions within La Crosse County that originated 1,498 small business loans. The five most prominent small business lenders accounted for 73.9 percent of all originations.

Community Contact

Examiners contacted a quasi-public small business development center knowledgeable about small business formation and credit needs in the AA. According to the contact, small business formation increased during the COVID pandemic and many small businesses took advantage of low-interest loans offered through the Small Business Administration's paycheck protection program. Traditional store-front small businesses suffered reduced retail traffic as a result of the pandemic and pivoted to increase internet-based sales. Pandemic related economic pressure has since subsided. The contact believed that there is a need and interest for credit products and programs that assist with sustainable small business capital formation.

Credit Needs

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage and small business loans represent primary credit need for the MSA AA. The significant percentage of businesses with GARs of \$1 million or less support this conclusion.

Examiners reviewed La Crosse county-wide data from the USDA's 2022 Census of Agriculture on farm debt and farm operator primary occupation and determined that small farm lending is not a primary need or primary bank product in the MSA AA. According to the 2022 Census of Agriculture, the most recent available report, a substantial majority of La Crosse County farm operators do not carry debt or pay interest expense (80 percent) and list farming as a secondary occupation (60 percent) which results in limited opportunities to provide traditional agricultural loans.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MSA ASSESSMENT AREA

LENDING TEST

Overall, the bank's lending test performance in the MSA AA is poor. Although the bank's performance in the AA shows reasonable small business performance, the bank's lending to low- and moderate-income families for home mortgage loans is inconsistent with the performance in the Non MSA AA. As previously discussed, small farm lending was not determined to be a primary credit need or product line in this AA. Therefore, overall MSA AA performance is based on home mortgage lending and small business lending.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, poor penetration among individuals of different income levels but reasonable penetration to businesses of different sizes.

Home Mortgage

The distribution of borrowers reflects poor penetration among individuals of different income levels. As reflected in the following table, the bank did not originate any loans to the low-income borrower segment. Examiners place more weight on performance compared to aggregate data as this is more reflective of demand; however, the absence of lending to low-income borrowers results in the bank trailing aggregate between 5.9 and 7.5 percentage points in each year.

The bank's performance in the moderate-income borrower segment consistently trails aggregate performance and the percentage of moderate-income families. Examiners identified a prominent market leader, a credit union with a market share ranging between 36.5 and 41.7 percent in the years presented, that may be augmenting aggregate performance for low- and moderate-income lending. However, further analysis concluded that there is no disproportionate lending with this market leader and the aggregate performance is minimally impacted when removing the credit unions lending. Therefore, the BVB's performance notably trails all competition in this AA.

Distribution of Home Mortgage Loans by Borrower Income Level MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	10.7	7.5	0	0.0	0	0.0
2023	10.7	6.5	0	0.0	0	0.0
2024	9.9	5.9	0	0.0	0	0.0
Moderate						
2022	16.7	16.2	1	6.3	205	6.1
2023	16.7	14.1	1	7.1	115	3.5
2024	15.8	14.1	1	7.7	250	7.1
Middle						
2022	25.0	25.2	5	31.3	885	26.3
2023	25.0	26.4	4	28.6	440	13.2
2024	23.8	23.0	0	0.0	0	0.0
Upper						
2022	47.6	42.5	6	37.5	1,030	30.6
2023	47.6	45.0	7	50.0	1,755	52.7
2024	50.5	--	9	69.2	2,010	57.2
NA						
2022	0.0	8.6	4	25.0	1,250	37.1
2023	0.0	8.0	2	14.3	1,020	30.6
2024	0.0	11.3	3	23.1	1,257	35.7
Total						
2022	100.0	100.0	16	100.0	3,370	100.0
2023	100.0	100.0	14	100.0	3,330	100.0
2024	100.0	100.0	13	100.0	3,517	100.0

*Source: 2020 Census; Bank Data, as reported; 2025 HMDA is not available., 2024, 2023, and 2022 HMDA Data
Due to rounding, totals may not equal 100.0%.*

Small Business

The bank’s small business lending in the MSA AA is reasonable. Although the bank’s small lending performance trailed 2025 D&B demographics for businesses with GARs at or below \$1 million, the 2025 D&B demographic discloses the percentage of businesses at or below the \$1 million GAR segment, but it does not necessarily reflect segment loan demand. Examiners compared the bank’s performance to three similarly situated institutions and determined that the bank’s lending is consistent with similar banks in the AA.

Distribution of Small Business Loans by Gross Annual Revenue Category MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	89.0	15	68.2	1,769	54.3
> \$1,000,000	3.2	7	31.8	1,491	45.7
Revenue Not Available	7.8	0	0.0	0	0.0
Total	100	22	100.0	3,260	100.0
<i>Source: 2024 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

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 institution'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 institution 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.

Exhibit 5
Public Comments

Exhibit 6

Loan to Deposit Ratio

LOAN TO DEPOSIT RATIO

The Loan to Deposit Ratio of a bank measures the usage of a bank's deposits to make loans. The Loan to Deposit Ratio is calculated by dividing the total amount of loans less the allowance for loan and lease losses by the total amount of deposits. Generally speaking the higher the ratio the more the bank is converting its deposits into loans. The lower the ratio the more the bank is converting its deposits into other assets such as investments. Many factors contribute to that decision with one of the most important ones being loan demand in the bank's immediate market area. A higher loan to deposit ratio is a reflection on the bank's desire to meet the credit needs of its customers.

The Loan to Deposit Ratio for Bluff View Bank for the past two years by quarter is as follows:

<u>Date</u>	<u>Net Loan to Deposit Ratio</u>
12/31/2023	81.99%
3/31/2024	80.62%
6/30/2024	81.91%
9/30/2024	74.09%
12/31/2024	73.20%
3/31/2024	72.63%
6/30/2025	74.15%
9/30/2025	73.33%
12/31/2025	81.11%

Exhibit 7
HMDA Disclosure Statement



Bluff View Bank

Focused On You

Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data shows geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. This data is available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.

16893 S. Main Street
Galesville, WI 54630
(608) 582-2233

24480 Third Street
Trempealeau, WI 54661
(608) 534-7780

1749 Spakenburg Road
Holmen, WI 54636
(608) 526-6483



www.bluffviewbank.com