

PUBLIC DISCLOSURE

June 17, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Frandsen Bank & Trust
116 Central Street West
Lonsdale, Minnesota 55046
RSSD 751656

**Federal Reserve Bank of Minneapolis
90 Hennepin Avenue, P.O. Box 291
Minneapolis, Minnesota 55480-0291**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Definitions for many of the terms used in the public evaluation can be found in section 228.12 of Regulation BB. For additional convenience, a Glossary of Common CRA Terms is attached as Appendix C at the end of this public evaluation.

The following abbreviations may be used throughout this performance evaluation:

| | |
|--|-------------|
| Air Force Base | AFB |
| American Community Survey | ACS |
| Arrowhead Economic Opportunity Agency, Inc. | AEOA |
| Assessment area | AA |
| Automated teller machine | ATM |
| Combined Statistical Area | CSA |
| Community Reinvestment Act | CRA |
| Dun & Bradstreet | D&B |
| Federal Agricultural Mortgage Corporation | Farmer Mac |
| Federal Deposit Insurance Corporation | FDIC |
| Federal Financial Institutions Examination Council | FFIEC |
| Federal Housing Administration | FHA |
| Federal Home Loan Bank | FHLB |
| Federal Home Loan Mortgage Corporation | Freddie Mac |
| Federal National Mortgage Association | Fannie Mae |
| U.S. Department of Agriculture Farm Service Agency | FSA |
| Home Mortgage Disclosure Act | HMDA |
| U.S. Department of Housing and Urban Development | HUD |
| Low- and moderate-income | LMI |
| Minnesota Housing Finance Agency | MHFA |
| Metropolitan Statistical Area | MSA |
| Mortgage-Backed Securities | MBS |
| Office of Management and Budget | OMB |
| Paycheck Protection Program | PPP |
| U.S. Department of Agriculture Rural Development | USDA RD |
| U.S. Small Business Administration | SBA |
| University of North Dakota | UND |
| Department of Veterans Affairs | VA |

INSTITUTION RATING

INSTITUTION'S CRA RATING: Frandsen Bank & Trust's rating is Outstanding.

Examiners evaluated the bank's CRA performance using the Large Bank CRA Examination Procedures. The following table shows the CRA performance of Frandsen Bank & Trust, Lonsdale, Minnesota, with respect to the Lending, Investment, and Service Tests.

| Frandsen Bank & Trust Performance Tests | | | |
|--|----------------------|------------------------|---------------------|
| <i>Performance Levels</i> | <i>Lending Test*</i> | <i>Investment Test</i> | <i>Service Test</i> |
| Outstanding | X | | |
| High Satisfactory | | X | X |
| Low Satisfactory | | | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |
| *Examiners assigned more weight to the Lending Test than to the Investment and Service Tests for determining the overall rating, in accordance with the Large Bank CRA Examination Procedures. | | | |

Major factors supporting the institution's rating include the following:

Lending Test

- Lending activity shows excellent responsiveness to credit needs throughout its AA.
- Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.
- Overall, the distribution of loans is good throughout the AAs, including LMI census tracts.
- The bank is a leader in making community development loans.
- The bank made a substantial majority of loans within its multistate MSA, Minnesota, and Wisconsin AAs.
- Overall, the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.

Investment Test

- The overall level of qualified investments in the form of securities and donations is significant.
- The bank's qualified investments exhibit good responsive to local credit and community development needs.

Service Test

- The bank provides a relatively high level of community development services.
- Retail banking services are accessible to the bank's geographies and individuals throughout the AAs. Services do not vary in a way that inconveniences LMI areas or individuals.
- Changes in the bank's network of branches, drive-up facilities, and ATMs did not adversely affect the accessibility of the bank's products and services.

INSTITUTION

DESCRIPTION OF INSTITUTION

General. Frandsen Bank & Trust is an interstate bank with headquarters in Lonsdale, Minnesota, with assets of \$3.2 billion as of December 31, 2022. The bank operates 39 offices in Minnesota, North Dakota, and Wisconsin. The bank continues to be effective in meeting the credit and community development needs of the residents, businesses, and farms throughout its AAs. No financial constraints or legal impediments prevent the bank from serving the credit needs of its AAs. The bank's CRA rating was Satisfactory at the previous evaluation dated December 7, 2020.

Structure. Frandsen Financial Corporation (FFC), Arden Hills, Minnesota, wholly owns Frandsen Bank & Trust. FFC also owns the following entities:

- Anderson Financial Group Capital Trust I, Wayzata, Minnesota
- Tower Statutory Trust I, Cloquet, Minnesota
- Frandsen Capital I, Forest Lake, Minnesota

The bank acquired three financial institutions by merger since the last evaluation: Peoples Bank Midwest, Hayward, Wisconsin, in 2020; Bank of Zumbrota, Zumbrota, Minnesota, in 2022; and Pine Island Bank, Pine Island, Minnesota, in 2022. The acquisitions established six new bank branches: one in Vadnais Heights, Minnesota; one each in Hayward and Eau Claire, Wisconsin; one in Pine Island; and two in Zumbrota.

Loan Portfolio. As of December 31, 2022, the bank's loan portfolio totaled \$2.1 billion. The portfolio consisted of 52.1% commercial, 25.5% residential real estate, 13.3% agriculture, 3.5% consumer closed-end, 3.1% consumer open-end, and 2.4% other loans. Total assets increased by 27.5% since December 31, 2020; growth has been organic and through acquisitions.

Credit Products. The bank offers closed- and open-end consumer residential real estate, commercial, and agricultural loan products to meet the needs of residents, businesses, and farms in its AAs. For a list of and information on innovative and flexible loan programs the bank participates in, refer to the Innovative and Flexible Lending Practices section of this report.

Offices. The bank operates branches and ATMs in Minnesota, North Dakota, and Wisconsin. In addition to the bank's main office in Lonsdale, Minnesota, the bank operated 38 branches as of December 31, 2022. As of that same date, the bank operated 33 branches in Minnesota, two in North Dakota, and three in Wisconsin. During the evaluation period, the number of branches changed as the bank merged with other institutions, opened or relocated branches, and closed branches. Refer to the Retail Banking Services discussion in the Service Test section for more details on the bank's retail delivery systems.

Assessment Areas. During the evaluation period, the bank had 14 AAs. As shown in the following table, the bank had 11 in Minnesota, two in Wisconsin, and one in a multistate MSA AA (in North Dakota and Minnesota). The bank did not add new AAs during the evaluation period. Additional details, including changes during the evaluation period for AAs, as well as the retail delivery network, are in the applicable AA sections of this evaluation.

| AA Information as of December 31, 2022 | | |
|---|---|--|
| AA Name | # of Offices by City | Geographical Description |
| State of Minnesota | | |
| New Ulm-Mankato CSA | Mankato, North Mankato, and New Ulm* | Blue Earth and Nicollet counties and a portion of Brown County |
| Minneapolis-St. Paul MSA | Apple Valley, Braham, Forest Lake, Jordan, Lakeville, Montgomery, Vadnais Heights, Waterville** | Anoka, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Ramsey, Scott, Sherburne, and Washington counties |
| Duluth MSA | Cloquet, Duluth, Ely, Hermantown, Tower, Virginia*** | St. Louis and Carlton counties and a portion of Lake County (all in Minnesota) and a portion of Douglas County (Wisconsin) |
| St. Cloud MSA | Foley | Benton County |
| Ada | Ada | Norman County |
| Baxter Lakes | Crosslake and Baxter | Crow Wing County and a portion of Cass County |
| Bird Island-Fairfax-Hector | Bird Island, Fairfax, Hector | Renville County and a portion of Sibley County |
| Clinton | Clinton | Big Stone County and a portion of Traverse County |
| Lonsdale-Goodhue | Dundas, Lonsdale, Pine Island, Zumbrota (2)**** | Rice and Goodhue counties and portions of Dodge, Olmsted, and Wabasha counties |
| Pine City | Pine City | Kanabec and Pine counties |
| Warren-Oslo | Oslo, Warren | A portion of Marshall County |
| State of Wisconsin | | |
| Luck-Hayward | Luck, Hayward | Burnett, Polk, Sawyer, Washburn counties and a portion of Bayfield County |
| Eau Claire MSA | Eau Claire | Eau Claire County |
| Multistate ND-MN MSA | | |
| Grand Forks Multistate MSA | Grand Forks, East Grand Forks | Grand Forks County (North Dakota) and a portion of Polk County (Minnesota) |
| <p>* From May through July 2021, the bank closed the North Mankato branch as well as the limited-service drive-up facility and the New Ulm South branch. The bank also relocated one North Mankato branch.</p> <p>** In October 2020, the bank merged with three acquired branches: one in Vadnais Heights, one in Hayward, and one in Eau Claire.</p> <p>*** In February 2022, the bank opened the Hermantown branch.</p> <p>**** In September 2022, the bank merged with one acquired branch in Pine Island and in October 2022, merged with two acquired branches in Zumbrota.</p> | | |

SCOPE OF EVALUATION

Examiners selected five of the bank's AAs for full-scope reviews. To select the full-scope reviews, examiners reviewed factors such as loan volume, deposit market share, branch size and location, length of time since the last full-scope review, and community development activity. For interstate banks, examiners must conduct a full-scope review of at least one AA from each state. A full-scope review requires examiners to evaluate the bank's quantitative and qualitative performance using the following criteria: lending activity, lending to borrowers of different income levels and to businesses and farms of

different sizes, geographic distribution of loans throughout the AA, community development lending, flexible and/or innovative lending practices, qualified investments, retail services, and community development services. The other AAs received limited-scope reviews in which examiners analyzed quantitative data about the bank's lending, investments, and services.

The AAs selected for full-scope reviews represent 66.1% of the bank's loans by number of loans and 72.4% by dollar amount of loans, according to loan data from January 1, 2020, to December 31, 2022. Examiners conducted full-scope reviews of the following AAs:

- Grand Forks, North Dakota-Minnesota, Multistate (Grand Forks Multistate) MSA AA
- Minneapolis-St. Paul-Bloomington, Minnesota-Wisconsin (Minneapolis-St. Paul) MSA AA
- Duluth, Minnesota (Duluth) MSA AA
- New Ulm-Mankato, Minnesota (New Ulm-Mankato) CSA AA
- Luck-Hayward, Wisconsin, non-metropolitan (Luck) AA

In determining the overall CRA rating, examiners placed the greatest weight on the bank's activities in its Minnesota AAs because the majority of the bank's lending occurs in these AAs. During the evaluation period, the bank extended 83.9% of its HMDA, small business, and small farm loans, by number, in the Minnesota AAs.¹ The comparative percentages for the Wisconsin AAs and the Grand Forks Multistate MSA AA were 6.2% and 9.9%, respectively. For Minnesota, examiners generally placed the most weight on the Minneapolis-St. Paul MSA and Duluth MSA AAs based on loan volume.

Because of the bank's size and its branches in MSAs, HMDA requires the bank to report home purchase, refinance, home improvement, and multifamily loan applications, and other purpose closed/exempt loans. The bank must report small business, small farm, and community development loans because of its asset size. To understand the bank's CRA performance, examiners evaluated the bank's reported 2020, 2021, and 2022 HMDA, small business, and small farm loans.² Examiners compared the bank's HMDA and CRA lending performance to that of aggregate lenders that reported loans originated or purchased in the AAs in 2020, 2021, and 2022. Examiners also evaluated the bank's 2020, 2021, and 2022 community development loans, qualified investments, and community development services and retail service activity.

Examiners also analyzed the demographic characteristics of each AA as one way to measure loan demand. For HMDA loans, examiners relied on demographic information, primarily from 2022 FFIEC adjusted census data, to understand the income levels and geographic locations of the families and housing units in the AAs.³ For small business and small farm loans, examiners used D&B data for the applicable year. D&B collects and publishes this self-reported data concerning the revenues and locations of local businesses and farms. The demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Instead, examiners reviewed the demographic data to provide a context for the bank's performance, along with the information obtained from bank management and community contacts.

As part of this evaluation, examiners had discussions with bank management and community contacts regarding local economic conditions, demographic characteristics, the performance of local financial

¹ Based on the total number of loans extended inside the bank's AAs during the three-year evaluation period.

² Examiners reviewed small farms in the full-scope AAs where small farm lending was a major product line. Examiners reviewed the major product lines in the limited-scope AAs, which varied, and noted those products in that section of the report.

³ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the OMB revised MSA delineations.

institutions, and opportunities to participate in community development activities. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition. Examiners considered these factors and the size and financial condition of the bank when evaluating its performance. The contacts did not identify any unmet credit needs in the bank's AAs.

The full-scope AA sections of this performance evaluation describe each AA's unique performance context. The bank's AAs have varying characteristics, which impact loan demand as well as community development opportunities. Some of the AAs include metropolitan areas, while some are predominantly rural. Generally, throughout the evaluation period, many of the bank's AAs had stable economies. The onset of the COVID-19 pandemic impacted AAs in various ways; the impact to the full-scope AAs is discussed in the relevant portions of this evaluation. Generally, the bank's small business and small farm lending was higher during 2020 and 2021 than 2022 due to the SBA's PPP loan program. The bank's loan volume for each product type generally decreased from 2020 through 2022; interest rates increased during that time. In the full-scope AAs, as well as many other AAs, the bank faces strong competition among various types of financial institutions and other creditors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's CRA rating is Outstanding based on the ratings for the Lending, Investment, and Service Tests. Overall, the bank did an excellent job of serving the credit and community development needs of its AAs in Minnesota and Wisconsin, as well as in the multistate MSA AA.

Examiners analyzed the following criteria to determine the Lending Test rating:

- Lending activity
- Lending to borrowers of different income levels and to businesses and farms of different sizes
- Geographic distribution of loans
- Lending inside the bank's AAs
- Community development lending
- Use of innovative and/or flexible lending practices.

To evaluate the bank's performance, examiners generally placed equal weight on the criteria of borrower distribution, geographic distribution, community development lending, and lending activity, followed by lending inside the bank's AAs. Further, examiners generally assigned less weight to the geographic distribution of loans if an AA did not include LMI census tracts. Finally, the bank's overall use of innovative and/or flexible lending practices contributed to the Lending Test rating.

Examiners evaluated the bank's qualified investments and its retail and community development services under the Investment and Service Tests, respectively.

LENDING TEST

The bank's Lending Test rating is Outstanding. Overall, the bank's lending to LMI borrowers and to small businesses and small farms is excellent. The overall geographic distribution and dispersion of loans is good. The bank is a leader in making community development loans, and it makes use of innovative and/or flexible lending practices. The bank's lending activity shows excellent responsiveness to credit needs throughout its AAs. Finally, the bank made a substantial majority of its loans inside its AAs. The bank is an interstate bank and operates in one multistate MSA, as well as other AAs. The regulation requires a separate analysis for each state in which the bank operates. This analysis must include at least one AA from each state. However, examiners evaluated the overall lending activity and the concentration

of lending inside the AAs at the institution level; both criteria are discussed below. For a detailed discussion of other Lending Test criteria, see the individual AA sections of this evaluation. For the limited-scope AAs, please see Appendix D for tables displaying the borrower and geographic distributions, as well as demographic and aggregate lender information.

Lending Activity

The bank's lending activity demonstrates excellent responsiveness to the credit needs of the AAs. The Summary of Lending Activity table shows the bank's HMDA-reportable and CRA-reportable lending activity from January 1, 2020, to December 31, 2022, by number and dollar amount.

| Summary of Lending Activity | | | | |
|-------------------------------------|---------------|---------------|------------------|---------------|
| Loan Type | # | % | \$(000s) | % |
| Home Purchase - Conventional | 2,031 | 36.0% | 472,693 | 39.2% |
| Home Purchase - FHA | 48 | 0.9% | 7,670 | 0.6% |
| Home Improvement | 282 | 5.0% | 25,854 | 2.1% |
| Multi-Family Housing | 59 | 1.0% | 47,101 | 3.9% |
| Other Purpose Closed-End | 210 | 3.7% | 25,835 | 2.1% |
| Refinancing | 3,010 | 53.4% | 625,887 | 51.9% |
| Total HMDA-related | 5,640 | 37.6% | 1,205,040 | 52.4% |
| Total Small Business-related | 6,228 | 41.5% | 772,973 | 33.6% |
| Total Small Farm-related | 3,123 | 20.8% | 321,296 | 14.0% |
| TOTAL LOANS | 14,991 | 100.0% | 2,299,309 | 100.0% |

Overall, the bank's primary business lines are HMDA, small business, and small farm lending. Loan volume and primary business lines vary by AA. Some markets are rural and small farm lending is a predominant loan type, while the bank is an active HMDA and small business lender in other areas. The bank is among leading lenders for HMDA- and CRA- reportable loans in several AAs, including in the Duluth MSA AA, New Ulm-Mankato CSA AA, and Grand Forks Multistate MSA AA. Overall, the bank's lending activities show excellent responsiveness to local credit needs in Minnesota, North Dakota, and Wisconsin. For detailed information regarding lending activity, see each full-scope AA sections.

Assessment Area Concentration

The bank extended a substantial majority of its loans inside its AAs. The table below shows the bank's concentrations of lending inside and outside the AAs from January 1, 2020, to December 31, 2022.

| Lending Inside and Outside the AAs | | | | | | | | |
|-------------------------------------|---------------|--------------|------------------|--------------|--------------|--------------|----------------|--------------|
| Loan Type | Inside | | | | Outside | | | |
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase - Conventional | 1,690 | 83.2% | 389,524 | 82.4% | 341 | 16.8% | 83,169 | 17.6% |
| Home Purchase - FHA | 41 | 85.4% | 6,308 | 82.2% | 7 | 14.6% | 1,362 | 17.8% |
| Home Improvement | 253 | 89.4% | 22,778 | 88.1% | 29 | 10.3% | 3,076 | 11.9% |
| Multi-Family Housing | 50 | 84.7% | 38,579 | 81.9% | 9 | 15.3% | 8,522 | 18.1% |
| Other Purpose Closed-End | 188 | 89.5% | 20,569 | 79.6% | 22 | 10.5% | 5,266 | 20.4% |
| Refinancing | 2,645 | 87.9% | 544,223 | 87.0% | 365 | 12.1% | 81,664 | 13.0% |
| Total HMDA-related | 4,867 | 86.3% | 1,021,981 | 84.8% | 773 | 13.7% | 183,059 | 15.2% |
| Total Small Business-related | 5,600 | 89.9% | 677,816 | 87.7% | 628 | 10.1% | 95,157 | 12.3% |
| Total Small Farm-related | 2,719 | 87.1% | 276,264 | 86.0% | 404 | 12.9% | 45,032 | 14.0% |
| TOTAL LOANS | 13,186 | 88.0% | 1,976,061 | 85.9% | 1,805 | 12.0% | 323,248 | 14.1% |

The bank extended 88.0% of all loans by number and 85.9% by dollar amount within its AAs. The bank's lending inside the AAs is generally consistent for HMDA, small business, and small farm loans.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among LMI borrowers and businesses and farms of different sizes is excellent. Geographically, the bank's performance in LMI census tracts is good. The bank's lending patterns do not reveal any unexplained gaps in any of the AAs.

Innovative and Flexible Lending Practices

The bank uses a variety of innovative and/or flexible lending programs. These programs help meet the credit needs of LMI individuals, small businesses, and small farms. The following list highlights a number of the programs the bank participated in during the evaluation period:

- *U.S. Department of Agriculture Rural Development:* USDA RD offers programs geared for purchasing, building, or repairing homes and refinancing mortgages in rural areas. The programs have income-eligibility requirements and offer flexible loan terms.
- *Home Possible:* This Freddie Mac program has flexible loan terms, such as low down payment options for first-time homebuyers and past homeowners. The program has some income limitations.
- *HomeReady:* This Fannie Mae program has flexibility in underwriting for qualified borrowers who meet specific income criteria or properties that meet geographic location criteria. It also has a low down payment requirement.
- *HomeStart:* This FHLB Des Moines grant program provides down payment and closing cost assistance to income-eligible first-time homebuyers.
- *Polk County Affordable Housing Loan Program:* Polk County in Minnesota offers closing cost and down payment assistance to qualified borrowers.
- *Marshall County Loan Pool:* Marshall County in Minnesota offers deferred interest-free loans and low-interest loans to help income-eligible qualified borrowers purchase or build a home.
- *Renville County Housing and Redevelopment Authority and Economic Development Authority:* Renville County in Minnesota offers down payment assistance and home rehabilitation loans to income-eligible, qualified borrowers.

- *Farm Service Agency and Farmer Mac:* FSA loans have flexible underwriting criteria and are often extended to farmers who cannot qualify for conventional loans. Farmer Mac provides flexible lending programs for rural farms and residents.
- *Small Business Administration:* SBA loans have flexible underwriting criteria for small businesses and are often extended to businesses that cannot qualify for conventional financing.
- *Paycheck Protection Program Lending:* PPP loans are SBA-backed loans that helped entities keep their workforce employed during the COVID-19 pandemic.⁴
- *Federal Housing Administration Loans:* FHA loans are designed for LMI borrowers. These loans typically require a lower down payment and credit score than conventional loans.
- *Veterans Affairs Home Loans:* VA home loans help eligible borrowers purchase a home at competitive rates, often without a down payment or mortgage insurance. Cash-out refinance loans allow eligible borrowers to cash out home equity to take care of paying off debt, education financing, or home improvements.
- *Minnesota Housing Finance Agency Fix-Up Loan Program:* The MHFA offers a program to make livability or energy efficiency improvements to homes; loan terms, rates, and fees are affordable for LMI borrowers.
- *City of New Ulm Homebuyer Assistance Loan Program:* Through its economic development authority, the City of New Ulm, Minnesota, offers zero interest, deferred payment loans to help eligible borrowers with down payment and closing cost requirements.
- *Arrowhead Economic Opportunity Agency, Inc.:* The AEOA administers programs that help facilitate homeownership with down payment and closing cost assistance to income-eligible, qualified borrowers.

During the evaluation period, the bank made loans and grants totaling over \$290.0 million through the innovative and flexible loan programs noted above. These loans and grants are included in the overall volume of loans evaluated under the Lending Test. For information on the use of these programs in the various states and full-scope AAs, refer to the applicable performance evaluation sections.

Community Development Lending

The bank is a leader in making community development loans. The bank originated 372 community development loans totaling \$342.5 million during the evaluation period that benefit its AAs or broader regional areas including its AAs. By number and dollar, the bank's community development lending was highest in the Minneapolis-St. Paul MSA AA, Duluth MSA AA, and Bird Island-Fairfax-Hector AA. The bank also had a high number and dollar volume of community development loans in several other AAs. The following table shows the bank's community development lending number and loan volume during the evaluation period by AA and broader regional areas including the bank's AAs.

⁴ Throughout this evaluation, PPP loan data has been aggregated by one or more counties for the relevant AA analysis. County-level information may include some PPP loans from outside of the bank's AAs if AAs are comprised of one or more partial counties.

| Community Development Loans by AA and Broader Regional Areas | | |
|---|------------|--------------------|
| AA | # | \$ |
| Grand Forks MSA | 27 | 27,483,871 |
| Minneapolis-St. Paul MSA | 101 | 133,920,485 |
| New Ulm-Mankato CSA | 31 | 13,818,083 |
| Duluth MSA | 86 | 77,978,408 |
| St. Cloud MSA | 11 | 4,320,268 |
| Ada, MN | 5 | 197,938 |
| Baxter Lakes MN | 2 | 154,275 |
| Bird Island-Fairfax-Hector MN | 42 | 44,937,454 |
| Clinton MN | 6 | 2,708,904 |
| Lonsdale-Goodhue MN | 15 | 3,947,691 |
| Pine City MN | 12 | 2,104,296 |
| Warren-Oslo MN | 3 | 160,679 |
| Luck-Hayward, WI | 24 | 14,325,384 |
| Eau Claire MSA | 6 | 13,437,736 |
| Regional (Wisconsin, Minnesota, Michigan) | 1 | 3,000,000 |
| Total | 372 | 342,495,472 |

Of the bank's community development loans noted in the table, 187 loans totaling \$52.5 million are PPP loans, most with community development purposes of economic development and revitalization or stabilization of qualified areas. These loans were impactful during the evaluation period as they supported entities during the pandemic. In addition to these PPP loans, the bank also made other community development loans that supported economic development (97 loans totaling \$179.6 in 10 AAs and a regional area) and revitalization or stabilization of qualified areas (53 loans totaling \$92.4 million in seven AAs), which helped retain and create jobs as well as support needs in LMI or distressed and/or underserved areas in the AAs. Lastly, the bank made other loans supporting community services to LMI individuals or families (14 loans totaling \$4.5 million in two AAs) and affordable housing (21 loans totaling \$13.5 million in eight AAs); these loans are responsive to the needs in the AAs.

Because the bank was responsive in meeting the credit and community development needs of its AAs, examiners also considered 32 community development loans totaling \$40.4 million that benefited areas in Minnesota, Wisconsin, and North Dakota outside of the bank's AAs. The loans supported economic development, revitalization or stabilization of qualified areas, and affordable housing. The table above does not include these loans.

INVESTMENT TEST

The Investment Test rating is high satisfactory because the level of qualified investments in the form of securities and donations is significant. During the evaluation period, qualified investments, including donations, benefiting the bank's AAs and broader statewide or multistate areas including the AAs totaled \$26.0 million.

Investments (non-donation). The following table shows the list of qualified investments, including new and prior period, by the bank's AAs and broader regional, statewide, or multistate areas that include the bank's AAs. The bank made 19 new investments totaling \$11.0 million during the evaluation period and continued to hold 36 prior-period investments totaling \$14.4 million. Overall, the level of investments shows good responsiveness to the credit needs and community development needs of the AAs. Of the

new non-donation investments, \$6.5 million supported affordable housing, an identified need, through the purchase of MBS pools. The bank also purchased 10 new investments totaling \$4.5 million that supported the construction and improvement of school facilities in qualified areas or with predominantly LMI students, as well as infrastructure and development in qualified areas.

| Qualified Investments by AA and Broader Regional, Statewide, or Multistate Areas | | |
|---|-------------------|-------------------------------|
| <i>AA</i> | <i>Securities</i> | |
| | <i>#</i> | <i>\$</i> |
| Grand Forks MSA | 2 | 889,999 |
| Minneapolis-St. Paul MSA | 12 | 6,163,739 |
| New Ulm-Mankato CSA | 1 | 139,479 |
| Duluth MSA | 5 | 2,599,519 |
| St. Cloud MSA | 1 | 611,877 |
| Ada, MN | 1 | 253,068 |
| Baxter Lakes MN | 5 | 1,748,208 |
| Bird Island-Fairfax-Hector MN | 3 | 766,944 |
| Clinton MN | 1 | 140,000 |
| Pine City MN | 1 | 256,780 |
| Warren-Oslo MN | 3 | 666,876 |
| Luck-Hayward, WI | 2 | 427,398 |
| Eau Claire MSA | 1 | 492,760 |
| Regional/Statewide MN | 10 | 3,490,276 |
| Regional/Statewide ND | 1 | 150,000 |
| Multistate MN-ND | 1 | 2,144,543 |
| Multistate MN-WI | 2 | 570,554 |
| Multistate National | 3 | 3,889,273 |
| Total | 55 | 25,401,293⁵ |

The bank made new or held prior-period non-donation investments in all AAs except Lonsdale-Goodhue. The bank's new non-donation investments benefited nine of its AAs, as well as regional or statewide areas in Minnesota and a multistate area (Minnesota and North Dakota). The bank's lack of new investments in some AAs is generally reasonable given competition for non-donation investment opportunities and varying investment opportunities in the AAs.

Because the bank was responsive in meeting the credit and community development needs of its AAs, examiners also considered 21 community development investments totaling \$5.6 million that benefited areas in Minnesota and Wisconsin outside of the bank's AAs. The investments supported revitalization or stabilization of qualified areas and community services to LMI individuals or families. Five of these investments totaling \$1.7 million are new investments purchased during the evaluation period. The table above does not include these investments.

Donations. The bank made a significant level of qualified investments in the form of donations that directly benefited the bank's AAs or broader regional, statewide, and multistate areas that include the bank's AAs. These donations totaled \$559,848, as shown in the table below.

⁵ This figure includes any investments/securities that matured, were sold, or paid during the evaluation period.

| Qualified Investment Donations Benefiting AAs and Broader Regional, Statewide, or Multistate Areas | | |
|--|------------|----------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 12 | 4,610 |
| Community Services | 404 | 297,010 |
| Economic Development | 32 | 38,898 |
| Revitalize or Stabilize | 197 | 219,330 |
| Total | 645 | 559,848 |

Donations primarily focused on community services to LMI individuals or families and revitalization or stabilization of qualified areas. The bank made several notable donations: a \$100,000 donation in the Duluth MSA AA that helped fund school facilities in a moderate-income area and donations totaling over \$40,000 to help fund law enforcement equipment in qualified moderate-income and distressed and underserved middle-income areas. Other donations were also impactful; for example, donations supported providing health care for LMI individuals, food to those in need, and education scholarships, as well as funded an assisted living facility in a rural underserved middle-income area. The charitable contributions show good responsiveness to community development needs. Additional details are presented in the analysis of each state and full-scope AA.

Because the bank was responsive in meeting the credit and community development needs of its AAs, examiners also considered community development investments totaling \$8,280 that benefited areas in Minnesota and Wisconsin outside of the bank's AAs. The donations supported revitalization or stabilization of qualified areas, community services to LMI individuals or families, and economic development. The table above does not include these donations.

SERVICE TEST

The bank's Service Test rating is high satisfactory based on performance in the full-scope AAs. Delivery systems are accessible to LMI individuals and geographies in the bank's AAs. Branch closures have not adversely affected the accessibility of the bank's delivery systems. Services do not vary in a way that inconveniences LMI areas or individuals throughout the AAs. The bank provides a relatively high level of community development services.

Retail Banking Services

Delivery systems are accessible throughout its AAs, and services do not vary in a way that inconveniences LMI areas or individuals. This conclusion primarily reflects the bank's performance in the bank's full-scope AAs. The bank provides retail services through its network of branches, drive-up facilities, and ATMs. Hours of operation are reasonable; they vary somewhat across the bank's various markets.

As of December 31, 2022, the bank operates 39 offices, as well as several ATMs, throughout Minnesota, Wisconsin, and North Dakota. The majority of the bank's branches are in Minnesota. As previously mentioned, the bank established six new branches (two in Wisconsin and four in Minnesota) during the evaluation period due to merger activity. The bank also opened a new branch in Minnesota. In addition, the bank relocated a branch (subsequently closing two offices in close proximity to the new location) and closed two other branches. The bank also made some additions and removals to its ATM network. The closures and relocation did not adversely affect accessibility of the bank's delivery system primarily given the proximity of other branches.

Of the bank's total offices, 2.6% are in low-income, 7.7% are in moderate-income, 69.2% are in middle-income, 17.9% are in upper-income, and 2.6% are in unknown-income census tracts. Tables illustrating the branches by tract location can be found in the state sections and the full-scope AA sections.

The bank provides alternative delivery systems that include telephone banking, online banking, and mobile banking. Additionally, the bank offers bill payment through its online and mobile banking platforms. The bank offers standardized products, well as loan programs mentioned in the Innovative and Flexible Practices section of this evaluation, and services throughout its AAs.

Refer to the AA Information table presented earlier in this section of the report, the Retail Banking Services in the state sections, or the relevant individual AA sections for additional information on branching structure changes.

Community Development Services

Overall, the bank provides a relatively high level of community development services throughout its AAs. This conclusion primarily reflects the bank's performance in the bank's full-scope AAs. Numerous bank employees provided financial expertise, such as serving as board members and on various committees, to organizations serving the bank's AA as well as broader regional, statewide, or multistate areas including the AAs. The bank's community development services mostly supported organizations that provide community services to LMI individuals or families, promote economic development, and revitalize or stabilize qualified areas. Bank employees provided community development services in all of the bank's AAs; the number of services varied by AA. Of the bank's AAs, the Minneapolis-St. Paul MSA AA, Duluth MSA AA, and New Ulm-Mankato MSA AA had the most services. Additional details are presented in the analysis of each state and full-scope AA.

| Community Development Services Benefiting AAs and Regional, Statewide or Multistate Areas | |
|--|------------|
| <i>Purpose</i> | <i>#</i> |
| Affordable Housing | 14 |
| Community Services | 59 |
| Economic Development | 49 |
| Revitalize or Stabilize | 41 |
| Total | 163 |

Because the bank was responsive in meeting the credit and community development needs of its AAs, examiners also considered five community development services that benefited areas in Minnesota and Wisconsin outside of the bank's AAs. The services supported revitalization or stabilization of qualified areas and economic development. The table above does not include these services.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act, Regulation C – Home Mortgage Disclosure Act, and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs. Neither the bank nor the Federal Reserve Bank of Minneapolis has received any CRA-related complaints.

MULTISTATE METROPOLITAN AREA FULL-SCOPE REVIEW

CRA RATING FOR Grand Forks, North Dakota-Minnesota, Multistate MSA Assessment Area⁶: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Grand Forks, North Dakota-Minnesota, Multistate MSA AA (Grand Forks Multistate MSA AA) shows excellent responsiveness to credit needs.
- The lending to farms and businesses of different sizes and to LMI borrowers is excellent.
- The distribution of loans throughout the AA is adequate.
- The bank is a leader in making community development loans.
- The bank makes extensive use of flexible loan programs.
- Overall, by number and dollar amount, the bank has a significant level of qualified investments, including donations, which exhibits good responsiveness to credit and community development needs.
- Bank retail services are accessible to geographies and residents throughout the AA. The bank also provides an adequate level of community development services.

SCOPE OF EVALUATION

The scope of the CRA evaluation for the Grand Forks Multistate MSA AA is consistent with the scope for the overall institution described previously in the Institution section. Examiners conducted a full-scope review of the Grand Forks Multistate MSA AA. For interstate institutions, a minimum of one AA from each multistate MSA must be reviewed using the full-scope examination procedures. To complete the full-scope review, examiners evaluated the following: lending activity, lending to borrowers of different income levels and to businesses and farms of different sizes, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GRAND FORKS MULTISTATE MSA ASSESSMENT AREA

Bank information. The bank operates two full-service branches in the Grand Forks Multistate MSA AA; one branch in Grand Forks, North Dakota, and the second in East Grand Forks, Minnesota. Both branches have a drive-up facility and an ATM. As of December 31, 2022, the branches represent 5.1% of the bank's offices. See the Service Test section for more details regarding the bank's retail services.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank has \$249.3 million in deposits in the Grand Forks, ND-MN MSA (Grand Forks MSA). The bank ranks fifth of 20 FDIC-insured financial institutions operating in the Grand Forks MSA, with 6.4% of the market's deposits. The bank's deposits in this AA represent 10.1% of its total deposits. The bank competes with various types of

⁶ The bank's performance in the Minnesota tracts of the Grand Forks Multistate MSA AA is reflected in this rating and the institution rating. The statewide evaluation of Minnesota does not reflect the bank's performance in those tracts.

financial institutions in this AA, including community, regional, and large national banks. The bank also competes with credit unions not represented in the FDIC deposit market share information.

Assessment Area Information. The bank's Grand Forks Multistate MSA AA consists of Grand Forks County in North Dakota and all but one tract of Polk County in Minnesota; these two counties make up the Grand Forks MSA. In 2020, the AA also included one census tract in Walsh County, North Dakota, which was distressed; the tract was removed from the bank's AA for 2021 and 2022. During the evaluation period, the number of census tracts in the AA and income classifications of some tracts also changed based on FFIEC adjusted census data. As of 2022, the AA consists of 31 census tracts: one low income, seven moderate income, 16 middle income, six upper income, and one unknown income. In 2021, the AA was comprised of one low-income tract, as well as four moderate-, 18 middle-, and four upper-income tracts. In 2020, the AA was comprised of one low-income tract, as well as four moderate-, 19 middle-, and four upper-income tracts.

The Grand Forks Multistate MSA AA is contiguous with the Warren-Oslo and Ada AAs. Within the Grand Forks Multistate MSA AA, the cities of Grand Forks and East Grand Forks are located on either side of the Red River, which separates the two states.

The Combined Demographics Report provides demographic information for the bank's AA based on the 2022 FFIEC adjusted census data and 2022 D&B data.

| Combined Demographics Report 2022 Grand Forks Multistate MSA AA | | | | | | | | |
|--|------------------------|------------------------|--------------------------|--------------|--|-------------|---------------------------|--------------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low-income | 1 | 3.2 | 186 | 0.8 | 108 | 58.1 | 4,951 | 22.1 |
| Moderate-income | 7 | 22.6 | 3,588 | 16.0 | 410 | 11.4 | 3,490 | 15.6 |
| Middle-income | 16 | 51.6 | 11,912 | 53.1 | 838 | 7.0 | 5,121 | 22.8 |
| Upper-income | 6 | 19.4 | 6,187 | 27.6 | 214 | 3.5 | 8,874 | 39.6 |
| Unknown-income | 1 | 3.2 | 563 | 2.5 | 104 | 18.5 | 0 | 0.0 |
| Total AA | 31 | 100.0 | 22,436 | 100.0 | 1,674 | 7.5 | 22,436 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 741 | 8 | 0.0 | 1.1 | 570 | 76.9 | 163 | 22.0 |
| Moderate-income | 9,154 | 2,689 | 11.8 | 29.4 | 5,849 | 63.9 | 616 | 6.7 |
| Middle-income | 25,422 | 12,927 | 56.6 | 50.8 | 9,113 | 35.8 | 3,382 | 13.3 |
| Upper-income | 9,778 | 6,661 | 29.1 | 68.1 | 2,763 | 28.3 | 354 | 3.6 |
| Unknown-income | 1,388 | 572 | 2.5 | 41.2 | 770 | 55.5 | 46 | 3.3 |
| Total AA | 46,483 | 22,857 | 100.0 | 49.2 | 19,065 | 41.0 | 4,561 | 9.8 |

| Combined Demographics Report 2022 Grand Forks Multistate MSA AA | | | | | | | | |
|--|---------------------------|-------|------------------------------------|-------|------------------|-------|----------------------|-------|
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low-income | 16 | 0.4 | 13 | 0.4 | 3 | 0.7 | 0 | 0.0 |
| Moderate-income | 808 | 19.4 | 723 | 19.7 | 76 | 18.4 | 9 | 11.3 |
| Middle-income | 2,289 | 55.0 | 2,013 | 54.9 | 217 | 52.4 | 59 | 73.8 |
| Upper-income | 962 | 23.1 | 841 | 22.9 | 110 | 26.6 | 11 | 13.8 |
| Unknown-income | 85 | 2.0 | 76 | 2.1 | 8 | 1.9 | 1 | 1.3 |
| Total AA | 4,160 | 100.0 | 3,666 | 100.0 | 414 | 100.0 | 80 | 100.0 |
| Percentage of Total Businesses: | | | | 88.1 | | 10.0 | | 1.9 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 11 | 2.3 | 10 | 2.2 | 1 | 6.7 | 0 | 0.0 |
| Middle-income | 402 | 85.4 | 392 | 86.0 | 10 | 66.7 | 0 | 0.0 |
| Upper-income | 58 | 12.3 | 54 | 11.8 | 4 | 26.7 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 471 | 100.0 | 456 | 100.0 | 15 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 96.8 | | 3.2 | | 0.0 |
| Source: 2022 FFIEC Census Data and 2022 D&B Information | | | | | | | | |

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Grand Forks MSA, for the year of loan origination.⁷ The table below shows the estimated median family income for each year and the ranges for low-, moderate-, middle-, and upper-income borrowers.

| Borrower Income Levels Grand Forks MSA | | | | | | |
|---|-----------------|--------------|---------------------|----------------------|---------------------|--|
| FFIEC Estimated Median Family Income | | Low | Moderate | Middle | Upper | |
| | | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above | |
| 2020 | \$89,200 | 0 - \$44,599 | \$44,600 - \$71,359 | \$71,360 - \$107,039 | \$107,040 - & above | |
| 2021 | \$80,000 | 0 - \$39,999 | \$40,000 - \$63,999 | \$64,000 - \$95,999 | \$96,000 - & above | |
| 2022 | \$92,800 | 0 - \$46,399 | \$46,400 - \$74,239 | \$74,240 - \$111,359 | \$111,360 - & above | |

⁷ The AA for 2020 includes one census tract in Walsh County, which is not part of the MSA. For borrowers in Walsh County, the evaluation uses the FFIEC's estimated median family income for nonmetropolitan areas of North Dakota, which was \$82,200 in 2020.

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for the Grand Forks MSA, which is \$70,827 for 2020 and 2021, and \$82,257 for 2022.⁸

Population. According to 2022 FFIEC adjusted census data, the total population of the AA is 100,856. Grand Forks County has the highest percentage (72.5%) of the AA population. A large percentage of residents in the AA are 25 to 64 years of age. The remaining age groups are as follows: 21.3% for residents 17 years and younger, 16.0% for residents aged 18 to 24 years, and 13.8% for residents 65 years and older.

Housing Information. According to 2022 FFIEC adjusted census data, the AA has 46,483 housing units: 49.2% are owner occupied, 41.0% are rental units, and 9.8% are vacant. The median age of the housing stock is 48 years, which is somewhat higher than the statewide median ages of 41 and 43 years for North Dakota and Minnesota, respectively. The median housing value is \$198,178, and the affordability ratio of 28.0 is lower or less affordable when compared to 32.7 for North Dakota and 31.1 for Minnesota. The affordability ratio is defined as the median household income divided by the median housing value; a lower ratio indicates less affordability.

The housing supply in the Grand Forks Multistate MSA AA is insufficient to meet community needs, according to community contacts and bank management. Many lower-priced homes were destroyed in the 1997 flood and have not been replaced. Homes that were rebuilt are priced too high for first-time homebuyers. Overall, home prices have increased in recent years, according to one contact. Homes that were priced around \$150,000 have increased to \$230,000 and are no longer affordable starter homes. As interest rates increased in 2022, affordability declined further. Buyers often compete with cash buyers in the market.

A notable percentage (41.0%) of the housing in the AA is rental units as shown in the Combined Demographics Report table. A contact said that rents had increased significantly since the beginning of the pandemic in 2020. People in the area are rent burdened, spending more than 30% (some as high as 50%) of their incomes on housing. People earning minimum wage cannot afford local housing options. While wages have increased, they are not at levels sufficient for some residents to afford area rents. The contact also stated that during the pandemic, North Dakota adopted a rent moratorium that led several local landlords to sell their properties. The change in ownership means many more properties are overseen by management companies that have stricter standards for renters and increased fees.

The following table shows the housing cost burden faced by renters and homeowners in the Grand Forks MSA, the counties in the MSA, and the states of Minnesota and North Dakota in 2022. The HUD defines cost-burdened families as follows: those who pay more than 30% of their income for housing and may have difficulty affording necessities such as food, clothing, transportation, and medical care. Overall, the housing cost burden for renters in the MSA is higher than the burden for those in statewide North Dakota and generally comparable to those in statewide Minnesota. The burden for renters in the MSA is significantly higher than the burden for homeowners. Homeowners generally fared better in the MSA, but low-income homeowners have significant housing cost burden.

⁸ For the Walsh County census tract, the evaluation uses the FFIEC adjusted census median family income for nonmetropolitan areas of North Dakota, which was \$74,708 in 2020.

| Housing Cost Burden | | | | | | |
|---|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area | Cost Burden - Renters | | | Cost Burden - Owners | | |
| | Low Income | Moderate Income | All Renters | Low Income | Moderate Income | All Owners |
| Grand Forks MSA | 72.7% | 20.6% | 41.3% | 57.9% | 22.7% | 15.0% |
| Polk County, MN | 64.7% | 5.0% | 39.6% | 60.8% | 17.4% | 16.2% |
| Grand Forks County, ND | 74.9% | 23.6% | 41.6% | 55.5% | 26.9% | 14.3% |
| Minnesota | 71.3% | 25.6% | 40.7% | 59.4% | 26.7% | 16.7% |
| North Dakota | 67.7% | 14.6% | 34.1% | 48.4% | 18.0% | 12.8% |
| <i>Cost Burden is housing cost that equals 30% or more of household income</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i> | | | | | | |

General Economic and Business Characteristics. The local economy is generally strong and stable, according to bank management and a community contact. The economy is diverse; major industries in the Grand Forks MSA include agriculture, manufacturing, healthcare, and education. According to a contact, the county's largest employers are as follows: UND, Grand Forks; Altru Health System, Grand Forks; Grand Forks Public Schools, Grand Forks; Valley Senior Living, Grand Forks; Walmart, Bentonville, Arkansas; and the Grand Forks AFB. Other notable local companies include LM Wind Power, Kolding, Denmark, which manufactures wind turbine blades; Cirrus Design Corporation, Duluth, Minnesota, which manufactures single person aircrafts; and North Spark Defense Laboratory, Grand Forks, which provides military-related security training. In addition to these and other global companies, a contact noted that Grand Forks has many small companies that provide local jobs. The city also has a healthy downtown area, which includes housing units, a hotel, and a grocery store, among other businesses. One of the key relationships for local private employers is with UND, which strives to offer educational programs that match the workforce needs of local businesses, according to a contact.

The local agricultural economy includes several agriculture-related companies, such as a sugar factory and a supply company, in addition to producers. Farmers have had strong profits over the past several years, and credit demand was lower, although some producers financed capital and equipment, according to bank management. Major crops include sugar beets, soybeans, canola, wheat, and corn.

A growing sector of the Grand Forks economy is the aeronautical industry. North Dakota continues to be a leader in unmanned and autonomous systems (UAS) development, and UND remains a key driver, according to a contact. The area is home to a Federal Aviation Administration designated test site for UAS.

As shown in the following table, the unemployment rates in the Grand Forks MSA as well as the counties and states in the AA were higher during 2020 and 2021 but then returned to lower levels. The unemployment rates in Polk County are higher than in Grand Forks County. The county rates are generally consistent with the related state for all three years of the evaluation period.

| Average Annual Unemployment Rates | | | |
|---|------|------|------|
| Area | 2020 | 2021 | 2022 |
| Grand Forks MSA | 4.9% | 3.1% | 2.2% |
| Polk County, MN | 5.7% | 4.2% | 3.0% |
| Grand Forks County, ND | 4.5% | 2.7% | 1.9% |
| Minnesota | 6.3% | 3.8% | 2.7% |
| North Dakota | 5.0% | 3.1% | 2.1% |
| <i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i> | | | |

The employment market in Grand Forks is typically tight, and the housing stock limits the area's ability to attract new residents, according to a contact. The tight labor market was less of an issue during the early years of the pandemic, but bank management said that wages increased during the evaluation period and employers had a hard time finding staff.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GRAND FORKS MULTISTATE MSA ASSESSMENT AREA

The overall CRA rating for the Grand Forks Multistate MSA AA is satisfactory based on the bank's performance under the Lending, Investment, and Service tests.

The Lending Test rating is outstanding. Lending levels show excellent responsiveness to AA credit needs. The distribution of lending to borrowers of different income levels and businesses and farms of different sizes is excellent. The bank's lending in geographies of different income levels is adequate. The bank is a leader in making community development loans and makes extensive use of flexible loan programs to help meet credit needs. By product, examiners assigned the most weight to small business loans, followed by HMDA loans. Small farm loans received the least weight; weighting decisions are based on loan number volume during the evaluation period.

The Investment Test rating is high satisfactory. Overall, the bank made a significant level of investments, including donations, that demonstrates good responsiveness to credit and community development needs.

The Service Test rating is low satisfactory. Retail services are accessible to all areas of the AA and do not vary in a way that inconveniences certain individuals or areas. Additionally, the bank provides an adequate level of community development services.

LENDING TEST

The Lending Test rating is outstanding for the Grand Forks Multistate MSA AA.

Lending Activity

The bank's lending levels reflect excellent responsiveness to credit needs in its Grand Forks Multistate MSA AA. The table below shows the bank's lending in the AA by product type for the three-year evaluation period.

| Summary of Lending Activity in the Grand Forks Multistate MSA AA | | | | |
|---|--------------|--------------|----------------|--------------|
| Loan Type | 2020-2022 | | | |
| | # | % | \$(000) | % |
| HMDA-reportable | 437 | 33.5 | 76,383 | 45.9 |
| Small Business-reportable | 530 | 40.6 | 47,571 | 28.6 |
| Small Farm-reportable | 338 | 25.9 | 42,433 | 25.5 |
| Total Loans | 1,305 | 100.0 | 166,387 | 100.0 |

The bank's market share for HMDA was similar in 2021 and 2022: 3.8% and 3.6%, respectively. In 2021, the bank ranked eighth out of 166 lenders reporting HMDA data and in 2022, the bank ranked fifth out of 126 lenders reporting HMDA data. In 2021, the bank ranked second out of 60 lenders reporting CRA data, with a 10.7% market share. In 2022, the bank ranked fifth out of 53 lenders reporting CRA data, with a 6.4% market share. During the evaluation period, lending activity in this AA represented 9.9% by number and 8.4% by dollar amount of the bank's total lending.

Distribution by Borrower Income Level and by Size of Businesses and Farms

The bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is excellent. The following tables show the bank's HMDA loan data by income level and product type for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Grand Forks Multistate MSA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 5 | 11.1 | 7.3 | 662 | 6.9 | 4.5 | 19.9 |
| Moderate | 11 | 24.4 | 24.0 | 1,832 | 19.1 | 18.4 | 18.8 |
| Middle | 12 | 26.7 | 21.7 | 2,147 | 22.4 | 21.4 | 21.0 |
| Upper | 16 | 35.6 | 27.2 | 4,619 | 48.1 | 37.5 | 40.3 |
| Unknown | 1 | 2.2 | 19.8 | 346 | 3.6 | 18.2 | 0.0 |
| Total | 45 | 100.0 | 100.0 | 9,606 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 6 | 6.1 | 4.4 | 675 | 3.8 | 2.4 | 19.9 |
| Moderate | 18 | 18.2 | 16.6 | 2,787 | 15.9 | 12.1 | 18.8 |
| Middle | 27 | 27.3 | 21.1 | 3,963 | 22.6 | 18.5 | 21.0 |
| Upper | 39 | 39.4 | 33.3 | 8,516 | 48.6 | 40.4 | 40.3 |
| Unknown | 9 | 9.1 | 24.6 | 1,598 | 9.1 | 26.6 | 0.0 |
| Total | 99 | 100.0 | 100.0 | 17,539 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 1 | 20.0 | 4.1 | 14 | 4.7 | 1.4 | 19.9 |
| Moderate | 1 | 20.0 | 13.1 | 15 | 5.0 | 9.1 | 18.8 |
| Middle | 2 | 40.0 | 18.9 | 220 | 73.6 | 17.2 | 21.0 |
| Upper | 1 | 20.0 | 50.8 | 50 | 16.7 | 52.0 | 40.3 |
| Unknown | 0 | 0.0 | 13.1 | 0 | 0.0 | 20.3 | 0.0 |
| Total | 5 | 100.0 | 100.0 | 299 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 14 | 9.1 | 5.6 | 1,469 | 5.3 | 3.4 | 19.9 |
| Moderate | 30 | 19.5 | 19.6 | 4,634 | 16.6 | 15.0 | 18.8 |
| Middle | 43 | 27.9 | 21.2 | 6,593 | 23.7 | 19.9 | 21.0 |
| Upper | 57 | 37.0 | 31.6 | 13,220 | 47.5 | 39.4 | 40.3 |
| Unknown | 10 | 6.5 | 22.0 | 1,944 | 7.0 | 22.4 | 0.0 |
| Total | 154 | 100.0 | 100.0 | 27,860 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 3.8 | 0 | 0.0 | 5.6 | 19.9 |
| Moderate | 0 | 0.0 | 16.5 | 0 | 0.0 | 12.0 | 18.8 |
| Middle | 0 | 0.0 | 24.1 | 0 | 0.0 | 27.2 | 21.0 |
| Upper | 0 | 0.0 | 51.9 | 0 | 0.0 | 53.4 | 40.3 |
| Unknown | 0 | 0.0 | 3.8 | 0 | 0.0 | 1.7 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 2 | 40.0 | 4.2 | 118 | 28.4 | 2.0 | 19.9 |
| Moderate | 0 | 0.0 | 16.7 | 0 | 0.0 | 8.7 | 18.8 |
| Middle | 2 | 40.0 | 25.0 | 263 | 63.2 | 16.4 | 21.0 |
| Upper | 1 | 20.0 | 52.1 | 35 | 8.4 | 66.6 | 40.3 |
| Unknown | 0 | 0.0 | 2.1 | 0 | 0.0 | 6.3 | 0.0 |
| Total | 5 | 100.0 | 100.0 | 416 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 19.9 |
| Moderate | 0 | 0.0 | 4.0 | 0 | 0.0 | 6.4 | 18.8 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 21.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 40.3 |
| Unknown | 0 | 0.0 | 96.0 | 0 | 0.0 | 93.6 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Grand Forks Multistate MSA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 8 | 23.5 | 10.5 | 735 | 12.5 | 6.2 | 22.1 |
| Moderate | 8 | 23.5 | 23.3 | 1,318 | 22.4 | 18.5 | 15.6 |
| Middle | 11 | 32.4 | 22.1 | 2,328 | 39.5 | 23.1 | 22.8 |
| Upper | 6 | 17.6 | 25.7 | 1,419 | 24.1 | 36.6 | 39.6 |
| Unknown | 1 | 2.9 | 18.4 | 90 | 1.5 | 15.7 | 0.0 |
| Total | 34 | 100.0 | 100.0 | 5,890 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 8.1 | 0 | 0.0 | 4.6 | 22.1 |
| Moderate | 7 | 30.4 | 23.0 | 756 | 18.6 | 19.6 | 15.6 |
| Middle | 6 | 26.1 | 20.0 | 1,182 | 29.0 | 20.5 | 22.8 |
| Upper | 10 | 43.5 | 34.5 | 2,132 | 52.4 | 40.6 | 39.6 |
| Unknown | 0 | 0.0 | 14.5 | 0 | 0.0 | 14.7 | 0.0 |
| Total | 23 | 100.0 | 100.0 | 4,070 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 3.3 | 0 | 0.0 | 1.9 | 22.1 |
| Moderate | 5 | 29.4 | 17.8 | 159 | 25.3 | 13.0 | 15.6 |
| Middle | 6 | 35.3 | 23.0 | 215 | 34.2 | 21.4 | 22.8 |
| Upper | 4 | 23.5 | 46.7 | 145 | 23.1 | 52.7 | 39.6 |
| Unknown | 2 | 11.8 | 9.2 | 110 | 17.5 | 11.0 | 0.0 |
| Total | 17 | 100.0 | 100.0 | 629 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 8 | 10.0 | 9.3 | 735 | 6.6 | 5.7 | 22.1 |
| Moderate | 20 | 25.0 | 21.8 | 2,233 | 20.1 | 18.3 | 15.6 |
| Middle | 24 | 30.0 | 21.5 | 3,825 | 34.4 | 22.5 | 22.8 |
| Upper | 25 | 31.3 | 30.9 | 4,133 | 37.1 | 38.3 | 39.6 |
| Unknown | 3 | 3.8 | 16.5 | 200 | 1.8 | 15.3 | 0.0 |
| Total | 80 | 100.0 | 100.0 | 11,126 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |
| Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Grand Forks Multistate MSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 9.2 | 0 | 0.0 | 7.5 | 22.1 |
| Moderate | 0 | 0.0 | 11.2 | 0 | 0.0 | 5.9 | 15.6 |
| Middle | 0 | 0.0 | 24.5 | 0 | 0.0 | 23.9 | 22.8 |
| Upper | 0 | 0.0 | 53.1 | 0 | 0.0 | 60.4 | 39.6 |
| Unknown | 0 | 0.0 | 2.0 | 0 | 0.0 | 2.4 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 5.8 | 0 | 0.0 | 2.0 | 22.1 |
| Moderate | 0 | 0.0 | 9.6 | 0 | 0.0 | 12.4 | 15.6 |
| Middle | 1 | 16.7 | 19.2 | 100 | 18.6 | 21.7 | 22.8 |
| Upper | 5 | 83.3 | 63.5 | 437 | 81.4 | 62.8 | 39.6 |
| Unknown | 0 | 0.0 | 1.9 | 0 | 0.0 | 1.1 | 0.0 |
| Total | 6 | 100.0 | 100.0 | 537 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.1 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 15.6 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.8 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 39.6 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's HMDA lending to low-income borrowers is below demographics. The bank's HMDA lending to low-income borrowers slightly exceeds aggregate lenders' performance in 2021 and is comparable to aggregate lenders' performance in 2022. Based on FFIEC adjusted census data, 19.9% and 22.1% of families in the AA are low income in 2021 and 2022, respectively. In 2021, the bank's HMDA lending to moderate-income borrowers is comparable to demographics and aggregate lenders' performance. In 2022, the bank's lending to moderate-income borrowers exceeds demographics and slightly exceeds aggregate lenders' performance. Based on FFIEC adjusted census data, 18.8% and 15.6% of families in the AA are moderate income in 2021 and 2022, respectively. Given affordability issues in the AA, the bank's home purchase lending to low-income borrowers is noteworthy; the bank's performance exceeded aggregate lenders' performance. The bank ranked eighth in 2021 and fifth in 2022 among HMDA reporters in the Grand Forks Multistate MSA AA. The bank operates in a competitive

market in this AA and competes with various types of institutions for the loans in the AA, including mortgage companies, regional banks, and large national banks.

Community contacts noted affordable housing is insufficient to meet local needs. Little housing stock is available for less than \$350,000, which is unaffordable for LMI residents, according to a contact. A contact and management noted that the housing market is still impacted by the destruction of lower-priced homes during the 1997 flood. Given limited inventory and prices in the market, it is likely challenging for LMI individuals to purchase a home in the AA.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2022 FFIEC estimated median family income of \$92,800 for the Grand Forks MSA, an individual with the highest income in the low-income bracket (\$46,399) can afford a \$139,197 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket (\$74,239) can afford a \$222,717 home. According to 2022 FFIEC adjusted census data, the median housing value in the AA is \$198,178. This data suggests that homeownership would not be affordable for many low-income borrowers, as well as some moderate-income borrowers.

In this AA, the bank made extensive use of flexible lending programs to assist meeting the credit needs of LMI borrowers. The bank participated in the Fannie Mae HomeReady program, Polk County affordable housing grant program, USDA RD loan program, and the FHLB's HomeStart grant program, which help LMI borrowers achieve homeownership. The HomeStart program funds can also be used for property rehabilitation. The bank also used FHA and VA loan programs in the AA. During the evaluation period, the bank's use of these programs resulted in approximately \$2.9 million in loans and \$47,500 in grants. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2020 HMDA lending performance was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following tables show the small business loan data by revenue and loan size for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 154 | 75.5 | 54.6 | 8,024 | 50.2 | 39.8 | 88.3 |
| Over \$1 Million | 43 | 21.1 | | 7,526 | 47.1 | | 9.9 |
| Revenue Unknown | 7 | 3.4 | | 423 | 2.6 | | 1.8 |
| Total | 204 | 100.0 | | 15,973 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 170 | 83.3 | 82.4 | 5,107 | 32.0 | 21.5 | |
| \$100,001 - \$250,000 | 18 | 8.8 | 8.7 | 3,257 | 20.4 | 19.5 | |
| \$250,001 - \$1 Million | 16 | 7.8 | 8.9 | 7,609 | 47.6 | 59.1 | |
| Total | 204 | 100.0 | 100.0 | 15,973 | 100.0 | 100.0 | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|-----|-------|--|-------|-------|--|--|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 140 | 90.9 | | 3,655 | 45.6 | | |
| \$100,001 - \$250,000 | 8 | 5.2 | | 1,403 | 17.5 | | |
| \$250,001 - \$1 Million | 6 | 3.9 | | 2,966 | 37.0 | | |
| Total | 154 | 100.0 | | 8,024 | 100.0 | | |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2021 Dun & Bradstreet Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 63 | 64.9 | 49.9 | 6,773 | 56.0 | 36.4 | 88.1 |
| Over \$1 Million | 33 | 34.0 | | 5,311 | 43.9 | | 10.0 |
| Revenue Unknown | 1 | 1.0 | | 2 | 0.0 | | 1.9 |
| Total | 97 | 100.0 | | 12,086 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 62 | 63.9 | 82.6 | 2,912 | 24.1 | 19.6 | |
| \$100,001 - \$250,000 | 23 | 23.7 | 8.5 | 4,316 | 35.7 | 19.2 | |
| \$250,001 - \$1 Million | 12 | 12.4 | 8.8 | 4,858 | 40.2 | 61.2 | |
| Total | 97 | 100.0 | 100.0 | 12,086 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 44 | 69.8 | | 2,036 | 30.1 | | |
| \$100,001 - \$250,000 | 13 | 20.6 | | 2,281 | 33.7 | | |
| \$250,001 - \$1 Million | 6 | 9.5 | | 2,456 | 36.3 | | |
| Total | 63 | 100.0 | | 6,773 | 100.0 | | |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2022 Dun & Bradstreet Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's lending to small businesses exceeded aggregate lenders' activity in 2021 and 2022. According to 2021 and 2022 D&B data, 88.3% and 88.1% of businesses had gross annual revenues of \$1 million or less, respectively. For both years, the bank's and aggregate lenders' lending activities were below demographic data; the bank compared more favorably to demographics than aggregate lenders. In 2021, the bank's lending was comparable to aggregate lenders for extending small business loans in amounts of \$100,000 or less. In 2022, the bank's lending was below aggregate lenders for extending small business loans in amounts of \$100,000 or less, but the bank still made most of its loans in those smaller amounts. In 2021 and 2022, the bank made 90.9% and 69.8%, respectively, of its small business loans to small entities for \$100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. In this AA, the bank competes with a variety of creditors for small business loans, including large regional and national banks; several of the banks are large credit card

issuers. Among strong competition, the bank ranked second in 2021 and fifth in 2022 for total CRA-reportable loans in the AA.

In 2020 and 2021, the bank made extensive use of the PPP loan program; these loans were designed to help businesses keep their workforces employed during the pandemic. The bank originated over 250 business-related PPP loans in amounts of \$1 million or less, totaling over \$13.5 million in this AA.⁹ Of those PPP loans, more than half were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and contributes to the bank's performance.

The bank also made use of other SBA programs. During the evaluation period, the bank originated approximately \$6.7 million in loans through those programs.

The bank's 2020 small business lending performance was generally consistent with the bank's 2021 and 2022 small business lending performance.

Small Farm. The bank's lending to small farms of different sizes is excellent. The following tables show the bank's small farm lending by revenue and loan size for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 118 | 77.6 | 65.6 | 8,926 | 61.0 | 61.2 | 97.4 |
| Over \$1 Million | 33 | 21.7 | | 5,555 | 38.0 | | 2.6 |
| Revenue Unknown | 1 | 0.7 | | 156 | 1.1 | | 0.0 |
| Total | 152 | 100.0 | | 14,637 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 110 | 72.4 | 68.2 | 3,191 | 21.8 | 17.1 | |
| \$100,001 - \$250,000 | 21 | 13.8 | 17.2 | 3,826 | 26.1 | 29.8 | |
| \$250,001 - \$500,000 | 21 | 13.8 | 14.7 | 7,620 | 52.1 | 53.1 | |
| Total | 152 | 100.0 | 100.0 | 14,637 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 94 | 79.7 | | 2,693 | 30.2 | | |
| \$100,001 - \$250,000 | 11 | 9.3 | | 1,878 | 21.0 | | |
| \$250,001 - \$500,000 | 13 | 11.0 | | 4,355 | 48.8 | | |
| Total | 118 | 100.0 | | 8,926 | 100.0 | | |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2021 Dun & Bradstreet Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

⁹ This PPP data excludes loans with a North American Classification System code indicating the business is in the agricultural sector; the excluded loans are discussed in the small farm loan borrower distribution section.

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 52 | 69.3 | 50.2 | 8,831 | 61.1 | 57.3 | 96.8 |
| Over \$1 Million | 21 | 28.0 | | 5,545 | 38.4 | | 3.2 |
| Revenue Unknown | 2 | 2.7 | | 76 | 0.5 | | 0.0 |
| Total | 75 | 100.0 | | 14,452 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 31 | 41.3 | 61.4 | 1,871 | 12.9 | 14.7 | |
| \$100,001 - \$250,000 | 21 | 28.0 | 19.8 | 3,870 | 26.8 | 28.1 | |
| \$250,001 - \$500,000 | 23 | 30.7 | 18.8 | 8,711 | 60.3 | 57.2 | |
| Total | 75 | 100.0 | 100.0 | 14,452 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 25 | 48.1 | | 1,496 | 16.9 | | |
| \$100,001 - \$250,000 | 14 | 26.9 | | 2,400 | 27.2 | | |
| \$250,001 - \$500,000 | 13 | 25.0 | | 4,935 | 55.9 | | |
| Total | 52 | 100.0 | | 8,831 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's lending to small farms exceeded aggregate lenders' activity. According to 2021 and 2022 D&B data, 97.4% and 96.8%, respectively, of farms had gross annual revenues of \$1 million or less. For both years, the bank's lending activity was below demographic data; the bank compared more favorably to demographics than aggregate lenders. Bank management noted that local farms are consolidating, decreasing the opportunity to lend to smaller farms. The bank slightly exceeded aggregate lenders when extending small farm loans for amounts of \$100,000 or less in 2021 and was below in 2022. In 2021 and 2022, the bank made 79.7% and 48.1%, respectively, of its small farm loans to small entities for amounts of \$100,000 or less. This indicates a willingness to meet the credit needs of small farms that tend to request small-dollar loans. The bank competes with several creditors for small farm loans, including regional and large national banks, as well as an agricultural-related finance company. As mentioned previously, the bank ranked in the top five lenders for 2021 and 2022 for CRA-reportable loans. In this AA, the bank's small farm lending represented 16.6% and 12.4% of aggregate lenders' activity in 2021 and 2022, respectively.

In 2020 and 2021, the bank made extensive use of the PPP loan program. The bank originated over 110 agriculture-related PPP loans in amounts of \$1 million or less, totaling over \$2.4 million in this AA.¹⁰

¹⁰ This PPP data only includes loans with a North American Classification System code indicating the business is in the agricultural sector; the excluded loans are discussed in the small business loan borrower distribution section.

Of those PPP loans, nearly all were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small farms. The bank's PPP lending is highly responsive to small farm credit needs and contributes to the bank's performance.

In addition to PPP loans, the bank also made use of FSA and Farmer Mac loan programs. During the evaluation period, the bank originated approximately \$6.6 million in loans through those programs.

The bank's 2020 small farm lending performance was generally consistent with the bank's 2021 and 2022 small farm lending performance.

Geographic Distribution

The geographic distribution and dispersion of the bank's HMDA, small business, and small farm loans in the Grand Forks Multistate MSA AA is adequate and does not reveal any unexplained gaps in lending. As previously mentioned, the income classification of some census tracts, as well as the number of tracts in the AA, changed during the evaluation period. As of 2022, the AA consists of the following tracts: one low income, seven moderate income, 16 middle income, six upper income, and one unknown income. In 2021, the AA was comprised of one low-income tract, as well as four moderate-, 18 middle-, and four upper-income tracts. In 2020, the AA was comprised of one low-income tract, as well as four moderate-, 19 middle-, and four upper-income tracts.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is adequate. The following tables below show the distribution of the bank's 2021 and 2022 HMDA loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | №% | №% | \$(000) | №% | №% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.4 | 0 | 0.0 | 0.4 | 0.3 |
| Moderate | 5 | 11.1 | 11.2 | 620 | 6.5 | 8.8 | 10.7 |
| Middle | 25 | 55.6 | 59.3 | 5,372 | 55.9 | 53.0 | 65.1 |
| Upper | 15 | 33.3 | 29.1 | 3,614 | 37.6 | 37.9 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 45 | 100.0 | 100.0 | 9,606 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.1 | 0.3 |
| Moderate | 2 | 2.0 | 8.1 | 253 | 1.4 | 6.2 | 10.7 |
| Middle | 61 | 61.6 | 56.8 | 9,613 | 54.8 | 51.3 | 65.1 |
| Upper | 36 | 36.4 | 34.9 | 7,673 | 43.7 | 42.4 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 99 | 100.0 | 100.0 | 17,539 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Moderate | 0 | 0.0 | 9.0 | 0 | 0.0 | 9.8 | 10.7 |
| Middle | 2 | 40.0 | 68.0 | 64 | 21.4 | 63.9 | 65.1 |
| Upper | 3 | 60.0 | 23.0 | 235 | 78.6 | 26.3 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 299 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 2.6 | 0 | 0.0 | 0.7 | 7.4 |
| Moderate | 1 | 100.0 | 23.7 | 1,210 | 100.0 | 18.7 | 29.8 |
| Middle | 0 | 0.0 | 63.2 | 0 | 0.0 | 58.1 | 53.1 |
| Upper | 0 | 0.0 | 10.5 | 0 | 0.0 | 22.6 | 9.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 1,210 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.3 | 0.3 |
| Moderate | 8 | 5.2 | 9.6 | 2,083 | 7.2 | 8.0 | 10.7 |
| Middle | 92 | 59.4 | 58.6 | 15,315 | 52.7 | 52.7 | 65.1 |
| Upper | 55 | 35.5 | 31.6 | 11,672 | 40.2 | 39.0 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 155 | 100.0 | 100.0 | 29,070 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Moderate | 0 | 0.0 | 6.3 | 0 | 0.0 | 5.3 | 10.7 |
| Middle | 0 | 0.0 | 63.3 | 0 | 0.0 | 53.9 | 65.1 |
| Upper | 0 | 0.0 | 30.4 | 0 | 0.0 | 40.8 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Moderate | 0 | 0.0 | 4.2 | 0 | 0.0 | 3.5 | 10.7 |
| Middle | 4 | 80.0 | 58.3 | 266 | 63.9 | 59.1 | 65.1 |
| Upper | 1 | 20.0 | 37.5 | 150 | 36.1 | 37.4 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 416 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Moderate | 0 | 0.0 | 12.0 | 0 | 0.0 | 12.9 | 10.7 |
| Middle | 0 | 0.0 | 80.0 | 0 | 0.0 | 74.4 | 65.1 |
| Upper | 0 | 0.0 | 8.0 | 0 | 0.0 | 12.7 | 23.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|------|------|---------|------|------|------------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 6 | 17.6 | 13.6 | 1,295 | 22.0 | 11.2 | 11.8 |
| Middle | 14 | 41.2 | 48.1 | 2,441 | 41.4 | 41.3 | 56.6 |
| Upper | 14 | 41.2 | 35.3 | 2,154 | 36.6 | 46.0 | 29.1 |
| Unknown | 0 | 0.0 | 3.0 | 0 | 0.0 | 1.5 | 2.5 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 34 | 100.0 | 100.0 | 5,890 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 4.3 | 10.9 | 95 | 2.3 | 9.4 | 11.8 |
| Middle | 12 | 52.2 | 50.6 | 1,780 | 43.7 | 45.9 | 56.6 |
| Upper | 10 | 43.5 | 38.3 | 2,195 | 53.9 | 44.5 | 29.1 |
| Unknown | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.2 | 2.5 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 23 | 100.0 | 100.0 | 4,070 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 5.9 | 12.5 | 50 | 7.9 | 13.4 | 11.8 |
| Middle | 8 | 47.1 | 45.4 | 289 | 45.9 | 37.7 | 56.6 |
| Upper | 8 | 47.1 | 42.1 | 290 | 46.1 | 48.9 | 29.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 2.5 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 17 | 100.0 | 100.0 | 629 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 4.5 |
| Moderate | 0 | 0.0 | 61.5 | 0 | 0.0 | 66.3 | 31.4 |
| Middle | 0 | 0.0 | 35.9 | 0 | 0.0 | 33.4 | 45.2 |
| Upper | 0 | 0.0 | 2.6 | 0 | 0.0 | 0.3 | 14.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 4.6 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 8 | 10.0 | 13.3 | 1,440 | 12.9 | 22.6 | 11.8 |
| Middle | 36 | 45.0 | 48.0 | 4,696 | 42.2 | 40.3 | 56.6 |
| Upper | 36 | 45.0 | 36.5 | 4,990 | 44.8 | 36.1 | 29.1 |
| Unknown | 0 | 0.0 | 2.3 | 0 | 0.0 | 1.0 | 2.5 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 80 | 100.0 | 100.0 | 11,126 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 6.1 | 0 | 0.0 | 3.1 | 11.8 |
| Middle | 0 | 0.0 | 49.0 | 0 | 0.0 | 42.6 | 56.6 |
| Upper | 0 | 0.0 | 43.9 | 0 | 0.0 | 51.5 | 29.1 |
| Unknown | 0 | 0.0 | 1.0 | 0 | 0.0 | 2.8 | 2.5 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 11.5 | 0 | 0.0 | 3.7 | 11.8 |
| Middle | 2 | 33.3 | 32.7 | 186 | 34.6 | 39.1 | 56.6 |
| Upper | 4 | 66.7 | 55.8 | 351 | 65.4 | 57.2 | 29.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 2.5 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 6 | 100.0 | 100.0 | 537 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 5.3 | 0 | 0.0 | 13.4 | 11.8 |
| Middle | 0 | 0.0 | 52.6 | 0 | 0.0 | 53.8 | 56.6 |
| Upper | 0 | 0.0 | 10.5 | 0 | 0.0 | 24.7 | 29.1 |
| Unknown | 0 | 0.0 | 31.6 | 0 | 0.0 | 8.1 | 2.5 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank did not make loans in the low-income tract; however, aggregate lenders only made 0.3% of loans in the low-income tract in 2021 and did not make any loans in the tract in 2022. The tract is comprised of 79.9% and 76.9% rental housing in 2021 and 2022, respectively, and 14.2% and 22.0% vacant housing units in 2021 and 2022, respectively, which explains the lending data. The bank made 5.2% and 10.0% of its HMDA loans in 2021 and 2022, respectively, in the moderate-income tracts. In 2021, the bank's lending in the moderate-income tracts is below demographics and aggregate lenders' performance. Demographics show that 10.7% of the AA's owner-occupied units are in the tracts. In 2022, the bank's lending in the moderate-income tracts is below aggregate lenders' performance and is comparable to demographics. Demographics show that 11.8% of the AA's owner-occupied units are in the tracts.

The LMI tracts include, for example, the university and the AFB, where demand for residential real estate credit is limited. Bank management and a community contact noted that the AA has low housing

inventory, and that other financial institutions compete for residential real estate loans in the area. As mentioned, significant rental and vacant housing also impacts the bank's ability to extend HMDA loans in these areas. Given this context, as well as branch locations, the bank's lending in certain moderate-income tracts, as well as the lack of lending in the low-income tract, is reasonable.

The bank's 2020 HMDA lending performance in LMI tracts was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The geographic distribution of small business loans is adequate. The tables below show the distribution of the bank's 2021 and 2022 small business loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 1 | 0.5 | 0.8 | 40 | 0.3 | 1.1 | 1.9 |
| Moderate | 9 | 4.4 | 11.7 | 216 | 1.4 | 12.2 | 11.3 |
| Middle | 144 | 70.6 | 58.8 | 9,874 | 61.8 | 51.7 | 62.0 |
| Upper | 50 | 24.5 | 28.5 | 5,843 | 36.6 | 35.0 | 24.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.0 | |
| Total | 204 | 100.0 | 100.0 | 15,973 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Grand Forks Multistate MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.0 | 0.4 |
| Moderate | 10 | 10.3 | 17.8 | 1,372 | 11.4 | 19.4 | 19.4 |
| Middle | 60 | 61.9 | 49.3 | 8,164 | 67.5 | 41.6 | 55.0 |
| Upper | 26 | 26.8 | 30.3 | 2,540 | 21.0 | 38.1 | 23.1 |
| Unknown | 1 | 1.0 | 2.0 | 10 | 0.1 | 0.8 | 2.0 |
| Tract-Unk | 0 | 0.0 | 0.5 | 0 | 0.0 | 0.1 | |
| Total | 97 | 100.0 | 100.0 | 12,086 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's small business lending was generally comparable with that of aggregate lenders and the demographics in the low-income tract in 2021. According to D&B data, only 1.9% of businesses were in the low-income tract for 2021. In 2022, the bank made no loans in the low-income census tract while aggregate lenders reported only 0.1% of loans in the tract. While the boundaries of the low-income census tract changed for 2022, the university remains located within it, which helps explain the low level of small business lending. Demographics show only 0.4% of businesses are in the tract in 2022.

For 2021 and 2022, the bank's small business lending was below aggregate lenders' activity and demographics in the moderate-income tracts. The D&B data shows 11.3% of businesses in 2021 and 19.4% of businesses in 2022 were in the moderate-income tracts. The bank's performance in these tracts is nonetheless reasonable given the comparison to demographics and the presence of strong competition located in or near several of the moderate-income tracts. The bank did not make loans in all moderate-income tracts, which is reasonable given the location of branches, the AFB, and the university. The bank made small business loans in most of the tracts in the AA.

The bank's 2020 small business lending performance in the LMI tracts was generally consistent with its 2021 and 2022 small business lending performance.

Small Farm. The geographic distribution of small farm loans is adequate. The following tables show the bank's distribution of 2021 and 2022 small farm loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Grand Forks Multistate MSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 0.7 | 1.2 | 47 | 0.3 | 1.0 | 0.8 |
| Middle | 129 | 84.9 | 84.0 | 13,514 | 92.3 | 84.3 | 87.4 |
| Upper | 22 | 14.5 | 14.7 | 1,076 | 7.4 | 14.7 | 11.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.0 | |
| Total | 152 | 100.0 | 100.0 | 14,637 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Grand Forks Multistate MSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 1.3 | 1.0 | 176 | 1.2 | 1.2 | 2.3 |
| Middle | 60 | 80.0 | 78.5 | 12,247 | 84.7 | 79.4 | 85.4 |
| Upper | 14 | 18.7 | 20.0 | 2,029 | 14.0 | 19.4 | 12.3 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.5 | 0 | 0.0 | 0.0 | |
| Total | 75 | 100.0 | 100.0 | 14,452 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank did not originate small farm loans in the low-income tract, which is explainable because part of UND's campus is located in this tract. This lack of lending is consistent with aggregate lending data, which does not show loans in the low-income tract. Demographic data shows that no farms are in the low-income tract for either year.

In 2021 and 2022, the bank originated only one small farm loan in each year in the moderate-income tracts. The bank's lending is comparable to aggregate lenders' performance and consistent with demographics, which show only 0.8% and 2.3% of farms are in the moderate-income tracts in 2021 and 2022, respectively.

The bank's performance in the LMI census tracts for both years reflects the AA characteristics. The low-income tract is near downtown Grand Forks and includes the university campus. Several of the moderate-income tracts are in or near downtown Grand Forks, the city of Crookston, and the Grand Forks AFB, where few farms, if any, are located. The city of Crookston and the Grand Forks AFB are also in moderate-income tracts. As a result, the opportunity to make small farm loans in the LMI census tracts is limited. The bank's small farm lending was in the rural portions of the AA, which are primarily middle-income tracts.

The bank's 2020 small farm lending performance in the LMI tracts was generally consistent with its 2021 and 2022 small farm lending performance.

Community Development Loans

The bank is a leader in making community development loans in the Grand Forks Multistate MSA AA. About half of the bank's community development loans in the AA are PPP loans, which demonstrates responsiveness to community needs during the pandemic. The bank also made many loans that helped businesses create or retain jobs for LMI

| Community Development Loans in the Grand Forks Multistate MSA AA | | |
|---|-----------|-------------------|
| Purpose | # | \$ |
| Affordable Housing | 4 | 2,615,048 |
| Economic Development | 18 | 23,227,856 |
| Revitalize or Stabilize | 5 | 1,640,967 |
| Total | 27 | 27,483,871 |

individuals in the AA. The bank's affordable housing loans financed multifamily dwellings with affordable rents, which respond to the need for affordable rental housing. The bank's community development lending reflects excellent responsiveness to community needs.

INVESTMENT TEST

The Investment Test rating is high satisfactory for the Grand Forks Multistate MSA AA. Overall, the bank made a significant level of qualified investments, including donations, in the AA, showing good responsiveness to area needs.

The bank made an adequate level of qualified investments. During the evaluation period, the bank purchased one MBS pool which helps support the affordable housing need in this AA. The amount of the pool benefiting this AA is \$674,999. For a portion of the evaluation period, the bank also continued to hold a prior-period bond that supported revitalization or stabilization in a qualified area; this investment was called in 2021. Bank management noted that limited opportunities exist in the AA for investments.

Donations. The bank made an excellent level of qualified investments in the form of donations in the AA. As shown in the table, the bank donated \$62,114 during the evaluation period primarily to organizations that provide community services to LMI individuals. These services included food, safety, healthcare, and shelter. The donations supported critical needs in the AA during the evaluation period.

| Qualified Investment Donations in the Grand Forks Multistate MSA AA | | |
|--|-----------------|------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Community Services | 50 | 56,814 |
| Economic Development | 2 | 5,000 |
| Revitalize or Stabilize | 3 | 300 |
| Total | 55 | 62,114 |

SERVICE TEST

The Service Test rating is low satisfactory for the Grand Forks Multistate MSA AA. Delivery systems are accessible to geographies and individuals throughout the AA. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank provides an adequate level of community development services.

Retail Services

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the AA and do not vary in a way that inconveniences LMI individuals or areas. During the evaluation period, the bank closed one cash-dispensing-only ATM in the AA; the bank did not close or open any branches.

The bank operates two full-service branches in the AA; one branch is in Grand Forks, and one is in East Grand Forks. Both branches have drive-up facilities and cash-dispensing-only ATMs, as well as Saturday and extended weekday hours. During the evaluation period, both branches were in middle-income census tracts; however, the branches were near LMI tracts.¹¹ In 2022, the Grand Forks branch was less than a half mile from two moderate-income tracts and approximately one mile from four other moderate-income tracts. In that same year, the East Grand Forks branch was approximately one mile from two moderate-income tracts. Prior to 2022, the Grand Forks branch was less than a half mile from one moderate-income

¹¹ Census data changes impacted the income-level designation of some tracts from 2021 to 2022, which altered the branches' proximity to certain tracts.

tract and approximately one mile from the low-income tract. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the bank's geographic distribution of branches and drive-up facilities in the AA in 2022, as well as demographic data.

| 2022 Geographic Distribution of Branches Assessment Area: Grand Forks Multistate MSA | | | | | | | | | | | |
|---|-----------------|----------|---------------|----------|------------|----------------|---------------|---------------------|--------|------------|------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 1 | 3.2% | 1.4% | 0.3% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Moderate | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 7 | 22.6% | 20.4% | 17.7% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Middle | Total | 2 | 100.0% | 0 | 0 | 2 | 2 | 2 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 16 | 51.6% | 52.6% | 58.1% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Upper | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 6 | 19.4% | 22.5% | 22.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Unknown | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 1 | 3.2% | 3.2% | 1.8% |
| | LS | 0 | | 0 | 0 | | | | | | |
| <i>Totals</i> | Total | 2 | 100.0% | 0 | 0 | 2 | 2 | 2 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 31 | 100.0% | 100.0% | 100.0% |
| | LS | 0 | | 0 | 0 | | | | | | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Community Development Services

The bank provides an adequate level of community development services in the Grand Forks Multistate MSA AA. During the evaluation period, five bank employees provided nine community development services. The bank's community development services benefited organizations that provide essential services to LMI individuals, such as advocacy, education, long-term elder care, and healthcare services. Bank employees served as board members for four organizations and one employee instructed financial education for children. Over the evaluation period, the bank's services addressed community needs, such as essential basic needs.

MINNESOTA

CRA RATING FOR Minnesota: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Minnesota AAs shows excellent responsiveness to local credit needs.
- Overall, lending to farms and businesses of different sizes and to LMI borrowers is excellent.
- Overall, the distribution of loans throughout the AAs is good.
- The bank is a leader in making community development loans.
- The bank makes use of flexible loan programs in its Minnesota branches.
- By number and dollar amount, the bank has a significant level of qualified investments, which exhibit good responsiveness to credit and community development needs.
- Bank retail services are accessible to businesses, farms, and residents throughout the AAs. The bank also provides a relatively high level of community development services in its Minnesota AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Minnesota is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed full-scope reviews for the Minneapolis-St. Paul MSA, Duluth MSA, and New Ulm-Mankato CSA AAs. Examiners weighted the Minneapolis-St. Paul MSA AA more than the Duluth MSA AA due to loan volume. The New Ulm-Mankato CSA AA received less weight.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Ada, Baxter Lakes, Bird Island-Fairfax-Hector, Clinton, Lonsdale-Goodhue, Pine City, St. Cloud MSA, and Warren-Oslo AAs in Minnesota. Examiners evaluated whether the bank's performance in the limited-scope AAs was consistent with its performance in the full-scope AAs. The limited-scope MSA AA was compared against metropolitan full-scope AAs. Similarly, the nonmetropolitan limited-scope AAs were compared to the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MINNESOTA

Assessment Area Information. The bank had 11 AAs in the state for the entirety of the evaluation period. The bank made minimal changes to the composition of its AAs since the last evaluation; the changes were due to U.S. OMB MSA and CSA delineation updates, new branches, and lending activity.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank ranks fourteenth among 316 FDIC-insured institutions in Minnesota, with 0.7% of the state's deposits. Two large national banks have 52.6% combined of the deposit market share in Minnesota. The bank operates in a competitive environment in many of its Minnesota AAs. Most AAs include numerous types of financial institutions,

including community banks and large regional and national banks. Credit unions also compete for deposits and loans in several of the bank's AAs. Credit union deposits are not included in the FDIC Deposit Market Share Report.

According to 2022 FFIEC adjusted census data, the Minnesota AAs included 1,031 census tracts: 52 low-, 222 moderate-, 483 middle-, 260 upper-, and 14 unknown-income tracts. During 2022 and 2021, nine of the nonmetropolitan middle-income tracts in Minnesota were classified as underserved, six were classified as distressed, and one was classified as underserved and distressed. For 2020, nine were classified as underserved and 12 were classified as distressed.

Population. The total population represented in the bank's Minnesota AAs is 4,019,213, or 70.4% of the state's population (5,706,494). FFIEC adjusted census data for 2022 also shows that 74.0% of households and 77.7% of families reside in middle- and upper-income census tracts. Approximately 8.9% of households and 5.5% of families in the AAs are below the poverty level. Most (52.2%) residents in the Minnesota AAs are between the ages of 25 to 64 years old. The remaining age groups are as follows: 22.5% for residents 17 years and younger, 8.7% for residents 18 to 24 years, and 14.6% for residents aged 65 and older.

General Economic and Housing Information. Economic conditions in the bank's Minnesota AAs varied by market during the evaluation period. Some of the AAs include urban areas with cities that are regional hubs and have diversity in their primary industries, while others are more rural and have less diverse economies or are more dependent on agriculture. The pandemic impacted the AAs to different degrees. Overall, most AAs fared reasonably well through the end of 2020 despite the challenges from the pandemic. Many businesses, including agricultural producers, participated in government programs for monetary assistance to pay employees or offset lost income due to low commodity prices. Despite the impact of the pandemic in 2020, construction and development occurred in some AAs during the evaluation period.

A variety of industries impact Minnesota's economy. The primary industries in the Minnesota AAs include government, healthcare, agriculture, retail, tourism/hospitality, higher education, technology, and manufacturing.

The Minnesota housing market varies by region. In most areas, however, housing demand, prices, and new build costs have increased. Inventory for homebuyers is limited in areas and changes quickly based on demand. These factors contribute to a preexisting housing shortage, including affordable housing, in certain areas.

According to 2022 FFIEC adjusted census data, in the Minnesota AAs, 65.0% of the housing was owner occupied, 27.8% was rental, and 7.2% was vacant. The median housing value was \$255,224. The lowest median housing values were in Traverse and Norman counties, at \$85,700 and \$107,600, respectively. Scott County had the highest median value at \$317,500. The median age of housing stock was 49 years. Scott County had the newest housing stock at 24 years, and Renville County had the oldest housing stock age at 64 years.

In many of the Minnesota AAs, the bank operates in very competitive markets. Various types of financial institutions and creditors operate in the AAs, and as a result, the competition for loans, deposits, and community development activities is typically strong. Aside from the types of financial institutions noted above, the bank also competes with other creditors, such as specialized agricultural lenders and mortgage companies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

Examiners based the bank's Minnesota evaluation on full-scope reviews of the Minneapolis-St. Paul MSA, Duluth MSA, and New Ulm-Mankato CSA AAs and limited-scope reviews of the remaining Minnesota AAs. A detailed discussion of the bank's performance in the full-scope AAs and a shorter discussion of the limited-review AAs follow this section. For the limited-scope AAs, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Minnesota is outstanding based on the bank's performance under the Lending, Investment, and Service Tests.

The Lending Test rating is outstanding. The bank's lending activity reflects excellent responsiveness to credit needs throughout the bank's Minnesota AAs. The overall distribution of HMDA, small business, and small farm loans by borrower income and revenue size is excellent. Overall, the geographic distribution of HMDA, small business, and small farm loans is good. The bank is a leader in making community development loans. The bank also used flexible loan programs to help meet credit needs.

The Investment Test rating is high satisfactory. The bank made a significant level of qualified investments that show good responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. Delivery systems are accessible to the geographies of the Minnesota AAs and to individuals of different income levels. The bank provides a relatively high level of community development services in the AAs.

LENDING TEST

The Lending Test rating is outstanding for Minnesota.

Lending Activity

Overall, the bank's lending levels reflect excellent responsiveness to credit needs in its Minnesota AAs. The table below shows the bank's lending in its Minnesota AAs by product type for the three-year evaluation period.

| Summary of Lending Activity in the Minnesota AAs | | | | |
|--|-----------|-------|-----------|-------|
| Loan Type | 2020–2022 | | | |
| | # | % | \$(000) | % |
| HMDA-reportable | 4,057 | 36.7 | 877,729 | 52.0 |
| Small Business-reportable | 4,656 | 42.1 | 576,202 | 34.2 |
| Small Farm-reportable | 2,346 | 21.2 | 232,585 | 13.8 |
| Total Loans | 11,059 | 100.0 | 1,686,516 | 100.0 |

The bank's Minnesota AAs account for 83.9% by number and 85.4% by amount of the bank's lending activity during the evaluation period. Small business lending volume during 2020 and 2021 includes the bank's PPP lending.

In many of the Minnesota AAs, the bank was among the leading lenders for small business and small farm loans.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The bank extends loans to LMI borrowers and to small businesses and small farms throughout the AAs. In addition, the overall geographic distribution of loans is good. The bank extends loans throughout its AAs, including LMI tracts.

During the evaluation period, the bank used flexible loan programs (primarily PPP and other SBA programs) totaling approximately \$240.6 million in its Minnesota AAs; these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Minneapolis-St. Paul MSA, Duluth MSA, and New Ulm-Mankato CSA AAs. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.

Community Development Loans

The bank is a leader in making community development loans in the Minnesota AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs. As shown in the table, the bank originated or renewed 314 community development loans totaling \$284.2 million.

| Minnesota Community Development Loans | | |
|---------------------------------------|------------|--------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 16 | 9,523,993 |
| Community Service | 22 | 9,392,637 |
| Economic Development | 154 | 180,699,613 |
| Revitalize or Stabilize | 122 | 84,632,239 |
| Total | 314 | 284,248,482 |

The bank's community development lending benefited all of the bank's Minnesota AAs. By number and dollar, the bank had the most loans in the Minneapolis-St. Paul MSA and Duluth MSA AAs. However, many of the bank's Minnesota AAs had substantial community development loan activity by number and dollar volume. The bank's lending mostly supported economic development and the revitalization or stabilization of qualified areas; many loans with these purposes include the bank's PPP loans that originated in 2020 and 2021. Those loans helped support the local economy and workers during the height of the pandemic. The bank also made community development loans that supported affordable housing or the provision of community services to LMI individuals and families, which were identified needs in some of the bank's AAs. Overall, the bank's community development lending shows excellent responsiveness to AA needs.

Given this responsiveness, examiners can also consider any qualified community development loans benefiting geographies outside the bank's Minnesota AAs. The bank originated 24 such loans totaling \$30.3 million in areas of Minnesota. The loans supported economic development, revitalization or stabilization of qualified areas, and affordable housing. Some of the bank's PPP loans were also included in these loans. The table above does not include these loans.

INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for Minnesota. This conclusion primarily reflects the bank's performance in the full-scope AAs. The bank has a significant level of qualified investments in the form of securities and donations that show good responsiveness to credit and community development needs.

During the evaluation period, the bank made a significant level of qualified investments. The bank made 15 investments totaling \$7.4 million in several AAs, including broader regional or statewide areas in Minnesota that include the bank's AAs. The bank's investments helped support the provision of community services to LMI individuals and families, the revitalization or stabilization of qualified tracts, and affordable housing. The bank purchased investments that supported the improvements of school districts or infrastructure and development in qualified areas. For example, one investment financed development in a tax increment financing district, which impacted a moderate-income area. The bank also purchased \$2.9 million in MBS that supported affordable housing, a need in many AAs, including in the AAs where the bank had the qualified investment.

During the evaluation period, the bank also held 20 prior-period investments totaling \$6.4 million in the bank's Minnesota AAs, which supported the provision of community services to LMI individuals and families, the revitalization or stabilization of qualified tracts, and affordable housing. Finally, the bank held eight prior-period investments totaling \$3.0 million that benefited regional or statewide areas of the state, including the bank's AAs; these investments supported affordable housing and the revitalization or stabilization of qualified tracts.

Given this responsiveness, examiners can also consider any qualified community development investments benefiting geographies outside the bank's Minnesota AAs. The bank purchased four such investments totaling \$1.2 million in areas of Minnesota. The bank also held six prior-period investments totaling \$1.8 million. All of these investments supported the revitalization or stabilization of qualified tracts.

Donations. The bank made a significant level of donations during the evaluation period, totaling \$439,512. Most donations directly benefited the bank's Minnesota AAs. Additional donations (\$65,303) benefited statewide or regional areas in Minnesota that include the bank's AAs. The following table shows the distribution of the donations by AA, as well as at the statewide or regional level.

| Minnesota Qualified Investment Donations | | |
|---|--------------|----------------|
| <i>AA</i> | Total | |
| | # | \$ |
| Minneapolis-St. Paul MSA | 104 | 77,873 |
| New Ulm-Mankato CSA | 48 | 29,980 |
| Duluth MSA | 87 | 138,995 |
| Ada | 18 | 4,336 |
| Baxter Lakes | 32 | 17,149 |
| Bird Island-Fairfax-Hector | 44 | 24,303 |
| Clinton | 22 | 28,744 |
| Lonsdale-Goodhue | 9 | 8,110 |
| Pine City | 21 | 20,202 |
| Warren-Oslo | 21 | 18,817 |
| St. Cloud MSA | 14 | 5,700 |
| Regional/Statewide Minnesota | 80 | 65,303 |
| Total | 500 | 439,512 |

By number and dollar, the bank made most of its donations in the Minneapolis-St. Paul MSA and Duluth MSA AAs. The bank made donations in each Minnesota AA, as well as statewide or regional areas in Minnesota that include the bank's AAs. A significant amount of donations (\$192,276) went to organizations that provide community services to LMI individuals and families. For example, in many AAs, the bank's donations helped with food insecurity or other basic needs, such as healthcare services or

temporary shelter, which are impactful based on identified need, especially during the pandemic. The bank also made significant donations (\$217,080) that supported the revitalization or stabilization of qualified areas. For example, donations benefited school programs or funded other essential needs that help retain residents in qualified areas. Lastly, the bank made some donations that supported affordable housing and economic development. The bank's donations show good responsiveness to community needs.

Given this responsiveness, examiners can also consider any qualified community development donations benefiting geographies outside the bank's Minnesota AAs. During the evaluation period, the bank donated \$5,540 to support the revitalization or stabilization of qualified tracts outside of the bank's AAs. The table above does not include these donations.

SERVICE TEST

The Service Test rating is high satisfactory for Minnesota. Delivery systems are accessible to all portions of the Minnesota AAs. The changes the bank made to branches and ATMs did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that inconveniences certain individuals or areas. Finally, the bank provides a relatively high level of community development services in the Minnesota AAs.

Retail Banking Services

The bank's delivery systems are accessible to residents and geographies throughout the bank's Minnesota AAs. At the time of the evaluation, the bank operated 34 offices (including limited-service facilities) in the state; nearly all branches have drive-ups and some have ATMs. The bank also operates two stand-alone ATMs. Certain bank branches have extended and weekend hours.

While the bank made some changes to its branches and ATMs during the evaluation, the changes did not adversely affect delivery systems. Given merger activity, the bank added new locations: three in the Lonsdale-Goodhue AA (one in Pine Island and two in Zumbrota), and one in the Minneapolis-St. Paul MSA AA in Vadnais Heights. The bank opened a branch in Hermantown in the bank's Duluth MSA AA. In addition, the bank closed one office in the Baxter Lakes AA. In the New Ulm-Mankato CSA AA, the bank closed three offices, which were near the bank's other existing offices, and relocated one office to a nearby location.

The following table shows the bank's distribution of branches and drive-up facilities as of 2022.¹²

¹² The bank's relocation of the North Mankato office at 245 Belgrade Avenue to the new full-service North Mankato branch location at 240 Belgrade Avenue is shown as a branch closure and a branch opening in the table; however, for analysis purposes, this change was appropriately considered as a relocation.

| Geographic Distribution of Branches State of Minnesota 2022 | | | | | | | | | | | |
|--|----------------|-----------|---------------|----------|------------|----------------|---------------|---------------|-------|------------|------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 1 | 2.9% | 0 | 0 | 1 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 52 | 5.0% | 4.3% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Moderate | Total | 2 | 5.9% | 0 | 0 | 2 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 222 | 21.5% | 21.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Middle | Total | 23 | 67.7% | 1 | 4 | 21 | 3 | 6 | | | |
| | DTO | 0 | | 0 | 1 | 0 | | | 483 | 46.8% | 47.6% |
| | LS | 1 | | 0 | 1 | | | | | | |
| Upper | Total | 7 | 20.6% | 4 | 1 | 7 | 3 | 4 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 260 | 25.2% | 26.4% |
| | LS | 0 | | 0 | 1 | | | | | | |
| Unknown | Total | 1 | 2.9% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 14 | 1.4% | 0.7% |
| | LS | 0 | | 0 | 0 | | | | | | |
| <i>Totals</i> | Total | 34 | 100.0% | 5 | 5 | 31 | 6 | 10 | | | |
| | DTO | 1 | | 0 | 1 | 0 | | | 1,031 | 100.0% | 100.0% |
| | LS | 1 | | 0 | 2 | | | | | | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

As shown in the table, overall, the bank has 2.9% and 5.9% of its branches in LMI census tracts, respectively. The bank has no ATMs in low-income tracts and 4.8% of its ATMs in moderate-income tracts. The percentage of the bank's branches and ATMs in LMI census tracts are below demographics, which show that 5.0% and 21.5% of the AA tracts are LMI, respectively.

Refer to the Institution section of this evaluation for details on the bank's additional delivery services.

Community Development Services

Overall, the bank provides a relatively high level of community development services in the Minnesota AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs. The bank also provided services in statewide or regional areas in Minnesota that include the bank's AAs. Most of the services were in the Minneapolis-St. Paul MSA AA. The table below shows the distribution of community development services by type of activity and AA.

| Minnesota Community Development Services | | | | | |
|--|---------------------------|---------------------------|-----------------------------|--------------------------------|--------------|
| <i>AA</i> | <i>Affordable Housing</i> | <i>Community Services</i> | <i>Economic Development</i> | <i>Revitalize or Stabilize</i> | <i>Total</i> |
| Minneapolis-St. Paul MSA | 3 | 17 | 16 | 16 | 52 |
| New Ulm-Mankato CSA | 0 | 7 | 7 | 0 | 14 |
| Duluth MSA | 1 | 3 | 8 | 2 | 14 |
| Ada | 0 | 0 | 1 | 0 | 1 |
| Baxter Lakes | 0 | 1 | 0 | 0 | 1 |
| Bird Island-Fairfax-Hector | 0 | 1 | 1 | 10 | 12 |
| Clinton | 2 | 0 | 0 | 0 | 2 |
| Lonsdale-Goodhue | 0 | 1 | 3 | 0 | 4 |
| Pine City | 0 | 3 | 1 | 7 | 11 |
| Warren-Oslo | 3 | 0 | 0 | 0 | 3 |
| St. Cloud MSA | 0 | 1 | 1 | 0 | 2 |
| Regional and Statewide Minnesota | 5 | 11 | 4 | 0 | 20 |
| Total | 14 | 45 | 42 | 35 | 136 |

Numerous bank employees devoted time to providing financial expertise to organizations that support community development initiatives. In many cases, employees served in leadership roles, such as board or committee members. Most of the bank's community development services provided expertise to organizations facilitating community services for LMI individuals or families, revitalization or stabilization of qualified areas, and economic development. Bank employees also provided some services to organizations supporting affordable housing. The bank's services are responsive to the community development needs in the bank's AAs.

Given this responsiveness, examiners can also consider any qualified community development services benefiting geographies outside the bank's Minnesota AAs. During the evaluation period, an employee provided a service to an organization that supported the revitalization or stabilization of qualified tracts. The table above does not include this service.

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MINNESOTA-WISCONSIN, MSA ASSESSMENT AREA

Bank Information. The bank operates eight full-service branches in the Minneapolis-St. Paul MSA AA. The branches are in Apple Valley, Braham, Forest Lake, Jordan, Lakeville, Montgomery, Vadnais Heights, and Waterville. The bank's Vadnais Heights office is new since the previous evaluation due to the bank's merger with Peoples Bank Midwest on October 17, 2020. All branches have drive-up facilities; three locations have cash-dispensing-only ATMs. The bank also operates one cash-dispensing-only ATM at a retail location. By number, the bank has 20.5% of its offices (including drive-up facilities) in this AA. Refer to the Service Test section for this AA and Institution section of the evaluation for more details on the bank's retail services.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank ranked 28th among 138 FDIC-insured institutions operating in the Minneapolis-St. Paul-Bloomington, MN-WI MSA (Minneapolis-St. Paul MSA), with a 0.2% deposit market share and \$531.0 million in deposits. The deposits in this AA represent 21.6% of the bank's overall deposits. The bank competes with various types of financial institutions in this AA, including community, regional, and large national banks, as well as credit unions. Credit unions are not represented in the FDIC deposit market share information.

Assessment Area Information. The Minneapolis-St. Paul MSA AA is in the east-central portion of Minnesota. The AA includes Anoka, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Ramsey, Scott, Sherburne, and Washington counties, which are part of the Minneapolis-St. Paul MSA. Since the previous evaluation, the bank added Sherburne County to its AA and omitted one tract from Waseca County, which is not included in the MSA. In addition, during the evaluation period, the number of census tracts in the AAs and income classifications of some tracts changed based on FFIEC adjusted census data. In 2020, this AA had 54 low-, 164 moderate-, 301 middle-, 184 upper-, and seven unknown-income census tracts. In 2021, this AA had 54 low-, 165 moderate-, 309 middle-, 185 upper-, and seven unknown-income census tracts. In 2022, this AA had 49 low-, 179 moderate-, 350 middle-, 218 upper-, and 11 unknown-income census tracts. The unknown-income census tracts include Fort Snelling, the Minneapolis-St. Paul International Airport, transit areas and rail lines, a university, a correctional facility, and park land.

The AA is geographically diverse and includes urban areas (largely the cities of Minneapolis and St. Paul and surrounding cities) and rural areas, including some agricultural land. The Shakopee Mdewakanton Sioux Community is in Scott County. The Prairie Island Indian Community's trust land is in Dakota County.

The following Combined Demographics Report provides demographic information for this AA, based on 2022 FFIEC adjusted census data and D&B data.¹³

¹³ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the OMB revised MSA delineations.

| Combined Demographics Report | | | | | | | | |
|----------------------------------|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| 2022 Minneapolis-St. Paul MSA AA | | | | | | | | |
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 49 | 6.1 | 34,888 | 4.4 | 9,223 | 26.4 | 156,173 | 19.9 |
| Moderate | 179 | 22.2 | 146,762 | 18.7 | 14,442 | 9.8 | 141,417 | 18.0 |
| Middle | 350 | 43.4 | 363,996 | 46.4 | 13,320 | 3.7 | 177,840 | 22.7 |
| Upper | 218 | 27.0 | 236,961 | 30.2 | 4,583 | 1.9 | 308,794 | 39.4 |
| Unknown | 11 | 1.4 | 1,647 | 0.2 | 233 | 14.1 | 0 | 0.0 |
| Total AA | 807 | 100.0 | 784,224 | 100.0 | 41,801 | 5.3 | 784,224 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 67,976 | 21,308 | 2.5 | 31.3 | 42,337 | 62.3 | 4,331 | 6.4 |
| Moderate | 275,892 | 147,460 | 17.1 | 53.4 | 116,496 | 42.2 | 11,936 | 4.3 |
| Middle | 584,389 | 418,332 | 48.5 | 71.6 | 141,676 | 24.2 | 24,381 | 4.2 |
| Upper | 362,345 | 273,989 | 31.8 | 75.6 | 73,320 | 20.2 | 15,036 | 4.1 |
| Unknown | 8,557 | 724 | 0.1 | 8.5 | 7,249 | 84.7 | 584 | 6.8 |
| Total AA | 1,229,159 | 861,813 | 100.0 | 66.3 | 381,078 | 29.3 | 56,268 | 4.3 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 6,253 | 3.7 | 5,599 | 3.7 | 592 | 4.3 | 62 | 3.7 |
| Moderate | 29,976 | 17.9 | 26,953 | 17.7 | 2,793 | 20.3 | 230 | 13.7 |
| Middle | 73,845 | 44.0 | 67,235 | 44.1 | 5,895 | 42.9 | 715 | 42.6 |
| Upper | 56,312 | 33.6 | 51,338 | 33.7 | 4,311 | 31.4 | 663 | 39.5 |
| Unknown | 1,339 | 0.8 | 1,186 | 0.8 | 144 | 1.0 | 9 | 0.5 |
| Total AA | 167,725 | 100.0 | 152,311 | 100.0 | 13,735 | 100.0 | 1,679 | 100.0 |
| Percentage of Total Businesses: | | | | 90.8 | | 8.2 | | 1.0 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 16 | 0.8 | 16 | 0.8 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 164 | 7.7 | 158 | 7.6 | 4 | 11.4 | 2 | 33.3 |

| Combined Demographics Report | | | | | | | | |
|--|-------|-------|-------|-------|----|-------|---|-------|
| 2022 Minneapolis-St. Paul MSA AA | | | | | | | | |
| Middle | 1,262 | 59.2 | 1,238 | 59.3 | 21 | 60.0 | 3 | 50.0 |
| Upper | 683 | 32.1 | 672 | 32.2 | 10 | 28.6 | 1 | 16.7 |
| Unknown | 5 | 0.2 | 5 | 0.2 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 2,130 | 100.0 | 2,089 | 100.0 | 35 | 100.0 | 6 | 100.0 |
| Percentage of Total Farms: | | | | 98.1 | | 1.6 | | 0.3 |
| Source: 2022 FFIEC Census Data and 2022 D&B Information | | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Minneapolis-St. Paul MSA, for the year of loan origination. In 2020, this evaluation also used the FFIEC's estimated median family income for the nonmetropolitan areas of Minnesota. The tables below show the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

| Borrower Income Levels Minneapolis-St. Paul, MN MSA | | | | |
|--|--------------|---------------------|----------------------|---------------------|
| FFIEC Estimated Median Family Income | Low | Moderate | Middle | Upper |
| | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above |
| 2020 \$93,700 | 0 - \$46,849 | \$46,850 - \$74,959 | \$74,960 - \$112,439 | \$112,440 - & above |
| 2021 \$100,600 | 0 - \$50,299 | \$50,300 - \$80,479 | \$80,480 - \$120,719 | \$120,720 - & above |
| 2022 \$117,800 | 0 - \$58,899 | \$58,900 - \$94,239 | \$94,240 - \$141,359 | \$141,360 - & above |

| Borrower Income Levels Nonmetropolitan Areas of Minnesota | | | | |
|--|--------------|---------------------|---------------------|--------------------|
| FFIEC Estimated Median Family Income | Low | Moderate | Middle | Upper |
| | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above |
| 2020 \$70,900 | 0 - \$35,449 | \$35,450 - \$56,719 | \$56,720 - \$85,079 | \$85,080 - & above |

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Minneapolis-St. Paul MSA, which was \$84,589 for 2020 and 2021, and \$103,977 for 2022, as well as the median family income for the nonmetropolitan areas of Minnesota in 2020, which was \$63,045.

Population. According to the 2022 FFIEC adjusted census data, the population of the AA is 3,279,795. Hennepin County has the highest percentage (39.1%) of the AA population, followed by Ramsey County (16.8%) and Dakota County (13.4%). The majority (52.9%) of the population is between 25 to 64 years of age. Individuals 17 years or younger comprise 22.9% of the population, 13.8% are residents 65 years and over, and 8.2% are residents aged 18 to 24 years.

Housing Information. According to 2022 FFIEC adjusted census data, the AA has 1,299,159 housing units; 66.3% are owner-occupied, 29.3% are rental units, and 4.3% are vacant. The median age of the

housing stock is 48 years, which is slightly higher than the Minnesota statewide median age of 43 years. The median housing value is \$272,560, and the affordability ratio is 29.9, which is comparable to the affordability ratio of 31.1 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

A community contact stated that housing for LMI individuals and families within the seven-county metropolitan area is challenging. The contact and bank management noted a shortage of affordable housing for lower-income individuals. Starter homes in the area have continued to increase in value and are generally unaffordable. While new developments continue to be constructed, the building is not occurring at a rapid pace and the cost of new homes is not affordable for most lower-income individuals. Bank management noted that newly built homes are valued starting around \$420,000. Buyers seek out homes priced in the \$200,000 to \$250,000 range, but homes at that price aren't available. Taxes and high interest rates also impact affordability for potential buyers. A contact and bank management noted the prevalence of investment properties in the area. Older, entry level homes are typically purchased by investors. Homeownership by out-of-state investors has increased. Bank management also noted the rental vacancy rates are low in the area.

The table below shows the housing cost burden for renters and owners by geography and income level in the AA, Minneapolis-St. Paul MSA, counties in the AA, and state of Minnesota. As reflected in the table, renters and homeowners in the low-income bracket greatly exceed HUD's 30% cost-burden threshold. Renters and homeowners in the moderate-income bracket fare much better than low-income renters and homeowners, but in many cases, their cost-burden is near or just above the HUD threshold. Overall, the cost burden for renters and homeowners in the AA is generally comparable to the cost burden for those in statewide Minnesota.

| Housing Cost Burden | | | | | | |
|--|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area | Cost Burden - Renters | | | Cost Burden - Owners | | |
| | Low Income | Moderate Income | All Renters | Low Income | Moderate Income | All Owners |
| Minneapolis-St. Paul MSA AA | 74.5% | 28.2% | 42.0% | 62.0% | 28.2% | 16.9% |
| Anoka County, MN | 76.4% | 27.1% | 41.6% | 61.6% | 23.2% | 16.8% |
| Chisago County, MN | 62.7% | 12.9% | 38.5% | 61.8% | 28.3% | 19.1% |
| Dakota County, MN | 75.1% | 30.9% | 41.6% | 61.2% | 30.9% | 15.6% |
| Hennepin County, MN | 74.4% | 30.1% | 41.0% | 65.0% | 29.7% | 17.6% |
| Isanti County, MN | 67.5% | 21.3% | 42.3% | 58.2% | 25.6% | 19.8% |
| Le Sueur County, MN | 60.8% | 31.1% | 37.3% | 56.0% | 30.0% | 15.5% |
| Ramsey County, MN | 73.8% | 21.7% | 44.4% | 59.2% | 23.8% | 17.1% |
| Scott County, MN | 77.1% | 28.2% | 43.6% | 62.7% | 42.5% | 17.8% |
| Sherburne County, MN | 68.0% | 10.0% | 34.5% | 54.9% | 30.5% | 15.9% |
| Washington County, MN | 81.8% | 43.8% | 45.5% | 61.1% | 26.9% | 15.2% |
| Minneapolis-St. Paul-Bloomington, MN-WI MSA | 73.9% | 27.3% | 41.5% | 61.8% | 28.5% | 16.9% |
| Minnesota | 71.3% | 25.6% | 40.7% | 59.4% | 26.7% | 16.7% |
| Cost Burden is housing cost that equals 30 percent or more of household income | | | | | | |
| Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy | | | | | | |

General Economic and Business Information. According to a community contact, the local economy is stable. Given the size and composition (a large metropolitan area with some rural areas) of the AA, economic conditions can somewhat vary by area. The AA has a diverse economy with industries such as health care, education, finance (including banking and insurance), entertainment (including performance arts, concerts, and professional sports), food services, construction, and retail and hospitality. The Minneapolis-St. Paul MSA includes the headquarters of a variety of Fortune 500 companies and a variety of smaller businesses. Major local employers include health care facilities, county and state government, local school districts, higher education facilities, retailers, restaurants, and financial institutions. During the evaluation period, the onset of the pandemic prompted businesses to shut down and lay off employees, especially smaller businesses. Large employers made strong efforts to retain employees. Many companies have adopted a hybrid work approach due to the pandemic.

Agriculture is primarily in Dakota, Isanti, Le Sueur, and Scott counties. Commodity prices have been good, and generally, farmers are doing well; the agricultural sector has been strong. Corn and soybeans are the primary crops in the area. Some dairy operations are also located here. Input costs increased notably in 2022. Bank management noted that farms are getting bigger; small farms are being sold to larger operations rather than transitioning from one generation of family to the next. Small farms can find it hard to compete with larger operations, especially given high land prices. During the pandemic, farmers had more cash on hand and demand for traditional agricultural bank loans was down due to the availability of PPP lending.

The annual average unemployment rate for the AA was relatively consistent with the rate for statewide Minnesota from 2020 to 2022. The annual average unemployment rates in 2020 were higher than 2021 and 2022 given the onset of the pandemic. The rates declined over 2021 and 2022 as typical business operations resumed. The following table provides the annual average unemployment rates for the AA, counties in the AA, the MSA, and the state of Minnesota.¹⁴

| Annual Average Unemployment Rates | | | |
|---|------|------|------|
| Area | 2020 | 2021 | 2022 |
| Minneapolis-St. Paul MSA AA | 6.5% | 3.8% | 2.5% |
| Anoka County, MN | 6.4% | 3.8% | 2.6% |
| Chisago County, MN | 6.7% | 4.1% | 3.1% |
| Dakota County, MN | 6.3% | 3.5% | 2.4% |
| Hennepin County, MN | 6.6% | 3.8% | 2.5% |
| Isanti County, MN | 6.8% | 4.5% | 3.4% |
| Le Sueur County, MN | 6.9% | 4.6% | 3.6% |
| Ramsey County, MN | 7.0% | 4.2% | 2.7% |
| Scott County, MN | 5.9% | 3.4% | 2.3% |
| Sherburne County, MN | 6.2% | 3.9% | 2.9% |
| Washington County, MN | 5.7% | 3.3% | 2.3% |
| Minneapolis-St. Paul-Bloomington, MN-WI MSA | 6.5% | 3.8% | 2.6% |
| Minnesota | 6.3% | 3.8% | 2.7% |

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

¹⁴ The Minneapolis-St. Paul MSA AA row in the table includes county-level data for all counties in the bank's AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MINNESOTA-WISCONSIN, MSA ASSESSMENT AREA

The bank's Lending Test performance in the Minneapolis-St. Paul MSA AA is excellent. Lending levels show good responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. Overall, the geographic distribution of loans is good. The bank is a leader in making community development loans. The bank extensively uses flexible loan programs. Examiners assigned the most weight to HMDA and small business loans, followed by small farm loans based on loan number volume during the evaluation period.

The Investment Test performance in this AA is significant. The bank made a significant level of qualified investments, including donations, which shows good responsiveness to credit and community development needs.

Under the Service Test, delivery systems are accessible to all portions of the AA and do not vary in a way that inconveniences certain individuals or areas. Further, the bank is a leader in providing community development services.

LENDING TEST

The bank's Lending Test performance in the Minneapolis-St. Paul MSA AA is excellent.

Lending Activity

Overall, the bank's lending activity reflects good responsiveness to AA credit needs. For HMDA loans, the bank ranked 69th among 697 lenders in 2021, and 74th among 682 lenders in 2022, with 0.2% market share each year. For small business and small farm loans, the bank ranked 15th among 219 lenders reporting CRA-reportable loans in 2021, with a 0.9% market share. In 2022, the bank ranked 22nd among 176 lenders reporting CRA-reportable loans, with a 0.5% market share. During the evaluation period, lending activity in this AA represented 23.6% by number and 30.0% by dollar amount of the bank's total lending. Within the Minnesota AAs, the lending activity in the Minneapolis-St. Paul MSA AA was 28.2% by number and 35.1% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses and Farms

Overall, the bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 10 | 6.5 | 10.2 | 1,721 | 4.0 | 6.0 | 20.3 |
| Moderate | 25 | 16.1 | 24.5 | 4,971 | 11.6 | 19.5 | 17.2 |
| Middle | 32 | 20.6 | 20.2 | 9,191 | 21.5 | 19.8 | 21.9 |
| Upper | 47 | 30.3 | 25.9 | 19,055 | 44.5 | 36.2 | 40.6 |
| Unknown | 41 | 26.5 | 19.2 | 7,902 | 18.4 | 18.6 | 0.0 |
| Total | 155 | 100.0 | 100.0 | 42,840 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 30 | 8.6 | 8.3 | 3,727 | 4.3 | 4.9 | 20.3 |
| Moderate | 74 | 21.3 | 20.4 | 13,240 | 15.3 | 15.4 | 17.2 |
| Middle | 89 | 25.6 | 22.6 | 19,774 | 22.8 | 20.6 | 21.9 |
| Upper | 143 | 41.1 | 33.2 | 46,957 | 54.1 | 42.4 | 40.6 |
| Unknown | 12 | 3.4 | 15.5 | 3,079 | 3.5 | 16.6 | 0.0 |
| Total | 348 | 100.0 | 100.0 | 86,777 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 5.0 | 0 | 0.0 | 3.7 | 20.3 |
| Moderate | 2 | 40.0 | 14.4 | 132 | 38.2 | 10.8 | 17.2 |
| Middle | 1 | 20.0 | 22.5 | 150 | 43.4 | 18.1 | 21.9 |
| Upper | 2 | 40.0 | 53.7 | 64 | 18.5 | 61.6 | 40.6 |
| Unknown | 0 | 0.0 | 4.4 | 0 | 0.0 | 5.8 | 0.0 |
| Total | 5 | 100.0 | 100.0 | 346 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 40 | 7.8 | 8.8 | 5,448 | 4.2 | 5.3 | 20.3 |
| Moderate | 102 | 19.9 | 21.5 | 18,671 | 14.3 | 17.0 | 17.2 |
| Middle | 122 | 23.8 | 21.6 | 29,115 | 22.3 | 20.1 | 21.9 |
| Upper | 195 | 38.1 | 31.5 | 66,526 | 50.9 | 40.1 | 40.6 |
| Unknown | 53 | 10.4 | 16.7 | 10,981 | 8.4 | 17.5 | 0.0 |
| Total | 512 | 100.0 | 100.0 | 130,741 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 4.7 | 0 | 0.0 | 3.0 | 20.3 |
| Moderate | 0 | 0.0 | 14.6 | 0 | 0.0 | 9.4 | 17.2 |
| Middle | 0 | 0.0 | 22.0 | 0 | 0.0 | 16.0 | 21.9 |
| Upper | 0 | 0.0 | 54.3 | 0 | 0.0 | 66.8 | 40.6 |
| Unknown | 0 | 0.0 | 4.4 | 0 | 0.0 | 4.8 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 12.8 | 0 | 0.0 | 6.7 | 20.3 |
| Moderate | 1 | 25.0 | 23.1 | 328 | 42.2 | 12.9 | 17.2 |
| Middle | 0 | 0.0 | 19.5 | 0 | 0.0 | 13.7 | 21.9 |
| Upper | 3 | 75.0 | 39.8 | 450 | 57.8 | 58.6 | 40.6 |
| Unknown | 0 | 0.0 | 4.8 | 0 | 0.0 | 8.1 | 0.0 |
| Total | 4 | 100.0 | 100.0 | 778 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.5 | 20.3 |
| Moderate | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.2 | 17.2 |
| Middle | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.3 | 21.9 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 40.6 |
| Unknown | 0 | 0.0 | 98.9 | 0 | 0.0 | 99.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 14 | 10.1 | 10.8 | 1,986 | 4.3 | 5.9 | 19.9 |
| Moderate | 27 | 19.6 | 25.1 | 7,018 | 15.4 | 19.5 | 18.0 |
| Middle | 30 | 21.7 | 20.5 | 9,306 | 20.4 | 20.4 | 22.7 |
| Upper | 48 | 34.8 | 23.7 | 23,717 | 51.9 | 35.2 | 39.4 |
| Unknown | 19 | 13.8 | 19.9 | 3,676 | 8.0 | 19.0 | 0.0 |
| Total | 138 | 100.0 | 100.0 | 45,703 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 10 | 19.2 | 15.4 | 1,290 | 9.7 | 9.8 | 19.9 |
| Moderate | 17 | 32.7 | 25.3 | 3,395 | 25.5 | 20.2 | 18.0 |
| Middle | 6 | 11.5 | 21.8 | 2,044 | 15.4 | 20.2 | 22.7 |
| Upper | 14 | 26.9 | 26.1 | 5,253 | 39.5 | 36.2 | 39.4 |
| Unknown | 5 | 9.6 | 11.5 | 1,315 | 9.9 | 13.7 | 0.0 |
| Total | 52 | 100.0 | 100.0 | 13,297 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 3 | 7.3 | 7.4 | 135 | 2.7 | 4.6 | 19.9 |
| Moderate | 12 | 29.3 | 19.9 | 1,028 | 20.7 | 13.8 | 18.0 |
| Middle | 5 | 12.2 | 25.5 | 435 | 8.8 | 20.9 | 22.7 |
| Upper | 19 | 46.3 | 43.9 | 2,155 | 43.4 | 56.0 | 39.4 |
| Unknown | 2 | 4.9 | 3.3 | 1,214 | 24.4 | 4.6 | 0.0 |
| Total | 41 | 100.0 | 100.0 | 4,967 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 32 | 12.7 | 11.5 | 3,787 | 5.7 | 6.7 | 19.9 |
| Moderate | 62 | 24.6 | 24.3 | 12,056 | 18.3 | 19.3 | 18.0 |
| Middle | 47 | 18.7 | 21.6 | 12,291 | 18.7 | 20.3 | 22.7 |
| Upper | 85 | 33.7 | 27.1 | 31,544 | 47.9 | 36.6 | 39.4 |
| Unknown | 26 | 10.3 | 15.5 | 6,205 | 9.4 | 17.1 | 0.0 |
| Total | 252 | 100.0 | 100.0 | 65,883 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | %% | %% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 8.7 | 0 | 0.0 | 5.4 | 19.9 |
| Moderate | 0 | 0.0 | 20.8 | 0 | 0.0 | 14.9 | 18.0 |
| Middle | 0 | 0.0 | 24.8 | 0 | 0.0 | 19.9 | 22.7 |
| Upper | 0 | 0.0 | 41.4 | 0 | 0.0 | 55.2 | 39.4 |
| Unknown | 0 | 0.0 | 4.3 | 0 | 0.0 | 4.6 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 5 | 23.8 | 11.4 | 376 | 19.6 | 6.0 | 19.9 |
| Moderate | 6 | 28.6 | 23.3 | 615 | 32.1 | 14.9 | 18.0 |
| Middle | 6 | 28.6 | 28.0 | 506 | 26.4 | 18.0 | 22.7 |
| Upper | 4 | 19.0 | 33.1 | 419 | 21.9 | 54.2 | 39.4 |
| Unknown | 0 | 0.0 | 4.1 | 0 | 0.0 | 7.0 | 0.0 |
| Total | 21 | 100.0 | 100.0 | 1,916 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 1.3 | 0 | 0.0 | 0.8 | 19.9 |
| Moderate | 0 | 0.0 | 0.4 | 0 | 0.0 | 0.6 | 18.0 |
| Middle | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.3 | 22.7 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 39.4 |
| Unknown | 0 | 0.0 | 98.0 | 0 | 0.0 | 98.4 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's HMDA lending to LMI borrowers was comparable to aggregate lenders' performance. The bank's HMDA lending to low-income borrowers for both years was below demographics. The bank's HMDA lending to moderate-income borrowers was comparable to demographics in 2021 and exceeded demographics in 2022. Based on 2021 FFIEC adjusted census data, 20.3% of families in the AA are low income and 17.2% are moderate income. This data for 2022 shows that 19.9% of families in the AA are low income and 18.0% are moderate income. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans as well as affordability factors. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, credit unions, regional banks, and large national banks.

Homes in the AA may be difficult for LMI borrowers to afford based on an assumption that a borrower can obtain a loan for approximately three times the borrower's annual income. Using the 2022 FFIEC

estimated median family income of \$117,800 for the Minneapolis-St. Paul MSA, an individual with the highest income in the low-income bracket (\$58,899) could afford a \$176,697 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket (\$94,239) could afford a \$282,717 home. According to 2022 FFIEC adjusted census data, the median housing value in the AA is \$272,560. A community contact and bank management noted an affordable housing shortage in the AA. Homes at an affordable price for lower-income individuals or families are limited and are quickly purchased, often by investors, when available. This information demonstrates that homeownership would likely be unaffordable for most low-income borrowers, as well as some moderate-income borrowers.

In this AA, the bank made use of flexible lending programs to help the credit needs of LMI borrowers. The bank participated in the Fannie Mae HomeReady program, USDA RD loan program, and MHFA Fix Up loan program, which help LMI borrowers achieve homeownership and improve their properties. The bank also used FHA and VA loan programs in the AA. During the evaluation period, the bank's use of these programs totaled approximately \$5.2 million in loans. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2020 HMDA lending performance was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following tables show the small business loan data by revenue and loan size for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 389 | 63.1 | 50.3 | 37,836 | 40.8 | 27.4 | 90.7 |
| Over \$1 Million | 196 | 31.8 | | 52,607 | 56.8 | | 8.3 |
| Revenue Unknown | 31 | 5.0 | | 2,199 | 2.4 | | 0.9 |
| Total | 616 | 100.0 | | 92,642 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 402 | 65.3 | 92.1 | 12,767 | 13.8 | 32.0 | |
| \$100,001 - \$250,000 | 104 | 16.9 | 4.0 | 18,921 | 20.4 | 16.0 | |
| \$250,001 - \$1 Million | 110 | 17.9 | 3.9 | 60,954 | 65.8 | 52.0 | |
| Total | 616 | 100.0 | 100.0 | 92,642 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 312 | 80.2 | | 7,917 | 20.9 | | |
| \$100,001 - \$250,000 | 35 | 9.0 | | 6,298 | 16.6 | | |
| \$250,001 - \$1 Million | 42 | 10.8 | | 23,621 | 62.4 | | |
| Total | 389 | 100.0 | | 37,836 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------|
| Minneapolis-St. Paul MSA AA | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 147 | 53.5 | 49.8 | 23,372 | 37.8 | 28.9 | 90.8 |
| Over \$1 Million | 119 | 43.3 | | 37,106 | 60.0 | | 8.2 |
| Revenue Unknown | 9 | 3.3 | | 1,318 | 2.1 | | 1.0 |
| Total | 275 | 100.0 | | 61,796 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 131 | 47.6 | 93.5 | 7,012 | 11.3 | 34.8 | |
| \$100,001 - \$250,000 | 64 | 23.3 | 3.1 | 12,277 | 19.9 | 14.4 | |
| \$250,001 - \$1 Million | 80 | 29.1 | 3.4 | 42,507 | 68.8 | 50.8 | |
| Total | 275 | 100.0 | 100.0 | 61,796 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 88 | 59.9 | | 4,082 | 17.5 | | |
| \$100,001 - \$250,000 | 34 | 23.1 | | 6,619 | 28.3 | | |
| \$250,001 - \$1 Million | 25 | 17.0 | | 12,671 | 54.2 | | |
| Total | 147 | 100.0 | | 23,372 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's lending to small businesses exceeded and was slightly above aggregate lenders' activity, respectively. According to 2021 and 2022 D&B data, 90.7% and 90.8% of businesses had gross annual revenues of \$1 million or less, respectively. The bank's and aggregate lenders' performance were below demographics. In 2021 and 2022, the bank made 80.2% and 59.9%, respectively, of its small business loans to small entities for \$100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with various creditors in this AA for small business loans, including several large national banks; many of these banks are large credit card issuers.

The bank made extensive use of the PPP loan program in 2020 and 2021. These loans were designed to help businesses keep their workforces employed during the pandemic. The bank originated over 860 business-related PPP loans in amounts of \$1 million or less, totaling over \$71.0 million in this AA.¹⁵ Of these PPP loans, over half were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and contributes to the bank's performance.

¹⁵ This PPP data excludes loans with a North American Classification System code indicating the business is in the agricultural sector; the excluded loans are discussed in the small farm loan borrower distribution section.

The bank also made extensive use of other SBA programs. During the evaluation period, the bank originated approximately \$26.3 million in loans through these programs.

The bank's 2020 small business lending performance was generally consistent with the bank's 2021 and 2022 small business lending performance.

Small Farm. The bank's lending to small farms of different sizes is excellent. The following tables show the bank's small farm lending by revenue and loan size for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 136 | 93.8 | 62.5 | 7,703 | 84.5 | 65.5 | 98.0 |
| Over \$1 Million | 5 | 3.4 | | 967 | 10.6 | | 1.8 |
| Revenue Unknown | 4 | 2.8 | | 441 | 4.8 | | 0.3 |
| Total | 145 | 100.0 | | 9,111 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 120 | 82.8 | 90.0 | 2,799 | 30.7 | 37.0 | |
| \$100,001 - \$250,000 | 14 | 9.7 | 5.7 | 2,329 | 25.6 | 23.7 | |
| \$250,001 - \$500,000 | 11 | 7.6 | 4.3 | 3,983 | 43.7 | 39.3 | |
| Total | 145 | 100.0 | 100.0 | 9,111 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 115 | 84.6 | | 2,614 | 33.9 | | |
| \$100,001 - \$250,000 | 12 | 8.8 | | 1,989 | 25.8 | | |
| \$250,001 - \$500,000 | 9 | 6.6 | | 3,100 | 40.2 | | |
| Total | 136 | 100.0 | | 7,703 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 58 | 86.6 | 64.4 | 8,042 | 85.3 | 74.4 | 98.1 |
| Over \$1 Million | 7 | 10.4 | | 1,322 | 14.0 | | 1.6 |
| Revenue Unknown | 2 | 3.0 | | 60 | 0.6 | | 0.3 |
| Total | 67 | 100.0 | | 9,424 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 35 | 52.2 | 87.6 | 1,926 | 20.4 | 31.1 | |
| \$100,001 - \$250,000 | 20 | 29.9 | 6.5 | 3,228 | 34.3 | 22.4 | |
| \$250,001 - \$500,000 | 12 | 17.9 | 5.9 | 4,270 | 45.3 | 46.5 | |
| Total | 67 | 100.0 | 100.0 | 9,424 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 31 | 53.4 | | 1,706 | 21.2 | | |
| \$100,001 - \$250,000 | 16 | 27.6 | | 2,566 | 31.9 | | |
| \$250,001 - \$500,000 | 11 | 19.0 | | 3,770 | 46.9 | | |
| Total | 58 | 100.0 | | 8,042 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's lending to small farms exceeded aggregate lenders' activity. According to 2021 and 2022 D&B data, 98.0% and 98.1% of farms in this AA had gross annual revenues of \$1 million or less, respectively. The bank's and aggregate lenders' performance were below demographics; the bank's lending compared more favorably to demographics than aggregate lenders. In 2021 and 2022, the bank made 84.6% and 53.4%, respectively, of its small farm loans to small entities for \$100,000 or less. This indicates a willingness to meet the credit needs of small farms that tend to request small-dollar loans. During the evaluation period, farmers' need for traditional loans was somewhat limited due to the availability of the PPP loans. The bank's competition for small farm loans primarily includes large national banks, as well as an agriculture-related finance company. The bank was a leading small farm lender by number volume in 2021 and 2022, according to CRA-reportable data.

The bank made extensive use of the PPP loan program in 2020 and 2021. The bank originated over 95 agriculture-related PPP loans in amounts of \$1 million or less, totaling over \$1.9 million in this AA.¹⁶ Of these PPP loans, over half were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small farms. The bank's PPP lending is highly responsive to small farm credit needs and contributes to the bank's performance.

¹⁶ This PPP data only includes loans with a North American Classification System code indicating the business is in the agricultural sector; the excluded loans are discussed in the small business loan borrower distribution section.

In addition to PPP loans, the bank also made use of the Farmer Mac loan programs. During the evaluation period, the bank originated approximately \$4.0 million in loans through these programs.

The bank's 2020 small farm lending performance was generally consistent with the bank's 2021 and 2022 small farm lending performance.

Geographic Distribution

Overall, the bank's geographic distribution and dispersion of the bank's HMDA, small business, and small farm loans in the AA is good and does not reveal any unexplained gaps in lending. As previously mentioned, the income classification of some census tracts, as well as the number of tracts in the AA, changed during the evaluation period. In 2020, this AA had 54 low-, 164 moderate-, 301 middle-, 184 upper-, and seven unknown-income census tracts. In 2021, this AA had 54 low-, 165 moderate-, 309 middle-, 185 upper-, and seven unknown-income census tracts. In 2022, this AA had 49 low-, 179 moderate-, 350 middle-, 218 upper-, and 11 unknown-income census tracts.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is good. The following tables show the distribution of the bank's 2021 and 2022 HMDA loans by census tract income level. The tables also include aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 9 | 5.8 | 3.7 | 1,523 | 3.6 | 2.5 | 2.3 |
| Moderate | 46 | 29.7 | 18.2 | 8,839 | 20.6 | 13.8 | 16.3 |
| Middle | 68 | 43.9 | 47.3 | 19,438 | 45.4 | 44.2 | 47.7 |
| Upper | 32 | 20.6 | 30.7 | 13,040 | 30.4 | 39.4 | 33.7 |
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.1 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 155 | 100.0 | 100.0 | 42,840 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 1 | 0.3 | 1.7 | 489 | 0.6 | 1.2 | 2.3 |
| Moderate | 66 | 19.0 | 13.1 | 11,188 | 12.9 | 9.7 | 16.3 |
| Middle | 185 | 53.2 | 47.1 | 43,669 | 50.3 | 42.5 | 47.7 |
| Upper | 96 | 27.6 | 38.1 | 31,431 | 36.2 | 46.6 | 33.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 348 | 100.0 | 100.0 | 86,777 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 1.5 | 0 | 0.0 | 1.3 | 2.3 |
| Moderate | 2 | 40.0 | 10.7 | 117 | 33.8 | 8.7 | 16.3 |
| Middle | 3 | 60.0 | 43.8 | 229 | 66.2 | 40.2 | 47.7 |
| Upper | 0 | 0.0 | 43.9 | 0 | 0.0 | 49.7 | 33.7 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|--|-----|-------|-------|---------|-------|-------|------------------------|
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.1 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 346 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 1 | 20.0 | 13.8 | 1,120 | 26.5 | 8.6 | 12.3 |
| Moderate | 2 | 40.0 | 32.2 | 2,227 | 52.7 | 23.9 | 31.1 |
| Middle | 2 | 40.0 | 36.4 | 880 | 20.8 | 41.0 | 39.9 |
| Upper | 0 | 0.0 | 16.3 | 0 | 0.0 | 23.4 | 15.4 |
| Unknown | 0 | 0.0 | 1.3 | 0 | 0.0 | 3.0 | 1.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 4,227 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 11 | 2.1 | 2.5 | 3,132 | 2.3 | 2.1 | 2.3 |
| Moderate | 116 | 22.4 | 14.9 | 22,371 | 16.6 | 12.1 | 16.3 |
| Middle | 261 | 50.5 | 47.0 | 64,760 | 48.0 | 43.0 | 47.7 |
| Upper | 129 | 25.0 | 35.5 | 44,705 | 33.1 | 42.5 | 33.7 |
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.2 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 517 | 100.0 | 100.0 | 134,968 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|------|-------|---------|------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.9 | 0 | 0.0 | 0.5 | 2.3 |
| Moderate | 0 | 0.0 | 9.2 | 0 | 0.0 | 6.2 | 16.3 |
| Middle | 0 | 0.0 | 42.1 | 0 | 0.0 | 35.8 | 47.7 |
| Upper | 0 | 0.0 | 47.7 | 0 | 0.0 | 57.2 | 33.7 |
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.3 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 3.4 | 0 | 0.0 | 2.2 | 2.3 |
| Moderate | 0 | 0.0 | 13.7 | 0 | 0.0 | 7.1 | 16.3 |
| Middle | 3 | 75.0 | 46.1 | 544 | 69.9 | 36.6 | 47.7 |
| Upper | 1 | 25.0 | 36.8 | 234 | 30.1 | 54.0 | 33.7 |
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.0 | 0.1 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|---|----------|--------------|--------------|------------|--------------|--------------|--------------|
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 4 | 100.0 | 100.0 | 778 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 6.0 | 0 | 0.0 | 5.8 | 2.3 |
| Moderate | 0 | 0.0 | 27.6 | 0 | 0.0 | 23.7 | 16.3 |
| Middle | 0 | 0.0 | 51.7 | 0 | 0.0 | 53.3 | 47.7 |
| Upper | 0 | 0.0 | 14.6 | 0 | 0.0 | 17.2 | 33.7 |
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.0 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 1.4 | 3.8 | 483 | 1.1 | 2.4 | 2.5 |
| Moderate | 23 | 16.7 | 20.2 | 5,453 | 11.9 | 14.6 | 17.1 |
| Middle | 73 | 52.9 | 46.1 | 20,938 | 45.8 | 42.8 | 48.5 |
| Upper | 40 | 29.0 | 29.8 | 18,829 | 41.2 | 39.9 | 31.8 |
| Unknown | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.2 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 138 | 100.0 | 100.0 | 45,703 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 2 | 3.8 | 2.5 | 286 | 2.2 | 1.7 | 2.5 |
| Moderate | 7 | 13.5 | 16.5 | 1,310 | 9.9 | 12.0 | 17.1 |
| Middle | 35 | 67.3 | 48.9 | 9,061 | 68.1 | 43.7 | 48.5 |
| Upper | 8 | 15.4 | 31.9 | 2,640 | 19.9 | 42.4 | 31.8 |
| Unknown | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.3 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 52 | 100.0 | 100.0 | 13,297 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 1 | 2.4 | 1.5 | 599 | 12.1 | 1.1 | 2.5 |
| Moderate | 4 | 9.8 | 11.8 | 399 | 8.0 | 8.7 | 17.1 |
| Middle | 23 | 56.1 | 46.4 | 2,290 | 46.1 | 40.1 | 48.5 |
| Upper | 13 | 31.7 | 40.3 | 1,679 | 33.8 | 50.1 | 31.8 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|------------------------|
| Unknown | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.1 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 41 | 100.0 | 100.0 | 4,967 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 1 | 25.0 | 11.9 | 50 | 1.1 | 5.1 | 10.3 |
| Moderate | 0 | 0.0 | 34.4 | 0 | 0.0 | 26.3 | 29.8 |
| Middle | 1 | 25.0 | 34.4 | 1,055 | 22.6 | 36.5 | 36.3 |
| Upper | 2 | 50.0 | 18.0 | 3,554 | 76.3 | 30.3 | 21.6 |
| Unknown | 0 | 0.0 | 1.4 | 0 | 0.0 | 1.8 | 2.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 4 | 100.0 | 100.0 | 4,659 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 6 | 2.3 | 3.2 | 1,418 | 2.0 | 2.5 | 2.5 |
| Moderate | 40 | 15.6 | 18.0 | 7,696 | 10.9 | 14.9 | 17.1 |
| Middle | 145 | 56.6 | 46.9 | 34,347 | 48.7 | 42.2 | 48.5 |
| Upper | 65 | 25.4 | 31.7 | 27,081 | 38.4 | 40.1 | 31.8 |
| Unknown | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.4 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 256 | 100.0 | 100.0 | 70,542 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|--|--------------------------|------|------|---------|------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 1.2 | 2.5 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 7.5 | 17.1 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 38.7 | 48.5 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 52.6 | 31.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 0.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 1.5 | 0 | 0.0 | 0.0 | 2.5 |
| Moderate | 6 | 28.6 | 14.9 | 534 | 27.9 | 0.0 | 17.1 |
| Middle | 13 | 61.9 | 52.4 | 1,003 | 52.3 | 0.0 | 48.5 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|----|-------|-------|-------|-------|-------|-------|
| Minneapolis-St. Paul MSA AA | | | | | | | |
| Upper | 2 | 9.5 | 31.2 | 379 | 19.8 | 0.0 | 31.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 21 | 100.0 | 100.0 | 1,916 | 100.0 | 0.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 5.4 | 0 | 0.0 | 0.0 | 2.5 |
| Moderate | 0 | 0.0 | 24.3 | 0 | 0.0 | 10.4 | 17.1 |
| Middle | 0 | 0.0 | 53.7 | 0 | 0.0 | 55.8 | 48.5 |
| Upper | 0 | 0.0 | 16.4 | 0 | 0.0 | 33.8 | 31.8 |
| Unknown | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.0 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's HMDA lending in the low-income tracts in 2021 and 2022, as well as in the moderate-income tracts in 2022, is comparable to aggregate lenders' performance and demographics. In 2021, the bank's lending in the moderate-income tracts exceeded aggregate lenders' performance and demographics. The bank made 2.1% and 2.3% of its HMDA loans in 2021 and 2022, respectively, in the low-income tracts. Demographics also show that 66.5% of the housing in the low-income tracts in 2021 and 62.3% in 2022 was rental. The bank made 22.4% and 15.6% of its HMDA loans in 2021 and 2022, respectively, in the moderate-income tracts. Demographics show that 43.8% of the housing in the moderate-income tracts in 2021 and 42.2% in 2022 was rental.

During these two years, the bank did not make HMDA loans in numerous tracts, including many LMI tracts. However, many of the LMI tracts are located somewhat centrally in the AA, in or near Minneapolis and St. Paul, where the bank's branch presence is minimal. The bank's AA is geographically large with significant urban areas. Numerous types of creditors operate throughout the AA and compete for lending opportunities. Despite these factors, the bank performed comparably to aggregate lenders and demographics, and in the instance mentioned above, exceeded aggregate lenders' activity and demographics.

The bank's 2020 HMDA lending performance in LMI tracts was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The geographic distribution of small business loans is good. The following tables show the bank's 2021 and 2022 small business loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 12 | 1.9 | 5.1 | 4,849 | 5.2 | 4.8 | 4.9 |
| Moderate | 162 | 26.3 | 17.3 | 20,445 | 22.1 | 18.5 | 17.6 |
| Middle | 293 | 47.6 | 43.9 | 42,474 | 45.8 | 46.6 | 45.4 |
| Upper | 149 | 24.2 | 33.1 | 24,874 | 26.8 | 29.8 | 31.8 |
| Unknown | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.2 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | |
| Total | 616 | 100.0 | 100.0 | 92,642 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 4 | 1.5 | 3.6 | 1,579 | 2.6 | 2.7 | 3.7 |
| Moderate | 39 | 14.2 | 17.2 | 9,391 | 15.2 | 17.7 | 17.9 |
| Middle | 167 | 60.7 | 43.3 | 37,325 | 60.4 | 42.6 | 44.0 |
| Upper | 65 | 23.6 | 34.8 | 13,501 | 21.8 | 36.2 | 33.6 |
| Unknown | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.8 | 0.8 |
| Tract-Unk | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | |
| Total | 275 | 100.0 | 100.0 | 61,796 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's small business lending in the low-income tracts was slightly below aggregate lenders' activity in 2021 and comparable in 2022. For the low-income tracts, the bank's performance was comparable to demographics for both years. The bank made 1.9% and 1.5% of its small business loans in 2021 and 2022, respectively, in the low-income tracts. Demographics show that 4.9% and 3.7% of the AA's businesses were in the low-income tracts in 2021 and 2022, respectively. The bank's small business lending in the moderate-income tracts exceeded aggregate lenders' performance and demographics in 2021 and was comparable to both in 2022. The bank made 26.3% and 14.2% of its small business loans in 2021 and 2022, respectively, in the moderate-income tracts. Demographics show that 17.6% and 17.9% of the AA's businesses were in the moderate-income tracts in 2021 and 2022, respectively.

Similar to its HMDA lending, during these two years, the bank did not make small business loans in numerous tracts, including many LMI tracts. As mentioned, many of the LMI tracts are located somewhat centrally in the AA, in or near Minneapolis and St. Paul, where the bank's branch presence is minimal. In addition, the bank competes with numerous creditors for small business lending opportunities in this large AA. Despite these factors, the bank performed comparably to aggregate lenders and demographics, and in the instance mentioned above, exceeded aggregate lenders' activity and demographics.

The bank's 2020 small business lending performance in LMI tracts was generally consistent with its 2021 and 2022 small business lending performance.

Small Farm. The geographic distribution of small farm loans is excellent. The following tables show the bank's distribution of 2021 and 2022 small farm loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Farm Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.8 | 1.0 |
| Moderate | 46 | 31.7 | 13.6 | 2,551 | 28.0 | 13.9 | 11.3 |
| Middle | 90 | 62.1 | 63.6 | 5,315 | 58.3 | 65.1 | 57.6 |
| Upper | 9 | 6.2 | 22.1 | 1,245 | 13.7 | 20.2 | 30.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.1 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 145 | 100.0 | 100.0 | 9,111 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Minneapolis-St. Paul MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | 0.8 |
| Moderate | 14 | 20.9 | 8.7 | 2,385 | 25.3 | 11.2 | 7.7 |
| Middle | 46 | 68.7 | 66.8 | 5,662 | 60.1 | 62.8 | 59.2 |
| Upper | 7 | 10.4 | 24.1 | 1,377 | 14.6 | 26.0 | 32.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.2 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 67 | 100.0 | 100.0 | 9,424 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank did not make small farm loans in the low-income tracts. Despite having no loans in these tracts, the bank's performance is considered comparable to aggregate lenders' activity and demographics. Aggregate lenders reported 0.7% and 0.3% of their loans in 2021 and 2022, respectively, in the low-income tracts. The bank's lack of small farm lending in these tracts is reasonable given the demographics of the low-income tracts. In 2021 and 2022, only 1.0% and 0.8% of the AA's farms were located in the low-income tracts. Very few farms are located in these tracts as most are urban.

The bank's small farm lending in the moderate-income tracts exceeded aggregate lenders' activity and demographics in 2021 and 2022. The bank made 31.7% and 20.9% of its small farm loans in 2021 and 2022, respectively, in the moderate-income tracts. Demographics show that 11.3% and 7.7% of the AA's farms were in the moderate-income tracts in 2021 and 2022, respectively. Aggregate lenders reported 13.6% and 8.7% of their loans in 2021 and 2022, respectively, in the moderate-income tracts.

The bank did not make small farm loans in many of the tracts in this AA. The bank's small farm lending generally occurred in the more rural areas of the AA, which include some moderate-income tracts. However, most of the moderate-income tracts are located in the urban areas of the AA where small farm loan demand would be extremely limited. In addition, the bank competes with several creditors for small farm lending opportunities in this AA. Given this context, the bank performed favorably against aggregate lenders and demographics.

The bank's 2020 small farm lending performance in LMI tracts was generally consistent with its 2021 and 2022 small farm lending performance.

Community Development Loans

The bank is a leader in making community development loans in the Minneapolis-St. Paul MSA AA. As shown in the table at right, the bank originated or renewed 101 community development loans totaling \$133.9 million. Just over one-third of the bank's community development loans in this AA are PPP loans, which demonstrates responsiveness to community needs during the pandemic. The bank made numerous loans that helped retain or create jobs for LMI individuals, as well as loans that supported the revitalization or stabilization of qualified areas. The bank also made loans financing affordable housing units, a significant need in the AA, as well as loans that help support the provision of community services to LMI individuals. The community development lending reflects excellent responsiveness to community needs.

| Community Development Loans in the Minneapolis-St. Paul MSA AA | | |
|---|-----------------|--------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 4 | 2,543,250 |
| Community Services | 6 | 4,281,076 |
| Economic Development | 58 | 105,909,343 |
| Revitalize or Stabilize | 33 | 21,186,817 |
| Total | 101 | 133,920,486 |

INVESTMENT TEST

The bank made a significant level of qualified investments, including donations, in the Minneapolis-St. Paul MSA AA.

The bank made a significant level of qualified investments. During the evaluation period, the bank purchased three bonds totaling approximately \$1.4 million. Two bonds support the revitalization or stabilization of moderate-income tracts, and one bond supports community services to LMI individuals. Of these three bonds, two financed improvements to school facilities and one financed city improvements in an area targeted for development. In addition, the bank also purchased an MBS pool, with

approximately \$1.4 million of the pool benefiting this AA. This MBS helps support the affordable housing needs in this AA. The bank also held eight prior period investments totaling \$3.4 million during the evaluation period. The prior period investments support affordable housing, revitalization or stabilization of qualified areas, and community services to LMI individuals.

Donations. The bank made a significant level of qualified investments in the form of donations. As shown in the table, the bank donated \$77,873 during the evaluation period primarily to organizations that provide community services to LMI individuals. The funds helped local organizations provide food, shelter, and other basic needs; provide financial awareness; support healthcare needs; and support education in the AA. The remaining donations supported revitalization or stabilization of qualified areas, which included the support of local schools, as well as economic development in the AA.

| Qualified Investment Donations in the Minneapolis-St. Paul MSA AA | | |
|--|-----------------|------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Community Service | 69 | 58,921 |
| Economic Development | 7 | 8,803 |
| Revitalize or Stabilize | 28 | 10,149 |
| Total | 104 | 77,873 |

SERVICE TEST

The bank's delivery systems are accessible to geographies and residents throughout the AA. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank is a leader in providing community development services.

Retail Services

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the AA and do not vary in a way that inconveniences LMI individuals or areas. The bank operates eight branches in the Minneapolis-St. Paul MSA AA. All branches have drive-up facilities, one branch has extended hours, and two branches have weekend hours. The bank also operates four cash-dispensing-only ATMs in the AA: three at branches and one at a retail location. As of 2022, two branches are in moderate-income tracts, five branches are in middle-income tracts, and one branch is in an upper-income tract. Prior to census tract income-level changes effective for 2022, four branches were located in moderate-income tracts in 2020 and 2021. In late 2020, the bank acquired a branch in Vadnais Heights, which is located in a tract designated as moderate income as of 2022 and was about a mile from a moderate-income tract from acquisition through 2021. This acquisition added a branch in Ramsey County where the bank did not have a presence. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the bank's geographic distribution of branches and drive-up facilities in the AA in 2022, as well as demographic data.

| 2022 Geographic Distribution of Branches Assessment Area: Minneapolis-St. Paul MSA | | | | | | | | | | | |
|---|----------------|---|--------|---------|------------|----------------|---------------|---------------|--------|------------|------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 49 | 6.1% | 5.1% | 3.7% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Moderate | Total | 2 | 25.0% | 0 | 0 | 2 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 179 | 22.2% | 21.2% | 17.7% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Middle | Total | 5 | 62.5% | 0 | 0 | 5 | 1 | 2 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 350 | 43.4% | 45.1% | 44.2% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Upper | Total | 1 | 12.5% | 0 | 0 | 1 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 218 | 27.0% | 27.9% | 33.6% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Unknown | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 11 | 1.4% | 0.6% | 0.8% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Totals | Total | 8 | 100.0% | 0 | 0 | 8 | 1 | 2 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 807 | 100.0% | 100.0% | 100.0% |
| | LS | 0 | | 0 | 0 | | | | | | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Community Development Services

The bank is a leader in providing community development services in the AA. During the evaluation period, 17 employees provided 52 services to 24 organizations. Bank employees typically served in leadership roles, such as board and committee members, while providing financial expertise to organizations. As shown in the table, the bank's services were primarily to organizations that provide community services to LMI individuals, support economic development, and help revitalize or stabilize qualified areas. The bank also served organizations with a focus on affordable housing. The bank's level and type of community development services show excellent responsiveness to community needs.

| Community Development Services in the Minneapolis-St. Paul MSA AA | |
|---|-----------|
| Purpose | # |
| Community Service | 17 |
| Economic Development | 16 |
| Affordable Housing | 3 |
| Revitalize or Stabilize | 16 |
| Total | 52 |

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DULUTH, MINNESOTA, MSA ASSESSMENT AREA

Bank Information. The bank operates six full-service branches, five in St. Louis County and one in Carlton County, in the Duluth MSA AA. The branches are located in Duluth, Hermantown, Virginia, Tower, Ely, and Cloquet. The bank opened the Hermantown branch during the evaluation period. All branches have drive-up facilities, except for the downtown Duluth location. Only one branch, Ely, has a cash-dispensing-only ATM. By number, the bank has 15.4% of its offices (including drive-up facilities) in this AA. Refer to the Service Test section for this AA and Institution section of the evaluation for more details on the bank's retail services.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank ranked sixth among 27 FDIC-insured institutions operating in the Duluth MN-WI MSA (Duluth MSA), with 5.0% market share and \$303.0 million in deposits. The deposits in these counties represent 12.3% of the bank's overall deposits. The bank competes with various types of financial institutions in this AA, including several community banks, regional banks, and large national banks. The bank also competes with credit unions not represented in the FDIC deposit market share information.

Assessment Area Information. The bank's Duluth MSA AA includes St. Louis County, Carlton County, and most of Lake County in Minnesota, as well as a portion of Douglas County in Wisconsin, which represents a significant portion of the Duluth MSA.¹⁷ The bank added most of Lake County to the AA in 2021, as well as St. Louis County unknown-income tract 9901.00 (which is a special water tract in a portion of Lake Superior) in 2022. In addition, during the evaluation period, the number of census tracts in the AA and income classifications of some tracts changed based on FFIEC adjusted census data. In 2020, the AA included eight low-, 17 moderate-, 41 middle-, and 16 upper-income tracts, for a total of 82 tracts. In 2021, the bank's AA consisted of eight low-, 18 moderate-, 43 middle-, and 16 upper-income tracts, for a total of 85 tracts. In 2022, the bank's AA consisted of three low-, 20 moderate-, 51 middle-, 20 upper-, and three unknown-income tracts, for a total of 97 tracts. The AA includes the Fond du Lac Reservation, as well as a portion of the Bois Forte Reservation. The AA is contiguous to and north of the bank's Pine City AA.

The following table shows the demographic characteristics of the AA based on the 2022 FFIEC adjusted census data and the 2022 D&B data.

¹⁷ The bank's AA includes Lake County except for one tract in a portion of Lake Superior.

| Combined Demographics Report 2022 Duluth MSA AA Demographics | | | | | | | | |
|---|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 3 | 3.1 | 1,033 | 1.5 | 390 | 37.8 | 12,746 | 18.9 |
| Moderate | 20 | 20.6 | 10,964 | 16.2 | 1,436 | 13.1 | 12,404 | 18.4 |
| Middle | 51 | 52.6 | 37,235 | 55.1 | 2,239 | 6.0 | 15,406 | 22.8 |
| Upper | 20 | 20.6 | 17,833 | 26.4 | 319 | 1.8 | 26,983 | 40.0 |
| Unknown | 3 | 3.1 | 474 | 0.7 | 217 | 45.8 | 0 | 0.0 |
| Total AA | 97 | 100.0 | 67,539 | 100.0 | 4,601 | 6.8 | 67,539 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 3,455 | 653 | 0.8 | 18.9 | 2,392 | 69.2 | 410 | 11.9 |
| Moderate | 24,416 | 13,003 | 15.6 | 53.3 | 9,217 | 37.7 | 2,196 | 9.0 |
| Middle | 81,679 | 47,638 | 57.0 | 58.3 | 15,521 | 19.0 | 18,520 | 22.7 |
| Upper | 29,504 | 22,048 | 26.4 | 74.7 | 4,303 | 14.6 | 3,153 | 10.7 |
| Unknown | 2,765 | 263 | 0.3 | 9.5 | 2,162 | 78.2 | 340 | 12.3 |
| Total AA | 141,819 | 83,605 | 100.0 | 59.0 | 33,595 | 23.7 | 24,619 | 17.4 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 684 | 5.7 | 573 | 5.3 | 107 | 10.7 | 4 | 1.8 |
| Moderate | 1,741 | 14.4 | 1,523 | 14.0 | 196 | 19.5 | 22 | 9.8 |
| Middle | 5,860 | 48.5 | 5,306 | 48.9 | 411 | 40.9 | 143 | 63.6 |
| Upper | 2,905 | 24.0 | 2,698 | 24.9 | 166 | 16.5 | 41 | 18.2 |
| Unknown | 894 | 7.4 | 755 | 7.0 | 124 | 12.4 | 15 | 6.7 |
| Total AA | 12,084 | 100.0 | 10,855 | 100.0 | 1,004 | 100.0 | 225 | 100.0 |
| Percentage of Total Businesses: | | | | 89.8 | | 8.3 | | 1.9 |

| Combined Demographics Report | | | | | | | | |
|--|----------------------|--------------|-------------------------------|--------------|------------------|--------------|----------------------|------------|
| 2022 Duluth MSA AA Demographics | | | | | | | | |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 2 | 0.8 | 2 | 0.9 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 12 | 5.1 | 11 | 4.7 | 1 | 25.0 | 0 | 0.0 |
| Middle | 175 | 73.8 | 172 | 73.8 | 3 | 75.0 | 0 | 0.0 |
| Upper | 45 | 19.0 | 45 | 19.3 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 3 | 1.3 | 3 | 1.3 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 237 | 100.0 | 233 | 100.0 | 4 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.3 | | 1.7 | | 0.0 |
| <i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i> | | | | | | | | |
| <i>Note: Percentages may not total 100.0 percent due to rounding.</i> | | | | | | | | |

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Duluth MSA for the year of loan origination. The table below shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

| Borrower Income Levels | | | | | | |
|---|-----------------|--------------|---------------------|----------------------|---------------------|--|
| Duluth, MN MSA | | | | | | |
| FFIEC Estimated Median Family Income | | Low | Moderate | Middle | Upper | |
| | | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above | |
| 2020 | \$72,700 | 0 - \$36,349 | \$36,350 - \$58,159 | \$58,160 - \$87,239 | \$87,240 - & above | |
| 2021 | \$74,700 | 0 - \$37,349 | \$37,350 - \$59,759 | \$59,760 - \$89,639 | \$89,640 - & above | |
| 2022 | \$88,200 | 0 - \$44,099 | \$44,100 - \$70,559 | \$70,560 - \$105,839 | \$105,840 - & above | |

For purposes of classifying census tracts by income level, this evaluation uses the FFIEC's adjusted census data median family income for the Duluth MSA, which was \$64,033 for 2020 and 2021 and \$77,796 for 2022.

Population. According to the 2022 FFIEC adjusted census data, the population of the AA is 274,636. St. Louis County has the highest percentage (72.9%) of the AA population. The largest age group of the AA population, 49.7%, is 25 to 64 years of age. The remaining age groups are as follows: 19.4% of residents are 17 years and younger, 18.9% of residents are 65 years and older, and 11.4% of residents are 18 to 24 years of age.

Housing Information. According to 2022 FFIEC adjusted census data, the AA has 141,819 housing units; 58.9% are owner-occupied, 23.7% are rental units, and 17.4% are vacant. The median age of the housing stock is 61 years, which is higher than the Minnesota statewide median age of 43 years. The median housing value is \$161,758, and the affordability ratio is 35.8, which is higher than the affordability ratio of 31.1 for the state of Minnesota. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. Therefore, housing in the AA is slightly more affordable than housing in the state.

Bank management and contacts noted that affordable housing is a significant need in the AA, specifically in the City of Duluth. Several factors contribute to affordable housing concerns, including low inventory, high construction costs and interest rates, and wages that have generally increased but remain insufficient to afford housing. Considerable apartment space is occupied by senior citizens and college students, leaving limited vacancy. Additionally, a contact explained that because of the area's topography, there is limited vacant land on which to build housing; the city is considering projects that would repurpose existing land parcels and buildings to provide more housing. A contact stated that there is a growing trend of residents moving away from the downtown Duluth area toward more rural parts of St. Louis County; this trend has resulted in increased home construction activity in those areas.

Housing availability and the path to homeownership continue to be challenges on the Fond du Lac Reservation. According to a contact, the homeownership rate is low for several reasons, including limited available land on which to build housing and lack of housing inventory, for example. There are many lakes and water bogs. The contact stated that most home purchases are funded through a federal program that is underutilized, as many people are not aware of the program while others are ineligible because their incomes are slightly above the threshold.

The table below shows the housing cost burden for renters and owners by geography and income level in the Duluth MSA, counties in the AA, and states of Minnesota and Wisconsin in 2022. As reflected in the table, renters and homeowners in the low-income bracket exceed HUD's 30% cost-burden threshold. The cost burden is more significant for low-income individuals. Homeowners generally fared better in the MSA, but low-income homeowners have a significant housing cost burden. Overall, the housing cost burden for low-income renters and homeowners, as well as moderate-income owners, in the MSA is below the burden for those in statewide Minnesota and Wisconsin.

| Housing Cost Burden | | | | | | |
|---|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area | Cost Burden - Renters | | | Cost Burden - Owners | | |
| | Low Income | Moderate Income | All Renters | Low Income | Moderate Income | All Owners |
| Duluth MSA | 65.8% | 27.8% | 42.4% | 56.0% | 23.5% | 16.3% |
| Carlton County, MN | 59.1% | 24.2% | 36.4% | 58.6% | 28.3% | 16.3% |
| Lake County, MN | 72.6% | 15.4% | 32.7% | 56.5% | 22.7% | 17.3% |
| St. Louis County, MN | 67.3% | 29.6% | 45.1% | 53.1% | 23.0% | 15.8% |
| Douglas County, WI | 61.0% | 23.9% | 35.4% | 68.0% | 22.4% | 18.0% |
| Minnesota | 71.3% | 25.6% | 40.7% | 59.4% | 26.7% | 16.7% |
| Wisconsin | 74.5% | 21.7% | 39.0% | 63.9% | 28.2% | 17.6% |
| <i>Cost Burden is housing cost that equals 30 percent or more of household income</i> | | | | | | |
| <i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i> | | | | | | |

General Economic and Business Information. According to community contacts and bank management, the local economy was generally stable during the evaluation period, though conditions vary based on the region. Prominent industries in the AA include healthcare, manufacturing, education, government, tourism, hospitality, mining, and transportation.

According to a contact, the economy on the Fond du Lac Reservation is still recovering from the pandemic, and there continues to be significant poverty on the reservation. Primary employers on the reservation include a casino and medical clinic.

Bank management and contacts noted a critical need for childcare in the AA. Management stated that changing childcare licensing standards have caused some providers to go out of business. Contacts noted a critical need for childcare in the City of Duluth and in St. Louis County. A contact stated that a lack of childcare on the Fond du Lac Reservation impacts the ability of some women to work.

The annual average unemployment rates in the Duluth MSA were generally comparable to the rates in the state of Minnesota and Wisconsin for all three years. The higher unemployment rates during 2020 were a result of the pandemic, but then the rates returned to lower levels. The following table provides annual average unemployment rates for the MSA, counties in the AA, and states of Minnesota and Wisconsin.

| Annual Average Unemployment Rates | | | |
|---|------|------|------|
| Area | 2020 | 2021 | 2022 |
| Duluth MSA | 7.6% | 4.3% | 3.5% |
| Carlton County, MN | 7.3% | 4.4% | 3.6% |
| Lake County, MN | 7.3% | 3.9% | 5.0% |
| St. Louis County, MN | 7.3% | 4.2% | 3.3% |
| Douglas County, WI | 9.2% | 4.5% | 4.1% |
| Minnesota | 6.3% | 3.8% | 2.7% |
| Wisconsin | 6.4% | 3.8% | 2.9% |
| <i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i> | | | |

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DULUTH, MINNESOTA, MSA ASSESSMENT AREA

The bank's Lending Test performance in the Duluth MSA AA is excellent. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses of different sizes. The geographic distribution of loans is good. The bank is a leader in making community development loans. The bank uses flexible loan programs. Examiners assigned equal weight to HMDA and small business loans given loan number volume during the evaluation period. Examiners did not review small farm loans because agricultural loans are not a major product for this AA, based on volume.

The Investment Test performance in the Duluth MSA AA is excellent. Overall, the bank made an excellent level of qualified investments, including donations, which shows excellent responsiveness to credit and community development needs.

Finally, under the Service Test, the bank's delivery systems are accessible to all portions of the AA and do not vary in a way that inconveniences certain individuals or areas. Additionally, the bank provides a relatively high level of community development services in the AA.

LENDING TEST

The bank's Lending Test performance in the Duluth MSA AA is excellent.

Lending Activity

The bank's lending activity reflects excellent responsiveness to AA credit needs. For HMDA loans, the bank ranked eighth among 378 lenders reporting HMDA loans in 2021, with 3.1% market share, and fourth among 328 lenders reporting HMDA loans in 2022, with 4.6% market share. For CRA loans, the bank ranked fourth among 87 lenders reporting CRA data in 2021, with 9.1% market share, and ranked sixth among 78 CRA reporters in 2022, with 5.9% market share. During the evaluation period, lending activity in this AA represented 17.8% by number and 19.6% by dollar amount of the bank's total lending. For the Minnesota AAs, the lending activity in the Duluth MSA AA represented 21.2% by number and 23.0% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2021 and 2022. The tables also include aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Duluth MSA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 14 | 8.3 | 10.4 | 1,226 | 3.8 | 5.5 | 20.1 |
| Moderate | 31 | 18.5 | 19.8 | 3,973 | 12.4 | 15.0 | 17.5 |
| Middle | 34 | 20.2 | 21.2 | 5,068 | 15.9 | 20.3 | 22.9 |
| Upper | 71 | 42.3 | 29.0 | 18,468 | 57.8 | 40.9 | 39.5 |
| Unknown | 18 | 10.7 | 19.5 | 3,210 | 10.0 | 18.2 | 0.0 |
| Total | 168 | 100.0 | 100.0 | 31,945 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 17 | 8.3 | 6.6 | 1,476 | 3.8 | 3.6 | 20.1 |
| Moderate | 28 | 13.6 | 16.5 | 3,607 | 9.4 | 12.0 | 17.5 |
| Middle | 54 | 26.2 | 24.1 | 7,828 | 20.4 | 21.0 | 22.9 |
| Upper | 99 | 48.1 | 36.7 | 23,790 | 62.0 | 45.4 | 39.5 |
| Unknown | 8 | 3.9 | 16.0 | 1,698 | 4.4 | 18.0 | 0.0 |
| Total | 206 | 100.0 | 100.0 | 38,399 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 1 | 25.0 | 10.6 | 130 | 25.9 | 5.5 | 20.1 |
| Moderate | 1 | 25.0 | 15.7 | 168 | 33.5 | 11.3 | 17.5 |
| Middle | 1 | 25.0 | 19.3 | 103 | 20.6 | 15.0 | 22.9 |
| Upper | 1 | 25.0 | 50.8 | 100 | 20.0 | 63.1 | 39.5 |
| Unknown | 0 | 0.0 | 3.5 | 0 | 0.0 | 5.0 | 0.0 |
| Total | 4 | 100.0 | 100.0 | 501 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 33 | 8.7 | 8.2 | 2,883 | 4.0 | 4.4 | 20.1 |
| Moderate | 60 | 15.8 | 17.7 | 7,748 | 10.9 | 13.3 | 17.5 |
| Middle | 89 | 23.4 | 22.6 | 12,999 | 18.2 | 20.5 | 22.9 |
| Upper | 172 | 45.3 | 33.9 | 42,738 | 60.0 | 43.6 | 39.5 |
| Unknown | 26 | 6.8 | 17.6 | 4,908 | 6.9 | 18.2 | 0.0 |
| Total | 380 | 100.0 | 100.0 | 71,276 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Duluth MSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 3.1 | 0 | 0.0 | 2.8 | 20.1 |
| Moderate | 0 | 0.0 | 15.6 | 0 | 0.0 | 11.0 | 17.5 |
| Middle | 0 | 0.0 | 20.3 | 0 | 0.0 | 15.2 | 22.9 |
| Upper | 0 | 0.0 | 56.3 | 0 | 0.0 | 69.0 | 39.5 |
| Unknown | 0 | 0.0 | 4.7 | 0 | 0.0 | 2.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 50.0 | 9.4 | 51 | 11.8 | 5.1 | 20.1 |
| Moderate | 0 | 0.0 | 17.5 | 0 | 0.0 | 11.3 | 17.5 |
| Middle | 0 | 0.0 | 23.8 | 0 | 0.0 | 17.6 | 22.9 |
| Upper | 1 | 50.0 | 45.7 | 380 | 88.2 | 61.3 | 39.5 |
| Unknown | 0 | 0.0 | 3.6 | 0 | 0.0 | 4.8 | 0.0 |
| Total | 2 | 100.0 | 100.0 | 431 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 1.0 | 0 | 0.0 | 1.1 | 20.1 |
| Moderate | 0 | 0.0 | 1.0 | 0 | 0.0 | 1.1 | 17.5 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.9 |
| Upper | 0 | 0.0 | 1.0 | 0 | 0.0 | 0.4 | 39.5 |
| Unknown | 0 | 0.0 | 97.1 | 0 | 0.0 | 97.4 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Duluth MSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 13 | 7.1 | 11.6 | 1,627 | 3.8 | 6.2 | 18.9 |
| Moderate | 38 | 20.7 | 22.7 | 5,873 | 13.7 | 17.6 | 18.4 |
| Middle | 33 | 17.9 | 19.7 | 6,563 | 15.3 | 19.5 | 22.8 |
| Upper | 81 | 44.0 | 26.9 | 25,241 | 58.8 | 39.5 | 40.0 |
| Unknown | 19 | 10.3 | 19.1 | 3,592 | 8.4 | 17.3 | 0.0 |
| Total | 184 | 100.0 | 100.0 | 42,896 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 7 | 9.0 | 11.9 | 452 | 2.3 | 7.1 | 18.9 |
| Moderate | 15 | 19.2 | 25.4 | 1,711 | 8.7 | 19.5 | 18.4 |
| Middle | 23 | 29.5 | 24.7 | 4,915 | 25.0 | 23.8 | 22.8 |
| Upper | 31 | 39.7 | 27.3 | 12,229 | 62.2 | 36.3 | 40.0 |
| Unknown | 2 | 2.6 | 10.7 | 368 | 1.9 | 13.4 | 0.0 |
| Total | 78 | 100.0 | 100.0 | 19,675 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 8 | 15.1 | 10.7 | 389 | 7.8 | 7.0 | 18.9 |
| Moderate | 4 | 7.5 | 18.8 | 255 | 5.1 | 12.6 | 18.4 |
| Middle | 7 | 13.2 | 25.2 | 488 | 9.8 | 23.5 | 22.8 |
| Upper | 30 | 56.6 | 41.7 | 3,549 | 71.5 | 53.3 | 40.0 |
| Unknown | 4 | 7.5 | 3.6 | 285 | 5.7 | 3.5 | 0.0 |
| Total | 53 | 100.0 | 100.0 | 4,966 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 28 | 8.5 | 11.4 | 2,468 | 3.5 | 6.4 | 18.9 |
| Moderate | 61 | 18.4 | 23.2 | 8,114 | 11.6 | 17.9 | 18.4 |
| Middle | 67 | 20.2 | 21.7 | 12,339 | 17.7 | 20.7 | 22.8 |
| Upper | 150 | 45.3 | 28.5 | 42,681 | 61.1 | 39.3 | 40.0 |
| Unknown | 25 | 7.6 | 15.3 | 4,245 | 6.1 | 15.7 | 0.0 |
| Total | 331 | 100.0 | 100.0 | 69,847 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Duluth MSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 5.5 | 0 | 0.0 | 3.5 | 18.9 |
| Moderate | 0 | 0.0 | 27.5 | 0 | 0.0 | 15.4 | 18.4 |
| Middle | 0 | 0.0 | 18.7 | 0 | 0.0 | 19.6 | 22.8 |
| Upper | 0 | 0.0 | 41.8 | 0 | 0.0 | 57.1 | 40.0 |
| Unknown | 0 | 0.0 | 6.6 | 0 | 0.0 | 4.4 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 8.6 | 0 | 0.0 | 7.0 | 18.9 |
| Moderate | 4 | 25.0 | 23.1 | 275 | 11.9 | 15.9 | 18.4 |
| Middle | 4 | 25.0 | 26.2 | 373 | 16.1 | 19.8 | 22.8 |
| Upper | 8 | 50.0 | 37.3 | 1,662 | 71.9 | 52.8 | 40.0 |
| Unknown | 0 | 0.0 | 4.7 | 0 | 0.0 | 4.4 | 0.0 |
| Total | 16 | 100.0 | 100.0 | 2,310 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 2.3 | 0 | 0.0 | 1.3 | 18.9 |
| Moderate | 0 | 0.0 | 2.3 | 0 | 0.0 | 3.1 | 18.4 |
| Middle | 0 | 0.0 | 2.3 | 0 | 0.0 | 3.0 | 22.8 |
| Upper | 0 | 0.0 | 2.3 | 0 | 0.0 | 0.7 | 40.0 |
| Unknown | 0 | 0.0 | 90.7 | 0 | 0.0 | 91.9 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's lending to low-income borrowers was consistent with aggregate lenders and below demographics. In 2021, the bank's lending to moderate-income borrowers was consistent with aggregate lenders and demographics, and in 2022, the bank's lending to moderate-income borrowers was below aggregate lenders and consistent with demographics. According to 2021 FFIEC adjusted census data, 20.1% and 17.5% of families in the AA were LMI, respectively, and in 2022, 18.9% and 18.4% of families in the AA were LMI, respectively. Although the bank trended below demographic data for low-income borrowers, its HMDA performance is good. Contacts stated that high interest rates have made it difficult for families to afford homes; this difficulty is presumably exacerbated for low-income families.

The bank made use of flexible lending programs, including VA, FHA, Fannie Mae HomeReady, Freddie Mac Home Possible, and USDA RD loan programs, as well as the FHLB's Home\$tart and AEOA's grant programs. During the evaluation period, the bank originated loans totaling approximately \$4.8 million

through these programs, which demonstrates its willingness to meet the credit needs of LMI borrowers. The bank also facilitated \$22,500 in grants. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2020 HMDA lending was generally consistent with its 2021 and 2022 HMDA lending.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following tables show the small business loan data by revenue and loan size for 2021 and 2022, as well as aggregate lending data and demographics.

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 270 | 67.3 | 53.2 | 24,469 | 45.7 | 38.9 | 89.9 |
| Over \$1 Million | 121 | 30.2 | | 27,532 | 51.4 | | 8.2 |
| Revenue Unknown | 10 | 2.5 | | 1,560 | 2.9 | | 1.9 |
| Total | 401 | 100.0 | | 53,561 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 266 | 66.3 | 92.3 | 10,191 | 19.0 | 32.6 | |
| \$100,001 - \$250,000 | 69 | 17.2 | 4.0 | 11,642 | 21.7 | 18.2 | |
| \$250,001 - \$1 Million | 66 | 16.5 | 3.6 | 31,728 | 59.2 | 49.2 | |
| Total | 401 | 100.0 | 100.0 | 53,561 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 211 | 78.1 | | 7,100 | 29.0 | | |
| \$100,001 - \$250,000 | 34 | 12.6 | | 5,647 | 23.1 | | |
| \$250,001 - \$1 Million | 25 | 9.3 | | 11,722 | 47.9 | | |
| Total | 270 | 100.0 | | 24,469 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Duluth MSA AA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 156 | 64.2 | 54.3 | 18,903 | 47.9 | 35.8 | 89.8 |
| Over \$1 Million | 74 | 30.5 | | 19,174 | 48.6 | | 8.3 |
| Revenue Unknown | 13 | 5.3 | | 1,353 | 3.4 | | 1.9 |
| Total | 243 | 100.0 | | 39,430 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 139 | 57.2 | 94.2 | 6,513 | 16.5 | 38.6 | |
| \$100,001 - \$250,000 | 61 | 25.1 | 2.9 | 10,198 | 25.9 | 15.0 | |
| \$250,001 - \$1 Million | 43 | 17.7 | 2.9 | 22,719 | 57.6 | 46.4 | |
| Total | 243 | 100.0 | 100.0 | 39,430 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 106 | 67.9 | | 4,898 | 25.9 | | |
| \$100,001 - \$250,000 | 31 | 19.9 | | 5,052 | 26.7 | | |
| \$250,001 - \$1 Million | 19 | 12.2 | | 8,953 | 47.4 | | |
| Total | 156 | 100.0 | | 18,903 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

For 2021 and 2022, the bank's lending to small businesses exceeded aggregate lenders and was below demographics. According to 2021 and 2022 D&B data, 89.9% and 89.8% of businesses in the AA had gross annual revenues of \$1 million or less, respectively. The bank originated 66.3% and 57.2% of its small business loans in amounts of \$100,000 or less in 2021 and 2022, respectively, which demonstrates the bank's willingness to lend to small businesses in the AA. Though the bank's performance is below demographics, it can be explained through performance context, namely competition in the AA for small business loans from other financial institutions. Additionally, several national banks reporting small business loans are well-known credit card lenders with significant lending activity in the AA.

In 2020 and 2021, the bank made extensive use of the PPP loan program; these loans were designed to help businesses keep their workforces employed during the pandemic. The bank originated approximately 500 PPP loans totaling around \$32.9 million in the Duluth MSA AA.¹⁸ Of these loans, more than half were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending contributes to the bank's performance.

¹⁸ This PPP data excludes loans with a North American Classification System code indicating the business is in the agricultural sector.

During the evaluation period, the bank also made use of other SBA programs totaling approximately \$13.1 million.

Lastly, the bank's 2020 small business lending was consistent with its 2021 and 2022 small business lending.

Geographic Distribution

The geographic distribution and dispersion of the bank's HMDA and small business loans in the Duluth MSA AA is good and does not reveal any unexplained gaps in lending. As previously mentioned, the income classification of some census tracts, as well as the number of tracts in the AA, changed during the evaluation period. In 2020, the AA included eight low-, 17 moderate-, 41 middle-, and 16 upper-income tracts, for a total of 82 tracts. In 2021, the AA consisted of eight low-, 18 moderate-, 43 middle-, and 16 upper-income tracts. In 2022, the AA consisted of three low-, 20 moderate-, 51 middle-, 20 upper-, and three unknown-income tracts.

Residential Real Estate. The bank's geographic distribution of HMDA loans is good. The tables below show the distribution of the bank's 2021 and 2022 HMDA loans by census tract income level. The tables also include aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 5 | 3.0 | 4.1 | 750 | 2.3 | 3.2 | 2.5 |
| Moderate | 37 | 22.0 | 16.6 | 4,350 | 13.6 | 10.9 | 14.1 |
| Middle | 97 | 57.7 | 55.3 | 17,981 | 56.3 | 52.2 | 58.2 |
| Upper | 29 | 17.3 | 24.0 | 8,864 | 27.7 | 33.7 | 25.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 168 | 100.0 | 100.0 | 31,945 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 4 | 1.9 | 2.7 | 700 | 1.8 | 2.0 | 2.5 |
| Moderate | 24 | 11.7 | 9.7 | 2,528 | 6.6 | 6.3 | 14.1 |
| Middle | 128 | 62.1 | 55.2 | 22,623 | 58.9 | 52.2 | 58.2 |
| Upper | 50 | 24.3 | 32.4 | 12,548 | 32.7 | 39.4 | 25.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 206 | 100.0 | 100.0 | 38,399 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 4.7 | 0 | 0.0 | 3.3 | 2.5 |
| Moderate | 0 | 0.0 | 8.3 | 0 | 0.0 | 5.7 | 14.1 |
| Middle | 2 | 50.0 | 48.0 | 230 | 45.9 | 45.2 | 58.2 |
| Upper | 2 | 50.0 | 39.0 | 271 | 54.1 | 45.7 | 25.2 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 4 | 100.0 | 100.0 | 501 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 3 | 21.4 | 31.3 | 3,298 | 28.8 | 18.9 | 19.4 |
| Moderate | 2 | 14.3 | 26.0 | 1,415 | 12.3 | 35.8 | 29.7 |
| Middle | 6 | 42.9 | 32.3 | 3,182 | 27.7 | 22.9 | 35.7 |
| Upper | 3 | 21.4 | 10.4 | 3,573 | 31.2 | 22.4 | 15.3 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 14 | 100.0 | 100.0 | 11,468 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 12 | 3.0 | 3.6 | 4,748 | 5.7 | 3.2 | 2.5 |
| Moderate | 64 | 16.2 | 12.6 | 8,344 | 10.1 | 9.4 | 14.1 |
| Middle | 233 | 59.1 | 54.7 | 44,016 | 53.2 | 51.0 | 58.2 |
| Upper | 85 | 21.6 | 29.1 | 25,636 | 31.0 | 36.4 | 25.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 394 | 100.0 | 100.0 | 82,744 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 2.5 |
| Moderate | 0 | 0.0 | 3.1 | 0 | 0.0 | 1.6 | 14.1 |
| Middle | 0 | 0.0 | 53.1 | 0 | 0.0 | 51.4 | 58.2 |
| Upper | 0 | 0.0 | 43.8 | 0 | 0.0 | 47.0 | 25.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 3.6 | 0 | 0.0 | 3.7 | 2.5 |
| Moderate | 1 | 50.0 | 12.1 | 51 | 11.8 | 9.2 | 14.1 |
| Middle | 0 | 0.0 | 46.2 | 0 | 0.0 | 49.6 | 58.2 |
| Upper | 1 | 50.0 | 38.1 | 380 | 88.2 | 37.4 | 25.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 2 | 100.0 | 100.0 | 431 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 6.8 | 0 | 0.0 | 5.7 | 2.5 |
| Moderate | 0 | 0.0 | 18.4 | 0 | 0.0 | 13.7 | 14.1 |
| Middle | 0 | 0.0 | 55.3 | 0 | 0.0 | 56.2 | 58.2 |
| Upper | 0 | 0.0 | 19.4 | 0 | 0.0 | 24.4 | 25.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Duluth MSA AA | | | | | | | |
|--|--------------------------|------|------|---------|------|------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 1.1 | 1.1 | 121 | 0.3 | 0.6 | 0.8 |
| Moderate | 20 | 10.9 | 20.5 | 3,419 | 8.0 | 13.6 | 15.6 |
| Middle | 122 | 66.3 | 53.6 | 26,262 | 61.2 | 51.6 | 57.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Duluth MSA AA | | | | | | | |
|--|-----|-------|-------|--------|-------|-------|------------------------|
| Upper | 37 | 20.1 | 24.5 | 11,982 | 27.9 | 33.8 | 26.4 |
| Unknown | 3 | 1.6 | 0.3 | 1,112 | 2.6 | 0.4 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 184 | 100.0 | 100.0 | 42,896 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 1 | 1.3 | 0.6 | 29 | 0.1 | 0.4 | 0.8 |
| Moderate | 2 | 2.6 | 13.3 | 157 | 0.8 | 9.4 | 15.6 |
| Middle | 64 | 82.1 | 57.0 | 14,771 | 75.1 | 54.3 | 57.0 |
| Upper | 11 | 14.1 | 28.8 | 4,718 | 24.0 | 35.6 | 26.4 |
| Unknown | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.3 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 78 | 100.0 | 100.0 | 19,675 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.4 | 0 | 0.0 | 0.5 | 0.8 |
| Moderate | 0 | 0.0 | 9.8 | 0 | 0.0 | 6.3 | 15.6 |
| Middle | 40 | 75.5 | 57.8 | 3,368 | 67.8 | 55.5 | 57.0 |
| Upper | 13 | 24.5 | 31.5 | 1,598 | 32.2 | 37.2 | 26.4 |
| Unknown | 0 | 0.0 | 0.4 | 0 | 0.0 | 0.4 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 53 | 100.0 | 100.0 | 4,966 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 1 | 20.0 | 8.2 | 2,050 | 56.3 | 2.2 | 7.9 |
| Moderate | 2 | 40.0 | 16.4 | 1,160 | 31.9 | 17.7 | 25.6 |
| Middle | 1 | 20.0 | 50.8 | 60 | 1.6 | 44.7 | 45.2 |
| Upper | 1 | 20.0 | 13.1 | 370 | 10.2 | 29.4 | 11.7 |
| Unknown | 0 | 0.0 | 11.5 | 0 | 0.0 | 6.1 | 9.6 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 3,640 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 4 | 1.2 | 0.9 | 2,200 | 3.0 | 0.8 | 0.8 |
| Moderate | 25 | 7.4 | 17.1 | 4,764 | 6.5 | 12.9 | 15.6 |
| Middle | 239 | 71.1 | 54.4 | 46,463 | 63.2 | 51.2 | 57.0 |
| Upper | 65 | 19.3 | 27.2 | 18,948 | 25.8 | 33.9 | 26.4 |
| Unknown | 3 | 0.9 | 0.4 | 1,112 | 1.5 | 1.2 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 336 | 100.0 | 100.0 | 73,487 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.8 |
| Moderate | 0 | 0.0 | 14.3 | 0 | 0.0 | 12.6 | 15.6 |
| Middle | 0 | 0.0 | 38.5 | 0 | 0.0 | 32.0 | 57.0 |
| Upper | 0 | 0.0 | 47.3 | 0 | 0.0 | 55.3 | 26.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.0 | 0.8 |
| Moderate | 1 | 6.3 | 9.2 | 28 | 1.2 | 5.6 | 15.6 |
| Middle | 12 | 75.0 | 49.3 | 2,002 | 86.7 | 53.0 | 57.0 |
| Upper | 3 | 18.8 | 41.2 | 280 | 12.1 | 41.3 | 26.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 16 | 100.0 | 100.0 | 2,310 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.8 |
| Moderate | 0 | 0.0 | 18.6 | 0 | 0.0 | 16.1 | 15.6 |
| Middle | 0 | 0.0 | 58.1 | 0 | 0.0 | 60.6 | 57.0 |
| Upper | 0 | 0.0 | 23.3 | 0 | 0.0 | 23.2 | 26.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.3 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

For 2021 and 2022, the bank's HMDA lending in low-income tracts was consistent with aggregate lenders and demographics. In 2021, the bank's HMDA lending in moderate-income tracts exceeded aggregate lenders and was consistent with demographics. In 2022, the bank's HMDA lending in moderate-income tracts was below aggregate lenders and demographics. In 2021, the bank did not make HMDA loans in one low-, nine moderate-, seven middle-, and two upper-income tracts in the AA. In 2022, the bank did not make HMDA loans in one low-, seven moderate-, eight middle-, two upper-, and one unknown-income tract in the AA. For both years, several of the LMI tracts with no HMDA loans were in or near downtown Duluth, which is largely industrial, or in rural areas of the AA.

Lastly, the bank's 2020 HMDA lending was generally consistent with its 2021 and 2022 HMDA lending.

Small Business. The bank's geographic distribution of small business loans is good. The tables below show the distribution of the bank's 2021 and 2022 small business loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 20 | 5.0 | 9.4 | 3,627 | 6.8 | 15.6 | 9.6 |
| Moderate | 83 | 20.7 | 19.8 | 9,922 | 18.5 | 20.9 | 21.2 |
| Middle | 200 | 49.9 | 45.8 | 27,156 | 50.7 | 42.4 | 48.6 |
| Upper | 98 | 24.4 | 24.7 | 12,856 | 24.0 | 21.1 | 20.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | |
| Total | 401 | 100.0 | 100.0 | 53,561 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Duluth MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 13 | 5.3 | 4.2 | 2,112 | 5.4 | 7.1 | 5.7 |
| Moderate | 9 | 3.7 | 13.4 | 989 | 2.5 | 14.4 | 14.4 |
| Middle | 154 | 63.4 | 47.3 | 23,675 | 60.0 | 43.7 | 48.5 |
| Upper | 58 | 23.9 | 28.0 | 10,435 | 26.5 | 27.7 | 24.0 |
| Unknown | 9 | 3.7 | 6.2 | 2,219 | 5.6 | 6.9 | 7.4 |
| Tract-Unk | 0 | 0.0 | 1.0 | 0 | 0.0 | 0.3 | |
| Total | 243 | 100.0 | 100.0 | 39,430 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021, the bank's small business lending in low-income tracts was below aggregate lenders and demographics, and its small business lending in moderate-income tracts is consistent with aggregate lenders and demographics. The bank made small business loans in a majority of its low-, moderate-, middle-, and upper-income tracts. The low-income tracts with no loans are in or near downtown Duluth, which is largely industrial in nature, and where the bank faces competition for small business loans from other financial institutions. Similarly, some of the moderate-income tracts with no loans are in downtown

Duluth. Additionally, several moderate-income tracts with no loans are in the northern, more rural portion of the AA, which are closer to other financial institutions' offices and where less demand exists for small business loans.

In 2022, the bank's lending in low-income tracts was consistent with aggregate lenders and demographics, and its lending in moderate-income tracts was below aggregate lenders and demographics. The bank made small business loans in all its low-income tracts and most of its middle- and upper-income tracts; for the same year, the bank made small business loans in five of its 20 moderate-income tracts and one of its three unknown-income tracts. Like in 2021, many of the moderate-income tracts with no small business loans are in or near downtown Duluth or in northern, rural areas of the AA.

Lastly, the bank's 2020 small business lending was generally consistent with its 2021 and 2022 small business lending.

Community Development Lending

The bank is a leader in making community development loans in the AA. During the evaluation period, the bank originated 86 community development loans totaling approximately \$78.0 million, as shown in the table on the right.

The bank's community development lending demonstrates excellent responsiveness to community needs. Most of the bank's community development lending dollars in this AA supported economic development. Notably, the bank also made 31 community development loans totaling approximately \$20.7 million that supported affordable housing and revitalization and stabilization efforts in the AA. Additionally, a significant number (33) of the bank's community development loans were PPP loans, which totaled approximately \$12.4 million.

| Community Development Lending in the Duluth MSA AA | | |
|---|-----------|-------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 7 | 6,197,051 |
| Community Service | 13 | 3,796,094 |
| Economic Development | 42 | 53,489,805 |
| Revitalize/Stabilize | 24 | 14,495,458 |
| Total | 86 | 77,978,408 |

INVESTMENT TEST

Overall, the bank made an excellent level of qualified investments, including donations, in the Duluth MSA AA, showing excellent responsiveness. The bank's level of qualified investments in the form of securities is significant. The bank purchased three new securities totaling \$1.7 million. Two investments helped to revitalize or stabilize LMI geographies by supporting school facilities in rural portions of the AA. The remaining supported affordable housing initiatives through the purchase of an MBS pool. During the evaluation period, the bank also had prior period investments totaling \$850,606 that helped revitalize moderate-income geographies.

Donations. The bank made an excellent level of qualified investments in the form of donations. The donations support organizations that provide community services to LMI residents, support affordable housing and economic development initiatives, and revitalize and stabilize LMI geographies. The bank's donations to organizations that helped to revitalize and stabilize LMI areas are noteworthy, namely a \$100,000 donation to an area school district.

| Qualified Investment Donations in the Duluth MSA AA | | |
|--|-----------|----------------|
| <i>Purpose</i> | # | \$ |
| Affordable Housing | 5 | 2,120 |
| Community Service | 41 | 23,410 |
| Economic Development | 2 | 2,000 |
| Revitalize/Stabilize | 39 | 111,465 |
| Total | 87 | 138,995 |

SERVICE TEST

The bank's delivery systems are accessible to geographies and individuals throughout the AA, and retail services do not vary in a way that inconveniences certain individuals or areas. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the AA are accessible to the bank's geographies and to individuals of different income levels. The bank operates six full-service branches in the Duluth MSA AA. As of 2022, three branches are in middle-income tracts and the remaining branches are in low-, upper-, and unknown-income tracts. The Duluth branch, in the unknown-income tract, is approximately a mile or less from three moderate-income tracts and one low-income tract. In 2022, the bank opened one full-service branch in Hermantown and discontinued Saturday hours at its Cloquet branch. All branches have drive-up facilities, except for the downtown Duluth location. One branch, Ely, has a cash-dispensing-only ATM. No branches have extended or weekend hours. Prior to 2022, three of the bank's five branches were in moderate-income tracts. The bank's services do not vary in a way that inconveniences certain individuals or areas. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the geographic distribution of branches in this AA as of December 31, 2022.

| 2022 Geographic Distribution of Branches Assessment Area: Duluth MSA | | | | | | | | | | | |
|---|----------------|----------|---------------|----------|------------|----------------|---------------|---------------|----|------------|------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 1 | 16.7% | 0 | 0 | 1 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 3 | 3.1% | 5.6% |
| | LS | 0 | | 0 | 0 | | | | | 2.6% | |
| Moderate | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 20 | 20.6% | 14.2% |
| | LS | 0 | | 0 | 0 | | | | | 19.0% | |
| Middle | Total | 3 | 50.0% | 0 | 0 | 3 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 51 | 52.6% | 49.0% |
| | LS | 0 | | 0 | 0 | | | | | 53.9% | |
| Upper | Total | 1 | 16.7% | 1 | 0 | 1 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 20 | 20.6% | 23.9% |
| | LS | 0 | | 0 | 0 | | | | | 22.5% | |
| Unknown | Total | 1 | 16.7% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 3 | 3.1% | 7.3% |
| | LS | 0 | | 0 | 0 | | | | | 2.1% | |
| <i>Totals</i> | Total | 6 | 100.0% | 1 | 0 | 5 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 97 | 100.0% | 100.0% |
| | LS | 0 | | 0 | 0 | | | | | 100.0% | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Community Development Services

The bank provided a relatively high level of community development services in the AA. During the evaluation period, six employees provided 14 services to nine organizations. In their roles as board and committee members, these employees provided financial expertise to organizations that provide affordable housing for or community services targeted to LMI persons, promote economic development, and help revitalize or stabilize LMI geographies. The bank's services addressed needs in the AA.

| Community Development Services in the Duluth MSA AA | |
|--|-----------|
| <i>Purpose</i> | # |
| Community Services | 3 |
| Affordable Housing | 1 |
| Economic Development | 8 |
| Revitalize or Stabilize | 2 |
| Total | 14 |

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEW ULM-MANKATO, MINNESOTA, CSA ASSESSMENT AREA

Bank Information. The bank operates two full-service branches and one limited-service office in the New Ulm-Mankato, Minnesota, CSA (New Ulm-Mankato CSA) AA. The full-service branches are in North Mankato and New Ulm. The limited-service office is in Mankato. Since the last evaluation, the bank closed three limited-service locations, one in New Ulm and two in North Mankato. The bank also relocated its North Mankato branch. All offices have drive-up facilities; one location has a cash-dispensing-only ATM. By number, the bank has 7.7% of its offices (including drive-up facilities) in this AA. Refer to the Service Test section for this AA and Institution section of the evaluation for more details on the bank's retail services.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank ranked second among 51 FDIC-insured institutions operating in the Mankato-New Ulm, MN CSA, with a 9.2% deposit market share and \$410.9 million in deposits. The deposits in this AA represent 9.2% of the bank's overall deposits. The bank competes with various types of financial institutions in this AA, including regional banks, large national banks, community banks, mortgage companies, and credit unions. Credit unions are not represented in the FDIC deposit market share information.

Assessment Area Information. The New Ulm-Mankato CSA AA is in south central Minnesota and consists of Nicollet and Blue Earth counties and all but one tract of Brown County. The Mankato, MN MSA includes Nicollet and Blue Earth counties. The New Ulm, MN Micropolitan Statistical Area includes Brown County. Together, these areas are defined as the Mankato-New Ulm, MN CSA. The bank has not changed the AA since the previous evaluation. However, during the evaluation period, the number of census tracts in the AA and income classifications of some tracts changed based on FFIEC adjusted census data. In 2020, this AA had four moderate-, 25 middle-, and two upper-income census tracts. In 2021, this AA had four moderate-, 24 middle-, and two upper-income tracts. In 2022, this AA had six moderate-, 21 middle-, and three upper-income tracts.

The following Combined Demographics Report provides demographic information for this AA, based on 2022 FFIEC adjusted census data and 2022 D&B data.

| Combined Demographics Report 2022 New Ulm-Mankato CSA AA | | | | | | | | |
|---|--------------------|-------|--------------------------|-------|--|------|---------------------------|-------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 5,853 | 19.6 |
| Moderate | 6 | 20.0 | 4,483 | 15.0 | 782 | 17.4 | 5,274 | 17.6 |
| Middle | 21 | 70.0 | 22,002 | 73.5 | 1,009 | 4.6 | 7,261 | 24.3 |
| Upper | 3 | 10.0 | 3,452 | 11.5 | 127 | 3.7 | 11,549 | 38.6 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 30 | 100.0 | 29,937 | 100.0 | 1,918 | 6.4 | 29,937 | 100.0 |

| Combined Demographics Report 2022 New Ulm-Mankato CSA AA | | | | | | | | |
|---|------------------------------|-----------------------|------------------------------------|--------------|------------------|--------------|-------------------------|--------------|
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 11,249 | 4,152 | 12.7 | 36.9 | 5,999 | 53.3 | 1,098 | 9.8 |
| Middle | 35,789 | 24,778 | 75.6 | 69.2 | 8,375 | 23.4 | 2,636 | 7.4 |
| Upper | 5,586 | 3,828 | 11.7 | 68.5 | 1,411 | 25.3 | 347 | 6.2 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 52,624 | 32,758 | 100.0 | 62.2 | 15,785 | 30.0 | 4,081 | 7.8 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 1,209 | 20.3 | 1,059 | 19.8 | 136 | 25.8 | 14 | 14.3 |
| Middle | 4,196 | 70.4 | 3,783 | 70.9 | 338 | 64.1 | 75 | 76.5 |
| Upper | 558 | 9.4 | 496 | 9.3 | 53 | 10.1 | 9 | 9.2 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 5,963 | 100.0 | 5,338 | 100.0 | 527 | 100.0 | 98 | 100.0 |
| Percentage of Total Businesses: | | | | 89.5 | | 8.8 | | 1.6 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 16 | 2.0 | 16 | 2.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 783 | 96.7 | 770 | 96.6 | 13 | 100.0 | 0 | 0.0 |
| Upper | 11 | 1.4 | 11 | 1.4 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 810 | 100.0 | 797 | 100.0 | 13 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.4 | | 1.6 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Mankato, MN MSA, as well as the estimated median family income for the nonmetropolitan areas of Minnesota, for the year of loan origination. The tables below show the estimated median family income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

| Borrower Income Levels | | | | | | |
|---|-----------------|--------------|---------------------|----------------------|---------------------|--|
| Mankato, MN MSA | | | | | | |
| FFIEC Estimated Median Family Income | | Low | Moderate | Middle | Upper | |
| | | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above | |
| 2020 | \$86,200 | 0 - \$43,099 | \$43,100 - \$68,959 | \$68,960 - \$103,439 | \$103,440 - & above | |
| 2021 | \$80,300 | 0 - \$40,149 | \$40,150 - \$64,239 | \$64,240 - \$96,359 | \$96,360 - & above | |
| 2022 | \$94,900 | 0 - \$47,449 | \$47,450 - \$75,919 | \$75,920 - \$113,879 | \$113,880 - & above | |

| Borrower Income Levels | | | | | | |
|---|-----------------|--------------|---------------------|----------------------|---------------------|--|
| Nonmetropolitan Areas of Minnesota | | | | | | |
| FFIEC Estimated Median Family Income | | Low | Moderate | Middle | Upper | |
| | | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above | |
| 2020 | \$70,900 | 0 - \$35,449 | \$35,450 - \$56,719 | \$56,720 - \$85,079 | \$85,080 - & above | |
| 2021 | \$72,400 | 0 - \$36,199 | \$36,200 - \$57,919 | \$57,920 - \$86,879 | \$86,880 - & above | |
| 2022 | \$83,600 | 0 - \$41,799 | \$41,800 - \$66,879 | \$66,880 - \$100,319 | \$100,320 - & above | |

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Mankato, MN MSA, which was \$71,814 for 2020 and 2021, and \$83,590 for 2022. This evaluation also uses the FFIEC's adjusted census data median family income for the nonmetropolitan areas of Minnesota, which was \$63,045 for 2020 and 2021, and \$74,737 for 2022.

Population. According to 2022 FFIEC adjusted census data, the AA population is 126,375. Blue Earth County represents 54.7% of the AA's population. Most people in the AA (45.7%) are between the ages of 25 to 64 years, according to the adjusted census data. The remaining population is as follows: 20.2% is 17 years and younger, 16.8% is 18 to 24 years, and 15.2% is 65 years and over.

Housing Information. According to 2022 FFIEC adjusted census data, this AA has 52,624 housing units: 62.3% are owner-occupied, 30.0% are rental units, and 7.8% are vacant. The median age of the housing stock is 52 years, which is higher than the Minnesota statewide median age of 43 years. The AA's median housing value is \$185,598, which is lower than \$235,700 for the state of Minnesota. The AA's affordability ratio is 33.8, which is comparable to the affordability ratio of 31.1 for the state. The

affordability ratio is the median household income divided by the median housing value; a higher ratio indicates greater affordability.

Bank management and community contacts noted a shortage of affordable housing in the AA. The area has a limited inventory of homes for sale. Since the onset of the pandemic, home prices increased significantly and remain high in most areas. The housing market is competitive, and homes sell quickly. Bank management noted an increase in apartment construction in Mankato and demand exists for those units. A contact stated that the area has had limited construction of affordable single-family homes and a shortage of affordable apartments. According to a recent housing study discussed by a contact, the area has a high homeless population, which was noted as a top concern.

The table below shows the housing cost burden for renters and owners by geography and income level in the AA, the Mankato, MN MSA, counties in the AA, and state of Minnesota.¹⁹ As reflected in the table, renters and homeowners in the low-income bracket greatly exceed HUD's 30% cost-burden threshold for nearly all areas. Renters and homeowners in the moderate-income bracket fare much better than low-income renters and homeowners. Overall, the cost burden for renters and homeowners in the AA is generally comparable to the cost burden for those in statewide Minnesota, with the exception of renters and homeowners in Brown County, who have lower cost burden than other areas.

| Housing Cost Burden | | | | | | |
|---|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area | Cost Burden - Renters | | | Cost Burden - Owners | | |
| | Low Income | Moderate Income | All Renters | Low Income | Moderate Income | All Owners |
| New Ulm-Mankato CSA AA | 72.3% | 21.8% | 41.2% | 59.9% | 23.7% | 15.5% |
| Blue Earth County, MN | 76.5% | 21.5% | 44.2% | 65.5% | 27.5% | 17.2% |
| Brown County, MN | 59.1% | 18.4% | 33.4% | 39.8% | 17.9% | 10.8% |
| Nicollet County, MN | 69.1% | 25.2% | 37.8% | 66.9% | 23.5% | 16.9% |
| Mankato, MN MSA | 74.7% | 22.3% | 42.6% | 66.0% | 26.0% | 17.0% |
| Minnesota | 71.3% | 25.6% | 40.7% | 59.4% | 26.7% | 16.7% |
| <i>Cost Burden is housing cost that equals 30 percent or more of household income</i> | | | | | | |
| <i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i> | | | | | | |

General Economic and Business Information. According to bank management, the local economy is generally stable with growth in some areas. The AA has a generally diverse economy with a variety of key industries, such as health care, higher education, retail distribution, manufacturing, agriculture, and government (local, county, state, and federal). Mankato is a regional center with continued growth and is a retail hub. In the time since the onset of the pandemic, wages have increased, as well as demand and competition for employees. Major employers include Minnesota State University, Bethany Lutheran College, a large health care system, as well as local and federal government. Although jobs are available, entities are finding it challenging to fill positions. According to a contact, the area has a shortage of contractors and lacks certain skilled workers as some have aged out of the job field. The health care industry, including its workforce, was directly impacted by the pandemic. Additionally, many workers want to continue to work from home. Business costs and interest rates continue to increase, which is challenging for business owners. Some businesses owners have been hesitant to invest in needs, such as equipment, as they strive to make the best use of their spending.

¹⁹ The New Ulm-Mankato CSA AA row in the table includes county-level data for all counties in the bank's AA.

Agriculture is also a primary sector of the area's economy. During the evaluation period, commodity prices were strong, and government programs helped support operations. Local farmers had cash on hand and sought to purchase equipment and land. However, land prices increased over the evaluation period and remain high. Certain input costs, such as crop fertilizer, started to increase during 2022. Corn and soybeans are the primary crops in the area. Dairy operations, hog operations (mostly finishing barns), and a few cattle feeder operations are also located here.

The annual average unemployment rate for the AA was slightly lower than the rate for statewide Minnesota in 2020 and was relatively consistent with the rate for statewide Minnesota from 2021 to 2022. The annual average unemployment rates in 2020 were higher than 2021 and 2022 given the onset of the pandemic. The rates declined over 2021 and 2022 as typical business operations resumed. The following table provides the annual average unemployment rates for the AA, counties in the AA, the Mankato, MN MSA, and the state of Minnesota.

| Annual Average Unemployment Rates | | | |
|---|------|------|------|
| Area | 2020 | 2021 | 2022 |
| New Ulm-Mankato CSA AA | 5.2% | 3.3% | 2.3% |
| Blue Earth County, MN | 5.4% | 3.4% | 2.3% |
| Brown County, MN | 5.2% | 3.4% | 2.7% |
| Nicollet County, MN | 4.9% | 3.0% | 2.0% |
| Mankato, MN MSA | 5.3% | 3.3% | 2.2% |
| Minnesota | 6.3% | 3.8% | 2.7% |
| <i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i> | | | |

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW ULM-MANKATO, MINNESOTA, CSA ASSESSMENT AREA

The bank's Lending Test performance in the New Ulm-Mankato CSA AA is excellent. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The geographic distribution of loans is adequate. The bank is a leader in making community development loans. The bank uses flexible loan programs. Examiners assigned the most weight to HMDA and small business loans, followed small farm loans based on loan number volume during the evaluation period.

The Investment Test performance in this AA is adequate. The bank made an adequate level of qualified investments, including donations, which shows adequate responsiveness to credit and community development needs.

Under the Service Test, delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences certain individuals or areas. Further, the bank provides a relatively high level of community development services.

LENDING TEST

The bank's Lending Test performance in the New Ulm-Mankato CSA AA is excellent.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. For HMDA loans, the bank ranked ninth among 231 lenders in 2021, with 3.5% market share, and sixth among 211 lenders in 2022, with 4.5% market share. For small business and small farm loans, the bank ranked second among 66 lenders reporting CRA-reportable loans in 2021, with 13.3% market share. In 2022, the bank ranked fifth among 71 lenders reporting CRA-reportable loans, with 7.1% market share. During the evaluation period, lending activity in this AA represented 10.1% by number and 10.4% by dollar amount of the bank's total lending. Within the Minnesota AAs, the lending activity in the New Ulm-Mankato CSA AA was 12.0% by number and 12.2% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses and Farms

Overall, the bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 6.3 | 10.5 | 487 | 4.1 | 6.6 | 18.8 |
| Moderate | 9 | 14.3 | 28.1 | 1,200 | 10.1 | 22.3 | 17.8 |
| Middle | 14 | 22.2 | 22.1 | 2,665 | 22.4 | 22.2 | 23.7 |
| Upper | 26 | 41.3 | 25.3 | 6,129 | 51.4 | 35.0 | 39.7 |
| Unknown | 10 | 15.9 | 14.1 | 1,442 | 12.1 | 13.9 | 0.0 |
| Total | 63 | 100.0 | 100.0 | 11,923 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 4 | 3.5 | 7.0 | 500 | 2.5 | 4.1 | 18.8 |
| Moderate | 21 | 18.4 | 23.2 | 2,494 | 12.3 | 18.1 | 17.8 |
| Middle | 35 | 30.7 | 25.4 | 5,780 | 28.6 | 23.5 | 23.7 |
| Upper | 47 | 41.2 | 32.0 | 10,241 | 50.7 | 40.3 | 39.7 |
| Unknown | 7 | 6.1 | 12.5 | 1,204 | 6.0 | 14.0 | 0.0 |
| Total | 114 | 100.0 | 100.0 | 20,219 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 7.2 | 0 | 0.0 | 6.1 | 18.8 |
| Moderate | 0 | 0.0 | 8.4 | 0 | 0.0 | 11.6 | 17.8 |
| Middle | 5 | 62.5 | 22.9 | 206 | 47.2 | 15.4 | 23.7 |
| Upper | 3 | 37.5 | 39.8 | 230 | 52.8 | 42.3 | 39.7 |
| Unknown | 0 | 0.0 | 21.7 | 0 | 0.0 | 24.5 | 0.0 |
| Total | 8 | 100.0 | 100.0 | 436 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level New Ulm-Mankato CSA AA | | | | | | | |
|--|-----|-------|-------|--------|-------|-------|-------|
| Total Home Mortgage Loans | | | | | | | |
| Low | 8 | 4.2 | 8.3 | 987 | 3.0 | 5.2 | 18.8 |
| Moderate | 31 | 16.4 | 24.7 | 3,747 | 11.3 | 19.8 | 17.8 |
| Middle | 56 | 29.6 | 23.8 | 9,102 | 27.4 | 22.8 | 23.7 |
| Upper | 77 | 40.7 | 29.4 | 16,709 | 50.3 | 37.9 | 39.7 |
| Unknown | 17 | 9.0 | 13.8 | 2,646 | 8.0 | 14.4 | 0.0 |
| Total | 189 | 100.0 | 100.0 | 33,191 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 3.7 | 0 | 0.0 | 3.0 | 18.8 |
| Moderate | 0 | 0.0 | 14.8 | 0 | 0.0 | 10.3 | 17.8 |
| Middle | 0 | 0.0 | 29.6 | 0 | 0.0 | 39.0 | 23.7 |
| Upper | 0 | 0.0 | 48.1 | 0 | 0.0 | 44.6 | 39.7 |
| Unknown | 0 | 0.0 | 3.7 | 0 | 0.0 | 3.1 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 13.0 | 0 | 0.0 | 9.6 | 18.8 |
| Moderate | 1 | 25.0 | 32.6 | 53 | 8.6 | 25.5 | 17.8 |
| Middle | 2 | 50.0 | 21.7 | 451 | 73.6 | 19.1 | 23.7 |
| Upper | 1 | 25.0 | 30.4 | 109 | 17.8 | 44.4 | 39.7 |
| Unknown | 0 | 0.0 | 2.2 | 0 | 0.0 | 1.4 | 0.0 |
| Total | 4 | 100.0 | 100.0 | 613 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 18.8 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 17.8 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.7 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 39.7 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level New Ulm-Mankato CSA AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 6.3 | 12.4 | 384 | 2.5 | 7.3 | 19.6 |
| Moderate | 14 | 22.2 | 26.7 | 2,225 | 14.5 | 21.4 | 17.6 |
| Middle | 15 | 23.8 | 22.7 | 3,403 | 22.2 | 23.3 | 24.3 |
| Upper | 25 | 39.7 | 23.3 | 8,287 | 54.0 | 32.6 | 38.6 |
| Unknown | 5 | 7.9 | 14.8 | 1,036 | 6.8 | 15.5 | 0.0 |
| Total | 63 | 100.0 | 100.0 | 15,335 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 2 | 10.0 | 16.2 | 229 | 6.4 | 10.8 | 19.6 |
| Moderate | 6 | 30.0 | 26.3 | 601 | 16.7 | 21.9 | 17.6 |
| Middle | 4 | 20.0 | 24.7 | 578 | 16.1 | 24.9 | 24.3 |
| Upper | 6 | 30.0 | 23.5 | 1,820 | 50.6 | 31.8 | 38.6 |
| Unknown | 2 | 10.0 | 9.4 | 366 | 10.2 | 10.5 | 0.0 |
| Total | 20 | 100.0 | 100.0 | 3,594 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 1 | 4.3 | 6.7 | 350 | 22.4 | 8.5 | 19.6 |
| Moderate | 8 | 34.8 | 14.4 | 314 | 20.1 | 9.2 | 17.6 |
| Middle | 1 | 4.3 | 26.9 | 50 | 3.2 | 28.6 | 24.3 |
| Upper | 11 | 47.8 | 44.2 | 791 | 50.7 | 45.5 | 38.6 |
| Unknown | 2 | 8.7 | 7.7 | 55 | 3.5 | 8.2 | 0.0 |
| Total | 23 | 100.0 | 100.0 | 1,560 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 7.3 | 13.1 | 1,035 | 4.7 | 8.1 | 19.6 |
| Moderate | 32 | 26.0 | 25.7 | 3,378 | 15.3 | 21.2 | 17.6 |
| Middle | 26 | 21.1 | 23.4 | 4,354 | 19.7 | 23.6 | 24.3 |
| Upper | 47 | 38.2 | 24.7 | 11,875 | 53.7 | 32.9 | 38.6 |
| Unknown | 9 | 7.3 | 13.1 | 1,457 | 6.6 | 14.2 | 0.0 |
| Total | 123 | 100.0 | 100.0 | 22,099 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: New Ulm-Mankato, MN CSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 19.6 |
| Moderate | 0 | 0.0 | 19.4 | 0 | 0.0 | 16.0 | 17.6 |
| Middle | 0 | 0.0 | 11.1 | 0 | 0.0 | 5.1 | 24.3 |
| Upper | 0 | 0.0 | 61.1 | 0 | 0.0 | 75.1 | 38.6 |
| Unknown | 0 | 0.0 | 8.3 | 0 | 0.0 | 3.7 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 2 | 11.8 | 11.8 | 72 | 4.5 | 4.9 | 19.6 |
| Moderate | 4 | 23.5 | 17.6 | 238 | 14.8 | 13.1 | 17.6 |
| Middle | 6 | 35.3 | 35.3 | 323 | 20.1 | 32.3 | 24.3 |
| Upper | 5 | 29.4 | 33.3 | 977 | 60.7 | 45.5 | 38.6 |
| Unknown | 0 | 0.0 | 2.0 | 0 | 0.0 | 4.2 | 0.0 |
| Total | 17 | 100.0 | 100.0 | 1,610 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 6.3 | 0 | 0.0 | 6.0 | 19.6 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 17.6 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 24.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 38.6 |
| Unknown | 0 | 0.0 | 93.8 | 0 | 0.0 | 94.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's HMDA lending to low-income borrowers was below aggregate lenders' performance and demographics. The bank's HMDA lending to moderate-income borrowers was comparable to demographics in 2021 and exceeded demographics in 2022. The bank's HMDA lending to moderate-income borrowers was below aggregate lenders' performance in 2021 and comparable in 2022. Based on 2021 adjusted census data, 18.8% of families in the AA are low income and 17.8% are moderate income. Data for 2022 shows that 19.6% of families in the AA are low income and 17.6% are moderate income. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans as well as affordability factors. The bank competes with various types of institutions for these loans in the AA, including community banks, mortgage companies, credit unions, regional banks, and large national banks.

Homes in the AA may be difficult for LMI borrowers to afford based on an assumption that a borrower can obtain a loan for approximately three times the borrower's annual income. Using the 2022 FFIEC estimated median family income of \$94,900 for the Mankato, MN MSA, an individual with the highest income in the low-income bracket (\$47,449) could afford a \$142,347 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket (\$75,919) could afford a \$227,757 home. According to 2022 FFIEC adjusted census data, the median housing value in the AA is \$185,598; that value is slightly higher for the Mankato, MN MSA (\$198,134). Community contacts and bank management noted an affordable housing shortage in the AA. This information demonstrates that homeownership would likely be unaffordable for most low-income borrowers, as well as some moderate-income borrowers.

In this AA, the bank made use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in the Fannie Mae HomeReady program, USDA RD loan program, and MHFA Fix Up loan program, which help LMI borrowers achieve homeownership and improve their properties. The bank also participated in the City of New Ulm's Economic Development Authority's Homebuyer Assistance loan program. The bank also used FHA and VA loan programs in the AA. During the evaluation period, the bank's use of these programs totaled approximately \$2.4 million in loans and \$6,175 in grants. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2020 HMDA lending performance was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following tables show the small business loan data by revenue and loan size for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| New Ulm-Mankato CSA AA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 143 | 71.5 | 51.1 | 5,332 | 28.3 | 26.3 | 89.5 |
| Over \$1 Million | 50 | 25.0 | | 12,772 | 67.7 | | 8.9 |
| Revenue Unknown | 7 | 3.5 | | 760 | 4.0 | | 1.6 |
| Total | 200 | 100.0 | | 18,864 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 158 | 79.0 | 89.5 | 3,892 | 20.6 | 23.3 | |
| \$100,001 - \$250,000 | 20 | 10.0 | 4.3 | 3,627 | 19.2 | 14.4 | |
| \$250,001 - \$1 Million | 22 | 11.0 | 6.3 | 11,345 | 60.1 | 62.3 | |
| Total | 200 | 100.0 | 100.0 | 18,864 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 135 | 94.4 | | 2,569 | 48.2 | | |
| \$100,001 - \$250,000 | 3 | 2.1 | | 512 | 9.6 | | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|--|-----|-------|--|-------|-------|--|--|
| New Ulm-Mankato CSA AA | | | | | | | |
| \$250,001 - \$1 Million | 5 | 3.5 | | 2,251 | 42.2 | | |
| Total | 143 | 100.0 | | 5,332 | 100.0 | | |
| <i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i> | | | | | | | |
| <i>Note: Percentages may not total 100.0 percent due to rounding.</i> | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| New Ulm-Mankato CSA AA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 50 | 43.5 | 46.0 | 6,462 | 23.9 | 21.3 | 89.5 |
| Over \$1 Million | 57 | 49.6 | | 20,135 | 74.5 | | 8.8 |
| Revenue Unknown | 8 | 7.0 | | 423 | 1.6 | | 1.6 |
| Total | 115 | 100.0 | | 27,020 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 53 | 46.1 | 89.8 | 2,877 | 10.6 | 25.5 | |
| \$100,001 - \$250,000 | 32 | 27.8 | 4.5 | 5,972 | 22.1 | 15.3 | |
| \$250,001 - \$1 Million | 30 | 26.1 | 5.7 | 18,171 | 67.3 | 59.2 | |
| Total | 115 | 100.0 | 100.0 | 27,020 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 32 | 64.0 | | 1,587 | 24.6 | | |
| \$100,001 - \$250,000 | 13 | 26.0 | | 2,451 | 37.9 | | |
| \$250,001 - \$1 Million | 5 | 10.0 | | 2,424 | 37.5 | | |
| Total | 50 | 100.0 | | 6,462 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's lending to small businesses exceeded aggregate lenders' activity in 2021 and was comparable in 2022. For both years, the bank's and aggregate lenders' performance was below demographics. According to 2021 and 2022 D&B data, 89.5% of businesses had gross annual revenues of \$1 million or less. In 2021 and 2022, the bank made 94.4% and 64.0%, respectively, of its small business loans to small entities for \$100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with several creditors in this AA for small business loans, primarily large national banks; many of these banks are large credit card issuers.

The bank made extensive use of the PPP loan program in 2020 and 2021. These loans were designed to help businesses keep their workforces employed during the pandemic. The bank originated over 240 business-related PPP loans in amounts of \$1 million or less, totaling over \$16.0 million in this AA.²⁰ Of these PPP loans, over half were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

The bank also made use of other SBA programs. During the evaluation period, the bank originated approximately \$3.5 million in loans through these programs.

Lastly, the bank's 2020 small business lending performance was generally consistent with the bank's 2021 and 2022 small business lending performance.

Small Farm. The bank's lending to small farms of different sizes is excellent. The following tables show the bank's small farm lending by revenue and loan size for 2021 and 2022, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 106 | 93.0 | 43.7 | 7,049 | 86.2 | 54.1 | 98.4 |
| Over \$1 Million | 8 | 7.0 | | 1,128 | 13.8 | | 1.6 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 114 | 100.0 | | 8,177 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 86 | 75.4 | 84.5 | 2,397 | 29.3 | 34.2 | |
| \$100,001 - \$250,000 | 21 | 18.4 | 11.8 | 3,472 | 42.5 | 39.0 | |
| \$250,001 - \$500,000 | 7 | 6.1 | 3.7 | 2,308 | 28.2 | 26.8 | |
| Total | 114 | 100.0 | 100.0 | 8,177 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 83 | 78.3 | | 2,307 | 32.7 | | |
| \$100,001 - \$250,000 | 17 | 16.0 | | 2,734 | 38.8 | | |
| \$250,001 - \$500,000 | 6 | 5.7 | | 2,008 | 28.5 | | |
| Total | 106 | 100.0 | | 7,049 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

²⁰ This PPP data excludes loans with a North American Classification System code indicating the business is in the agricultural sector; the excluded loans are discussed in the small farm loan borrower distribution section.

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| New Ulm-Mankato CSA AA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 45 | 90.0 | 40.6 | 6,965 | 83.5 | 53.8 | 98.4 |
| Over \$1 Million | 4 | 8.0 | | 1,111 | 13.3 | | 1.6 |
| Revenue Unknown | 1 | 2.0 | | 263 | 3.2 | | 0.0 |
| Total | 50 | 100.0 | | 8,339 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 19 | 38.0 | 77.6 | 931 | 11.2 | 23.7 | |
| \$100,001 - \$250,000 | 21 | 42.0 | 14.5 | 3,619 | 43.4 | 35.2 | |
| \$250,001 - \$500,000 | 10 | 20.0 | 7.9 | 3,789 | 45.4 | 41.2 | |
| Total | 50 | 100.0 | 100.0 | 8,339 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 19 | 42.2 | | 931 | 13.4 | | |
| \$100,001 - \$250,000 | 19 | 42.2 | | 3,209 | 46.1 | | |
| \$250,001 - \$500,000 | 7 | 15.6 | | 2,825 | 40.6 | | |
| Total | 45 | 100.0 | | 6,965 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's lending to small farms exceeded aggregate lenders' activity. According to 2021 and 2022 D&B data, 98.4% of farms in this AA had gross annual revenues of \$1 million or less. The bank's and aggregate lenders' performance were below demographics; the bank's lending compared more favorably to demographics than aggregate lenders. In 2021 and 2022, the bank made 78.3% and 42.2%, respectively, of its small farm loans to small entities for \$100,000 or less. This indicates a willingness to meet the credit needs of small farms that tend to request small-dollar loans. The bank's competition for small farm loans includes some large national banks and a regional bank, as well as an agriculture-related finance company. The bank ranked second in small farm originations by number volume in 2021 and 2022, according to CRA-reportable data.

The bank made extensive use of the PPP loan program in 2020 and 2021. The bank originated over 65 agriculture-related PPP loans in amounts of \$1 million or less, totaling over \$1.5 million in this AA.²¹ Of these PPP loans, nearly all were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small farms. The bank's PPP lending is highly responsive to small farm credit needs and contributes to the bank's performance.

²¹ This PPP data only includes loans with a North American Classification System code indicating the business is in the agricultural sector; the excluded loans are discussed in the small business loan borrower distribution section.

In addition to PPP loans, the bank also made limited use of the Farmer Mac loan program and FSA loan program. During the evaluation period, the bank originated approximately \$1.1 million in loans through these programs.

The bank's 2020 small farm lending performance was generally consistent with the bank's 2021 and 2022 small farm lending performance.

Geographic Distribution

Overall, the bank's geographic distribution and dispersion of the bank's HMDA, small business, and small farm loans in the AA is adequate and does not reveal any unexplained gaps in lending. As previously mentioned, the income classification of some census tracts, as well as the number of tracts in the AA, changed during the evaluation period. In 2020, this AA had four moderate-, 25 middle-, and two upper-income census tracts. In 2021, this AA had four moderate-, 24 middle-, and two upper-income tracts. In 2022, this AA had six moderate-, 21 middle-, and three upper-income tracts. The AA did not include low-income tracts during the evaluation period.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is good. The following tables show the distribution of the bank's 2021 and 2022 HMDA loans by census tract income level. The tables also include aggregate lending and demographic data.

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 4 | 6.3 | 8.1 | 1,042 | 8.7 | 6.9 | 5.9 |
| Middle | 49 | 77.8 | 85.9 | 9,572 | 80.3 | 87.3 | 85.6 |
| Upper | 10 | 15.9 | 6.0 | 1,309 | 11.0 | 5.8 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 63 | 100.0 | 100.0 | 11,923 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 2.6 | 5.9 | 446 | 2.2 | 4.4 | 5.9 |
| Middle | 95 | 83.3 | 86.3 | 17,112 | 84.6 | 87.5 | 85.6 |
| Upper | 16 | 14.0 | 7.8 | 2,661 | 13.2 | 8.0 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 114 | 100.0 | 100.0 | 20,219 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 7.2 | 0 | 0.0 | 6.7 | 5.9 |
| Middle | 7 | 87.5 | 83.1 | 391 | 89.7 | 83.4 | 85.6 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|------------------------|
| Upper | 1 | 12.5 | 9.6 | 45 | 10.3 | 9.9 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 8 | 100.0 | 100.0 | 436 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 21.6 | 0 | 0.0 | 8.9 | 25.5 |
| Middle | 1 | 100.0 | 78.4 | 290 | 100.0 | 91.1 | 73.4 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 1.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 290 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 8 | 4.2 | 6.9 | 1,597 | 4.8 | 5.8 | 5.9 |
| Middle | 155 | 81.6 | 85.9 | 27,869 | 83.2 | 87.6 | 85.6 |
| Upper | 27 | 14.2 | 7.2 | 4,015 | 12.0 | 6.6 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 190 | 100.0 | 100.0 | 33,481 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|------|-------|---------|------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 5.9 |
| Middle | 0 | 0.0 | 85.2 | 0 | 0.0 | 88.2 | 85.6 |
| Upper | 0 | 0.0 | 14.8 | 0 | 0.0 | 11.8 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 25.0 | 13.0 | 109 | 17.8 | 7.7 | 5.9 |
| Middle | 3 | 75.0 | 82.6 | 504 | 82.2 | 91.3 | 85.6 |
| Upper | 0 | 0.0 | 4.3 | 0 | 0.0 | 1.0 | 8.4 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|---|-------|-------|-----|-------|-------|-------|
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 4 | 100.0 | 100.0 | 613 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 4.7 | 0 | 0.0 | 4.0 | 5.9 |
| Middle | 0 | 0.0 | 79.1 | 0 | 0.0 | 78.4 | 85.6 |
| Upper | 0 | 0.0 | 16.3 | 0 | 0.0 | 17.6 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 4 | 6.3 | 15.1 | 773 | 5.0 | 12.9 | 12.7 |
| Middle | 45 | 71.4 | 73.4 | 10,510 | 68.5 | 73.0 | 75.6 |
| Upper | 14 | 22.2 | 11.5 | 4,052 | 26.4 | 14.1 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 63 | 100.0 | 100.0 | 15,335 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 5.0 | 14.2 | 263 | 7.3 | 11.4 | 12.7 |
| Middle | 19 | 95.0 | 74.1 | 3,331 | 92.7 | 75.2 | 75.6 |
| Upper | 0 | 0.0 | 11.7 | 0 | 0.0 | 13.4 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 20 | 100.0 | 100.0 | 3,594 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 2 | 8.7 | 11.5 | 210 | 13.5 | 7.6 | 12.7 |
| Middle | 18 | 78.3 | 75.0 | 1,225 | 78.5 | 81.6 | 75.6 |
| Upper | 3 | 13.0 | 13.5 | 125 | 8.0 | 10.9 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|------------------------|
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 23 | 100.0 | 100.0 | 1,560 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 100.0 | 36.4 | 60 | 100.0 | 56.3 | 46.8 |
| Middle | 0 | 0.0 | 54.5 | 0 | 0.0 | 41.3 | 41.0 |
| Upper | 0 | 0.0 | 9.1 | 0 | 0.0 | 2.4 | 12.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 60 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 8 | 6.5 | 14.5 | 1,306 | 5.9 | 21.2 | 12.7 |
| Middle | 96 | 77.4 | 73.8 | 16,535 | 74.6 | 67.3 | 75.6 |
| Upper | 20 | 16.1 | 11.7 | 4,318 | 19.5 | 11.5 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 124 | 100.0 | 100.0 | 22,159 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|------|-------|---------|------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 12.7 |
| Middle | 0 | 0.0 | 86.1 | 0 | 0.0 | 89.8 | 75.6 |
| Upper | 0 | 0.0 | 13.9 | 0 | 0.0 | 10.2 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 5.9 | 0 | 0.0 | 5.9 | 12.7 |
| Middle | 14 | 82.4 | 86.3 | 1,469 | 91.2 | 90.0 | 75.6 |
| Upper | 3 | 17.6 | 7.8 | 141 | 8.8 | 4.1 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|----|-------|-------|-------|-------|-------|-------|
| Total | 17 | 100.0 | 100.0 | 1,610 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 6.3 | 0 | 0.0 | 5.0 | 12.7 |
| Middle | 0 | 0.0 | 68.8 | 0 | 0.0 | 55.4 | 75.6 |
| Upper | 0 | 0.0 | 25.0 | 0 | 0.0 | 39.5 | 11.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021, the bank's HMDA lending in the moderate-income tracts was comparable to demographics and aggregate lenders' activity. In 2022, the bank's HMDA lending in the moderate-income tracts was below demographics and below aggregate lenders' activity. The bank made 4.2% and 6.5% of its HMDA loans in 2021 and 2022, respectively, in the moderate-income tracts. Demographics show that 57.5% of the housing units in the moderate-income tracts in 2021 and 53.3% in 2022 were rental units. The moderate-income tracts are located in Mankato; those tracts include commercial, industrial, a university, and some housing. The presence of the university and significant rental housing likely limits HMDA loan demand.

Over 2021 and 2022, the bank made HMDA loans in nearly all tracts. The bank's AA is rural in many areas outside of New Ulm and Mankato. The bank also faces competition for HMDA loans in the AA. Given the performance context, the bank's HMDA lending is good.

The bank's 2020 HMDA lending performance in LMI tracts was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The geographic distribution of small business loans is adequate. The following tables show the bank's 2021 and 2022 small business loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Business Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|--|--------------------------|------|------|---------|------|------|--------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 19 | 9.5 | 16.9 | 2,374 | 12.6 | 21.8 | 15.0 |
| Middle | 165 | 82.5 | 77.5 | 14,885 | 78.9 | 75.5 | 79.0 |
| Upper | 16 | 8.0 | 5.0 | 1,605 | 8.5 | 2.6 | 6.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|-------|
| New Ulm-Mankato CSA AA | | | | | | | |
| Tract-Unk | 0 | 0.0 | 0.5 | 0 | 0.0 | 0.1 | |
| Total | 200 | 100.0 | 100.0 | 18,864 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| New Ulm-Mankato CSA AA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 15 | 13.0 | 20.5 | 2,607 | 9.6 | 23.9 | 20.3 |
| Middle | 75 | 65.2 | 69.4 | 15,156 | 56.1 | 60.4 | 70.4 |
| Upper | 25 | 21.7 | 9.4 | 9,257 | 34.3 | 15.5 | 9.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.1 | |
| Total | 115 | 100.0 | 100.0 | 27,020 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's small business lending in the moderate-income tracts was below aggregate lenders' activity and demographics in 2021 and 2022. The bank made 9.5% and 13.0% of its small business loans in 2021 and 2022, respectively, in the moderate-income tracts. Demographics show that 15.0% and 20.3% of the AA's small businesses were in the moderate-income tracts in 2021 and 2022, respectively. Over 2021 and 2022, the bank made small business loans in all tracts, with the exception of one middle-income tract in the northeast corner of the AA. Bank management noted strong competition from community banks in the area for loans.

The bank's 2020 small business lending performance in LMI tracts was generally consistent with its 2021 and 2022 small business lending performance.

Small Farm. The geographic distribution of small farm loans is adequate. The following tables show the bank's distribution of 2021 and 2022 small farm loans by census tract income level, as well as aggregate lending and demographic data.

| Distribution of 2021 Small Farm Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.0 | 0.9 |
| Middle | 110 | 96.5 | 90.3 | 8,092 | 99.0 | 97.2 | 90.8 |
| Upper | 4 | 3.5 | 9.5 | 85 | 1.0 | 2.8 | 8.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 114 | 100.0 | 100.0 | 8,177 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography New Ulm-Mankato CSA AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 1.0 | 0 | 0.0 | 0.2 | 2.0 |
| Middle | 49 | 98.0 | 97.7 | 8,039 | 96.4 | 98.3 | 96.7 |
| Upper | 1 | 2.0 | 1.0 | 300 | 3.6 | 1.5 | 1.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.0 | |
| Total | 50 | 100.0 | 100.0 | 8,339 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank did not make small farm loans in the moderate-income tracts. Despite having no loans in these tracts, the bank's performance is considered comparable to aggregate lenders' activity and demographics. Aggregate lenders reported 0.3% and 1.0% of their loans in 2021 and 2022, respectively, in the moderate-income tracts. The bank's lack of small farm lending in these tracts is reasonable given the demographics of the moderate-income tracts. In 2021 and 2022, only 0.9% and 2.0% of the AA's small farms were located in the moderate-income tracts. Very few farms are located in these tracts as the tracts are in Mankato and are not agricultural areas. The bank did not make loans in all tracts in the AA. However, the loans were reasonably dispersed based on where small farm loan demand likely occurs in the AA and the presence of strong competition.

The bank's 2020 small farm lending performance in LMI tracts was generally consistent with its 2021 and 2022 small farm lending performance.

Community Development Loans

The bank is a leader in making community development loans in the New Ulm-Mankato CSA AA. As shown in the table at right, the bank originated or renewed 31 community development loans totaling \$13.8 million. Approximately 74.2% of the bank's community development loans in this AA are PPP loans, which demonstrates responsiveness to community needs during the pandemic. Overall, the bank's loans primarily helped retain or create jobs for LMI individuals. The bank also made loans financing affordable housing, a stated need in the AA, as well as loans that help support the provision of community services to LMI individuals and the revitalization or stabilization of qualified areas. The community development lending reflects excellent responsiveness to community needs.

| Community Development Loans in the New Ulm-Mankato CSA AA | | |
|--|-----------|-------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 3 | 448,192 |
| Economic Development | 23 | 12,665,807 |
| Community Service | 1 | 623,155 |
| Revitalize or Stabilize | 4 | 80,929 |
| Total | 31 | 13,818,083 |

INVESTMENT TEST

Overall, the bank made an adequate level of qualified investments, including donations, in the New Ulm-Mankato CSA AA.

The bank made an adequate level of qualified investments. During the evaluation period, the bank purchased an MBS pool, with approximately \$139,479 of the pool benefiting this AA. This MBS helps support the affordable housing needs in this AA. The bank did not hold any prior period investments in this AA during the evaluation period.

Donations. The bank made an adequate level of qualified investments in the form of donations, which shows adequate responsiveness to AA needs. As shown in the table, the bank donated \$29,980 during the evaluation period primarily to organizations that provide community services to LMI individuals. The funds primarily helped local organizations meet basic needs for LMI individuals and families, including providing food and education, and supporting healthcare needs.

| Qualified Investment Donations in the New Ulm-Mankato CSA AA | | |
|---|-----------|---------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Community Service | 46 | 29,030 |
| Economic Development | 1 | 250 |
| Revitalize or Stabilize | 1 | 700 |
| Total | 48 | 29,980 |

SERVICE TEST

The bank's delivery systems are readily accessible to geographies and residents throughout the AA. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank provided a relatively high level of community development services.

Retail Services

The bank's delivery systems are readily accessible to the geographies and individuals of different income levels in the AA and do not vary in a way that inconveniences LMI individuals or areas. The bank operates two full-service branches, in North Mankato and New Ulm, and one limited-service office, in Mankato, in this AA. Since the last evaluation, the bank closed three limited-service locations, one in New Ulm and two in North Mankato. These locations were in middle-income tracts. The bank also removed a stand-alone cash-dispensing-only ATM. The bank also relocated its North Mankato branch to a nearby new location. All branches have drive-up facilities, two branches have extended hours, and three branches have weekend hours. As of 2022, the Mankato and North Mankato offices are in close proximity to multiple moderate-income tracts. Prior to census tract income-level changes effective for 2022, the offices were also in close proximity to the moderate-income tracts in 2020 and 2021. While the bank made changes to its branch network, the changes did not adversely affect LMI geographies or individuals given the locations of the closures and remaining offices. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the bank's geographic distribution of branches and drive-up facilities in the AA in 2022, as well as demographic data.²²

²² The bank's relocation of the North Mankato office at 245 Belgrade Avenue to the new full-service North Mankato branch location at 240 Belgrade Avenue is shown as a branch closure and a branch opening in the table; however, for analysis purposes, this change was appropriately considered as a relocation.

| 2022 Geographic Distribution of Branches New Ulm-Mankato, MN CSA AA | | | | | | | | | | | |
|--|----------------|----------|---------------|----------|------------|----------------|---------------|---------------|--------------|--------------|------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 0 | 0.0% | 0.0% | 0.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Moderate | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 6 | 20.0% | 20.9% | 18.1% |
| | DTO | 0 | | 0 | 0 | 0 | | | | | |
| | LS | 0 | | 0 | 0 | | | | | | |
| Middle | Total | 3 | 100.0% | 1 | 3 | 3 | 2 | 3 | | | |
| | DTO | 0 | | 0 | 1 | 0 | | 21 | 70.0% | 68.3% | 73.5% |
| | LS | 1 | | 0 | 1 | | | | | | |
| Upper | Total | 0 | 0.0% | 0 | 1 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 3 | 10.0% | 10.8% | 8.4% |
| | LS | 0 | | 0 | 1 | | | | | | |
| Unknown | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 0 | 0.0% | 0.0% | 0.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| <i>Totals</i> | Total | 3 | 100.0% | 1 | 4 | 3 | 2 | 3 | | | |
| | DTO | 0 | | 0 | 1 | 0 | | 30 | 100.0% | 100.0% | 100.0% |
| | LS | 1 | | 0 | 2 | | | | | | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals
LPOs not included in totals.

Community Development Services

The bank provided a relatively high level of community development services in the AA. During the evaluation period, five employees provided 14 services to seven organizations. Bank employees typically served in leadership roles, typically as board members, while providing financial expertise to organizations and also served as instructors for financial literacy courses. As shown in the table, the bank's services were to organizations that provide community services to LMI individuals and support economic development. The bank's level and type of community development services show good responsiveness to community needs.

| Community Development Services in the New Ulm-Mankato CSA AA | |
|---|-----------|
| <i>Purpose</i> | # |
| Community Service | 7 |
| Economic Development | 7 |
| Total | 14 |

METROPOLITAN AREA LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. CLOUD, MINNESOTA, MSA ASSESSMENT AREA

The bank operates one branch and one drive-up facility in this AA, which is comprised of Benton County in east-central Minnesota. Changes to the Minneapolis-St. Paul MSA AA resulted in the two AAs being adjacent starting in 2021. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. CLOUD, MINNESOTA, MSA ASSESSMENT AREA

Examiners determined the bank's lending²³ test performance and investment test performance in this AA are generally consistent with the performance in the full-scope MSA AAs of the state. The bank's service test performance in this AA is below the performance in the full-scope MSA AAs of the state primarily due to limited community development services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN METROPOLITAN AREAS OF MINNESOTA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for the AA. The Minnesota state section of the report also shows qualified investments in the form of donations and community development services for the AA. Conclusions regarding performance of the limited-scope AA, which did not affect the overall state rating, are shown in the table below.

| Performance in the Limited-Scope Review Metropolitan Minnesota Assessment Area | | | |
|---|---------------------|------------------------|---------------------|
| <i>AA</i> | <i>Lending Test</i> | <i>Investment Test</i> | <i>Service Test</i> |
| St. Cloud MSA | Consistent | Consistent | Below |

²³ Examiners did not include the bank's HMDA and small business loans in the analysis because they are not major business lines for this AA.

NONMETROPOLITAN STATEWIDE AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ADA, MINNESOTA, ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Norman County in northwestern Minnesota. The AA is adjacent to the bank's Grand Forks Multistate MSA AA. The bank did not open or close any branches in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ADA ASSESSMENT AREA

Examiners determined the bank's investment test performance is generally consistent with the overall state rating. The bank's lending²⁴ test performance and service test performance in this AA are below the overall state rating. The bank's lending test performance conclusion in this AA is primarily based on the geographic distribution of loans and the level of community development lending. The bank's service test performance conclusion in this AA is primarily based on limited community development services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BAXTER LAKES, MINNESOTA, ASSESSMENT AREA

The bank operates two branches in this AA that includes the entirety of Crow Wing County and part of Cass County in north-central Minnesota. The AA includes a small portion of the Mille Lacs Band of Ojibwe tribal land. The bank closed its Nisswa location in November 2022.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BAXTER LAKES ASSESSMENT AREA

Examiners determined the bank's lending²⁵ test performance and service test performance in this AA are below the overall state rating. The bank's investment test performance in this AA exceeds the overall state rating due to the level of new investments. The bank's lending test performance conclusion in this AA is primarily based on the borrower and geographic distribution of loans and level of community development loans. The service test performance conclusion in this AA is primarily based on limited community development services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRD ISLAND-FAIRFAX- HECTOR, MINNESOTA, ASSESSMENT AREA

The bank operates three branches in this AA that includes Renville County and part of Sibley County in south-central Minnesota. The AA is adjacent to the bank's New Ulm-Mankato CSA AA. The bank did not open or close any branches in this AA during the evaluation period.

²⁴ Examiners did not include the bank's HMDA and small business loans in the analysis because they are not major business lines for this AA.

²⁵ Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BIRD ISLAND-FAIRFAX-HECTOR ASSESSMENT AREA

Examiners determined the bank's lending²⁶ test performance and service test performance in this AA are generally consistent with the overall state rating. The bank's investment test performance in this AA exceeds the overall state performance due to the new investment and donation activity.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CLINTON, MINNESOTA, ASSESSMENT AREA

The bank operates one branch in this AA that includes Big Stone County and a part of Traverse County in western Minnesota. The bank added a tract in Traverse County to its AA in 2021. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CLINTON ASSESSMENT AREA

Examiners determined the bank's lending²⁷ test performance in this AA is generally consistent with the overall state rating. The bank's investment test performance in this AA exceeds the performance in the state due to the level of donations. The bank's service test performance in this AA is below the performance in the state due to limited community development services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LONSDALE/LONSDALE-GOODHUE, MINNESOTA, ASSESSMENT AREA

The bank operates five branches in this AA, which is comprised of Rice County; Goodhue County; and parts of Dodge, Olmsted, and Wabasha counties in southeastern Minnesota. The AA is adjacent to the bank's Minneapolis-St. Paul MSA AA. Prior to 2022, the AA consisted of only part of Rice County.²⁸ The bank added one office in Pine Island in September 2022, and two offices in Zumbrota in October 2022, when the bank merged with Bank of Zumbrota and Pine Island Bank. The AA includes sections of Prairie Island Indian Community land.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LONSDALE/LONSDALE-GOODHUE ASSESSMENT AREA

Examiners determined the bank's investment test performance in this AA is generally consistent with the overall state rating. The bank's lending test performance and service test performance in this AA are below the overall state rating. The bank's lending test performance conclusion in this AA is primarily based on lending activity and the geographic distribution of loans. The bank's service test performance conclusion in this AA is primarily based on limited community development services.

²⁶ Examiners did not include the bank's HMDA loans in the analysis because they are not a major business line for this AA.

²⁷ Examiners did not include the bank's HMDA loans in the analysis because they are not a major business line for this AA.

²⁸ At the last evaluation, the AA only included a portion of Rice County. The AA expanded to include the bank's new branches. For purposes of this evaluation, Lonsdale is the name of the AA before 2022, and Lonsdale-Goodhue is the name of the AA for 2022.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PINE CITY, MINNESOTA, ASSESSMENT AREA

The bank operates one branch in this AA that includes Pine and Kanabec counties in east-central Minnesota. The AA is adjacent to the bank's Minneapolis-St. Paul MSA AA. The branch was located in a moderate-income tract for a portion of the evaluation period until the tract income level designation changed to middle income due to census data updates for 2022. The AA includes small sections of the Mille Lacs Band of Ojibwe Reservation tribal land. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PINE CITY ASSESSMENT AREA

Examiners determined the bank's service test performance conclusion in this AA is generally consistent with the overall state rating. The bank's lending test performance in this AA is below the overall state rating due to the lending activity and geographic distribution of loans. The bank's investment test performance in this AA exceeds the performance in the state primarily due to the level of donations.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WARREN-OLSO, MINNESOTA, ASSESSMENT AREA

The bank operates two branches in this AA that is part of Marshall County in northwestern Minnesota. The AA is adjacent to the bank's Grand Forks Multistate MSA AA. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WARREN-OSLO ASSESSMENT AREA

Examiners determined the bank's investment test performance in this AA exceeds the overall state rating. The bank's lending²⁹ test performance and service test performance in this AA are below the overall state rating. The bank's lending test performance conclusion in this AA is primarily based on the level of community development loans. The bank's service test performance conclusion in this AA is primarily based on limited community development services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF MINNESOTA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The Minnesota state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited-scope AAs, which did not affect the overall state rating, are shown in the table below.

²⁹ Examiners did not include the bank's HMDA and small business loans in the analysis because they are not major business lines for this AA.

| Performance in the Limited-Scope Review Nonmetropolitan Minnesota Assessment Areas | | | |
|---|---------------------|------------------------|---------------------|
| <i>AA</i> | <i>Lending Test</i> | <i>Investment Test</i> | <i>Service Test</i> |
| Ada | Below | Consistent | Below |
| Baxter Lakes | Below | Exceeds | Below |
| Bird Island-Fairfax-Hector | Consistent | Exceeds | Consistent |
| Clinton | Consistent | Exceeds | Below |
| Lonsdale/Lonsdale-Goodhue | Below | Consistent | Below |
| Pine City | Below | Exceeds | Consistent |
| Warren-Oslo | Below | Exceeds | Below |

WISCONSIN

CRA RATING FOR Wisconsin: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Wisconsin AAs shows good responsiveness to local credit needs.
- Overall, the lending to businesses of different sizes and to LMI borrowers is excellent.
- Overall, the distribution of loans throughout the AAs is excellent.
- The bank is a leader in making community development loans.
- The bank makes use of flexible loan programs in its Wisconsin branches.
- Overall, by number and dollar amount, the bank has a significant level of qualified investments, including donations, which exhibit good responsiveness to credit and community development needs.
- Bank retail services are accessible to geographies and residents throughout the AAs. The bank also provides an adequate level of community development services in its Wisconsin AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Wisconsin is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Luck-Hayward nonmetropolitan AA.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted a limited-scope review for the Eau Claire MSA AA in Wisconsin. Examiners evaluated whether the bank's performance in the limited-scope metropolitan AA was consistent with its performance for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WISCONSIN

Assessment Area Information. The bank had two AAs, Luck-Hayward and Eau Claire MSA, in the state during the evaluation period. On October 17, 2020, because of the bank's acquisition of Peoples Bank Midwest, the bank expanded its existing AA to reflect the addition of the acquired Hayward branch. At that time, the bank also added the Eau Claire MSA AA given the presence of an acquired branch in Eau Claire. During the evaluation period, the number of census tracts in the AAs and income classifications of some tracts also changed based on FFIEC adjusted census data. The Luck-Hayward AA includes the Lac Courte Oreilles Reservation, as well as some tribal trust land for the St. Croix Chippewa Indians of Wisconsin and the Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank ranks 86th among 205 FDIC-insured institutions in Wisconsin, with less than 0.2% market share of the state's deposits. As of that same date, the bank has \$343.1 million in deposits in Wisconsin, which represent 13.9% of the bank's

total deposits. Four national banks have 50.5% of the deposit market share in the state. The bank operates in a competitive environment in its Wisconsin AAs. The AAs include various types of financial institutions, such as community, regional, and national banks. Credit unions also compete for deposits and loans in the bank's AAs. Credit union deposits are not included in the FDIC Deposit Market Share Report.

According to 2022 FFIEC adjusted census data, the 2022 Wisconsin AAs included 57 census tracts: six moderate-, 44 middle-, and seven upper-income tracts.³⁰ Various nonmetropolitan middle-income tracts in the Luck-Hayward AA were classified as underserved during the evaluation period and one tract was classified as distressed for a portion of the evaluation period.

Population. The total population represented in the bank's Wisconsin AAs is 204,142, or 3.5% of the state's population (5,893,718), according to 2022 FFIEC adjusted census data. Census data shows some population growth in all counties in the AAs over the evaluation period.

2022 FFIEC adjusted census data also shows that 73.6% of the households and 76.7% of the families in the Wisconsin AAs live in middle-income census tracts. Approximately 12.1% of households and 6.5% of families in the AAs are below the poverty level. Sawyer County has the highest percentages of households (14.8%) and families (11.9%) below the poverty level. In the Wisconsin AAs, 47.4% of residents are between the ages of 25 to 64 years old. The remaining age groups are as follows: 19.2% for residents 17 years and younger, 19.0% for residents 65 years and older, and 11.1% for residents aged 18 to 24 years.

General Economic and Housing Information. The bank's two Wisconsin AAs vary in economic and geographic composition. The Luck-Hayward AA is quite rural with many outdoor recreation opportunities. This AA has employment opportunities related to tourism, industrial and manufacturing, and healthcare, as well as government jobs (such as in the local school districts). Jobs are also available with the tribal government and entities through the Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin tribe and St. Croix Chippewa Indians of Wisconsin tribe. The Eau Claire MSA AA includes urban areas and more diversity in industries and employers. Eau Claire, Wisconsin, is a regional hub for goods and services and has industries such as higher education, retail, government, and healthcare. During the evaluation, the AAs fared reasonably well despite the onset of the COVID-19 pandemic.

Generally, the housing markets in the bank's Wisconsin AAs have had increased housing prices, increased building costs, and limited housing inventory, including affordable housing, over the evaluation period.

According to 2022 FFIEC adjusted census data, in the Wisconsin AAs, 50.9% of the housing was owner occupied, 20.0% was rental, and 29.1% was vacant. The percentage of vacant units in the AAs reflects the significant number of second homes located in the bank's Luck-Hayward AA. The median housing value was \$175,680 for the Wisconsin AAs. The highest median housing value was in Eau Claire County, at \$180,000. The lowest median housing values were in Burnett and Washburn counties, at \$163,200 and \$163,300, respectively. In the Wisconsin AAs, Eau Claire County had the oldest median housing stock age at 44 years. The median age of housing stock for the remaining counties in the Wisconsin AAs ranged from 37 to 40 years.

³⁰ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

In the Wisconsin AAs, the bank operates in competitive markets. Various types of financial institutions and creditors operate in the AAs, and as a result, the competition for loans, deposits, and community development activities is generally strong. Aside from the types of financial institutions noted above, the bank may also compete with other entities for loans, such as mortgage companies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

Examiners based the bank's Wisconsin evaluation on a full-scope review of the Luck-Hayward AA and a limited-scope review of the Eau Claire MSA AA. A detailed discussion of the bank's performance in the full-scope AA and a shorter discussion of the limited-review AA follow this section. For the limited-scope AA, Appendix D provides additional data regarding borrower and geographic distributions.

The overall CRA rating for Wisconsin is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests. The ratings below primarily reflect the bank's performance in the Luck-Hayward full-scope AA.

The Lending Test rating is outstanding. The bank's lending activity reflects good responsiveness to credit needs throughout the bank's Wisconsin AAs. The overall distribution of HMDA and small business loans by borrower income and revenue size is excellent. Overall, the geographic distribution of loans is also excellent. The bank is also a leader in making community development loans in its Wisconsin AAs. The bank used flexible loan programs to help meet credit needs.

The Investment Test rating is high satisfactory. Overall, the bank made a significant level of qualified investments, including donations, that show good responsiveness to credit and community development needs.

The Service Test rating is low satisfactory. Delivery systems are accessible to the geographies and to individuals of different income levels in the Wisconsin AAs. The bank provides an adequate level of community development services.

LENDING TEST

The Lending Test rating is outstanding for Wisconsin.

Lending Activity

The bank's lending levels reflect good responsiveness to credit needs in its Wisconsin AAs. The table below shows the bank's lending in its Wisconsin AAs by product type for the three-year evaluation period.

| Summary of Lending Activity in the Wisconsin AAs | | | | |
|--|-----------|-------|---------|-------|
| Loan Type | 2020–2022 | | | |
| | # | % | \$(000) | % |
| HMDA-reportable | 373 | 45.4 | 67,869 | 55.1 |
| Small Business-reportable | 414 | 50.4 | 54,043 | 43.9 |
| Small Farm-reportable | 35 | 4.3 | 1,246 | 1.0 |
| Total Loans | 822 | 100.0 | 123,158 | 100.0 |

The Wisconsin AAs account for 6.2% by number and by amount of the bank's lending activity during the evaluation period. Generally, the bank's HMDA lending volume (by number) was similar in 2020 and 2021. In 2022, the bank's HMDA lending volume declined slightly likely given the increasing interest rate environment. Generally, the bank's small business lending volume (by number) increased from 2020 to 2021 likely due to the addition of the Hayward and Eau Claire branches and the continued origination of PPP loans. In 2022, small business lending volume declined likely due to the cessation of the PPP loan program in 2021 as well as the increasing interest rate environment.

In its Wisconsin AAs, the bank was not among the leading lenders for HMDA-reportable loans. The bank was among the top five (in 2021) and six (in 2022) leading lenders for CRA-reportable loans in the Luck-Hayward AA but not in the Eau Claire MSA AA. Many institutions report CRA and HMDA data in the bank's Wisconsin AAs; both AAs have competitive banking environments given the presence of and access to many types of financial institutions and creditors.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. The bank extends loans to LMI borrowers and to small businesses throughout the Wisconsin AAs. In addition, the geographic distribution of loans is excellent. The bank extends loans throughout its AAs, including in moderate-income tracts.

During the evaluation period, the bank used flexible loan programs totaling approximately \$20.6 million in its Wisconsin AAs (primarily including PPP loans); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Luck-Hayward AA. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the Eau Claire MSA limited-scope AA.

Community Development Loans

The bank is a leader in making community development loans in its Wisconsin AAs. This conclusion primarily reflects the bank's performance in the full-scope AA. As shown in the table at right, the bank originated or renewed 30 community development loans totaling approximately \$27.8 million in its AAs.

| Wisconsin Community Development Loans | | |
|---------------------------------------|-----------|-------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 2 | 1,500,342 |
| Economic Development | 13 | 5,208,798 |
| Revitalize or Stabilize | 15 | 21,053,980 |
| Total | 30 | 27,763,120 |

The bank's community development lending benefited both Wisconsin AAs. By number, the bank had the most loans in the Luck-Hayward AA. By dollar, the bank's lending benefited the Luck-Hayward AA and the Eau Claire MSA AA almost equally. Many of the bank's community development loans were PPP loans. The bank's community development loan dollars primarily supported revitalization or stabilization in moderate-income tracts or underserved middle-income tracts. The remaining community development loan dollars supported economic development and affordable housing initiatives. Some of the bank's transactions, such as loans supporting healthcare in an underserved area and loans supporting construction or rehabilitation in areas designated for redevelopment, were particularly impactful. Overall, the bank's community development lending shows excellent responsiveness to AA needs.

Given this responsiveness, examiners can also consider any qualified community development loans benefiting geographies outside the bank's Wisconsin AAs. The bank originated five community development loans, totaling approximately \$5.5 million, outside the bank's Wisconsin AAs. These loans supported economic development and affordable housing initiatives. The table above does not include these loans.

INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for Wisconsin. This conclusion primarily reflects the bank's performance in the full-scope AA. Overall, the bank has a significant level of qualified investments in the form of securities and donations that show good responsiveness to credit and community development needs.

During the evaluation period, the bank made an adequate level of qualified investments. The bank made one new MBS pool investment that impacted the Luck-Hayward and Eau Claire MSA AAs. The investment promotes affordable housing, an identified need, with \$247,398 in the Luck-Hayward AA and \$492,760 in the Eau Claire MSA AA. The bank also has one prior-period investment for \$180,000 benefiting the Luck-Hayward AA.

Given this responsiveness, examiners can also consider any qualified community development investments benefiting geographies outside the bank's Wisconsin AAs. The bank made a \$521,963 investment that helps revitalize or stabilize an LMI area in a Wisconsin city outside the Wisconsin AAs. The bank also held 10 prior-period investments totaling \$2.0 million that benefit Wisconsin geographies outside of its AAs; some of these investments were redeemed, sold, or matured during the evaluation period.

Donations. The bank made an excellent level of donations during the evaluation period. Most donations, \$40,271, directly benefited the bank's Wisconsin AAs. Additional donations in the amount of \$15,000 benefited regional/statewide areas that include the bank's AAs. The following table shows the distribution of bank donations by AA, as well as at the regional/statewide level.

| Wisconsin Qualified Investment Donations | | |
|--|-----------|---------------|
| AA | Total | |
| | # | \$ |
| Luck-Hayward | 44 | 29,187 |
| Eau Claire MSA | 14 | 11,084 |
| Regional/Statewide Wisconsin | 25 | 15,000 |
| Total | 83 | 55,271 |

As seen in the table, the bank made donations in both Wisconsin AAs. By number and dollar, the bank made the most donations in the Luck-Hayward AA. Overall, most of the donations were made to organizations that provide community services, such as the provision of food and shelter, to LMI individuals. The bank made donations that helped support the provision of food to individuals in need during the pandemic, which was responsive to critical needs. The bank also made donations that promoted economic development and helped revitalize or stabilize certain areas. Overall, the bank's donations show excellent responsiveness to identified community needs.

Given this responsiveness, examiners can also consider any qualified community development donations benefiting geographies outside the bank's Wisconsin AAs. The bank made eight donations totaling \$2,740 to organizations providing community services to LMI individuals and promoted economic development. The table above does not include these donations.

SERVICE TEST

The Service Test rating is low satisfactory for Wisconsin. This conclusion primarily reflects the bank's performance in the Luck-Hayward full-scope AA. Delivery systems are accessible to the residents of the Wisconsin AAs. The hours of operation and retail services do not vary in a way that inconveniences certain individuals or areas. Finally, the bank provided an adequate level of community development services.

Retail Banking Services

The bank's delivery systems are accessible to residents and geographies throughout the bank's Wisconsin AAs. During most of the evaluation period, the bank operated three branches in the state. In October 2020, the bank acquired two new branches, in Hayward and Eau Claire, with the Peoples Bank Midwest merger. The bank did not close any branches in its Wisconsin AAs during the evaluation period.

All branches have drive-ups and two branches have ATMs. One branch offers extended weekday hours, and one branch offers weekend hours. The following table shows the bank's distribution of branches in 2022.

| Geographic Distribution of Branches State of Wisconsin 2022 | | | | | | | | | | | |
|--|----------------|----------|--------------|----------|------------|----------------|---------------|---------------|-------|------------|------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 0 | 0.0% | 0.0% | 0.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Moderate | Total | 1 | 33.3% | 0 | 0 | 1 | 1 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 6 | 10.5% | 11.8% | 12.2% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Middle | Total | 2 | 66.7% | 0 | 0 | 2 | 0 | 1 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 44 | 77.2% | 73.6% | 75.8% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Upper | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 7 | 12.3% | 14.6% | 11.9% |
| | LS | 0 | | 0 | 0 | | | | | | |

| | | | | | | | | | | | | |
|---------------|--------------|----------|---------------|----------|----------|----------|----------|----------|----|--------|--------|--------|
| Unknown | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 0 | 0.0% | 0.0% | 0.0% |
| | LS | 0 | | 0 | 0 | | | | | | | |
| <i>Totals</i> | Total | 3 | 100.0% | 0 | 0 | 3 | 1 | 1 | | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 57 | 100.0% | 100.0% | 100.0% |
| | LS | 0 | | 0 | 0 | | | | | | | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

As shown in the table, overall, the bank has 33.3% and 66.7% of its branches in moderate- and middle-income census tracts, respectively. The percentage of the bank's branches in moderate-income tracts exceed demographics, which show that 10.5% of census tracts in the Wisconsin AAs are moderate income. The Wisconsin branches represent 7.7% of the bank's offices (includes separate drive-up facilities).

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

The bank provides an adequate level of community development services in its Wisconsin AAs. This conclusion primarily reflects the bank's performance in its Luck-Hayward AA. The table below shows the distribution of community development services by type of activity and by AA or broader regional area including the bank's AAs.

| Wisconsin Community Development Services | | | | |
|--|---------------------------|-----------------------------|--------------------------------|--------------|
| <i>AA</i> | <i>Community Services</i> | <i>Economic Development</i> | <i>Revitalize or Stabilize</i> | <i>Total</i> |
| Luck-Hayward | 4 | 3 | 0 | 7 |
| Eau Claire MSA | 1 | 0 | 0 | 1 |
| Regional Wisconsin | 0 | 0 | 6 | 6 |
| Totals | 5 | 3 | 6 | 14 |

Bank employees primarily provided community development services in the Luck-Hayward AA and in a broader regional area including the bank's AAs. Several employees devoted time to providing financial expertise to organizations that support various community development initiatives. Employees primarily served in leadership roles as board members. One employee also assisted with grant writing and another employee served on a grant review committee. The bank's community development services benefited organizations that provide essential services to LMI individuals (such as shelter and elder care), promote economic development, and support revitalization and stabilization through the provision of healthcare in underserved areas. Employees provided services that were responsive to community needs.

Given this responsiveness, examiners can also consider any qualified community development services benefiting areas outside the bank's Wisconsin AAs. During the evaluation period, two employees served as board members for an economic development organization in an area adjacent to the Eau Claire MSA AA. The table above does not include these services.

NONMETROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LUCK-HAYWARD, WISCONSIN, ASSESSMENT AREA

Bank Information. In this AA, the bank operates two full-service branches, one in Luck in Polk County and one in Hayward in Sawyer County. Each branch has a drive-up facility and an ATM. The bank's Hayward office is new since the previous evaluation due to the bank's merger with Peoples Bank Midwest on October 17, 2020. The AA was also amended to reflect the new geographic footprint after the merger; this change is discussed below. By number, the bank has 5.1% of its offices (including drive-up facilities) in this AA. Refer to the Service Test section for this AA and Institution section of the evaluation for more details on the bank's retail services.

According to the June 30, 2022, FDIC Deposit Market Share Report, the bank ranks second among 20 FDIC-insured institutions operating in Bayfield, Burnett, Polk, Sawyer, and Washburn counties, with a 9.1% deposit market share and \$250.9 million in deposits. The deposits in these counties represent 10.2% of the bank's overall deposits. The bank competes with various types of financial institutions in this AA, including several community banks, regional banks, and large national banks. The bank also competes with credit unions not represented in the FDIC deposit market share information.

Assessment Area Information. The Luck-Hayward AA is in northwestern Wisconsin. The AA includes Burnett, Polk, Sawyer, and Washburn counties, as well as one census tract in Bayfield County.³¹ Due to the bank's merger with Peoples Bank Midwest in 2020, the bank amended the AA to include Washburn and Sawyer counties, as well as the tract in Bayfield County.

The AA is mostly rural with small communities and includes some forest land and numerous bodies of water (such as a portion of the St. Croix, Chippewa, and Flambeau rivers and many lakes). Sawyer County includes the Lac Courte Oreilles Reservation; parcels of reservation land are also located in Burnett and Washburn counties. Polk and Burnett counties include parcels of St. Croix Reservation land.

Census data changes also impacted the census tract composition of the AA during the evaluation period. In 2020, the Luck-Hayward AA included five moderate-income and 20 middle-income census tracts. In 2021, the AA included five moderate-income and 23 middle-income census tracts. In 2022, the AA included three moderate- and 31 middle-income tracts, as well as one upper-income tract. The following Combined Demographics Report table provides demographic information for this AA.³²

³¹ In 2020, the bank's two contiguous non-MSA Wisconsin AAs, Luck and Hayward, were combined. In 2021, the AA was changed to include all of Washburn County.

³² The FFIEC adjusted census data is based on decennial U.S. Census data and five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

| Combined Demographics Report | | | | | | | | |
|---------------------------------|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| 2022 Luck-Hayward, WI AA | | | | | | | | |
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 5,441 | 20.0 |
| Moderate | 3 | 8.6 | 1,968 | 7.2 | 239 | 12.1 | 5,229 | 19.2 |
| Middle | 31 | 88.6 | 24,370 | 89.5 | 1,827 | 7.5 | 6,270 | 23.0 |
| Upper | 1 | 2.9 | 886 | 3.3 | 60 | 6.8 | 10,284 | 37.8 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 35 | 100.0 | 27,224 | 100.0 | 2,126 | 7.8 | 27,224 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 6,257 | 2,531 | 7.6 | 40.5 | 600 | 9.6 | 3,126 | 50.0 |
| Middle | 65,346 | 29,729 | 89.1 | 45.5 | 7,981 | 12.2 | 27,636 | 42.3 |
| Upper | 2,028 | 1,119 | 3.4 | 55.2 | 106 | 5.2 | 803 | 39.6 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 73,631 | 33,379 | 100.0 | 45.3 | 8,687 | 11.8 | 31,565 | 42.9 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 292 | 6.2 | 267 | 6.3 | 11 | 3.5 | 14 | 9.3 |
| Middle | 4,296 | 91.3 | 3,865 | 91.1 | 300 | 96.2 | 131 | 86.8 |
| Upper | 118 | 2.5 | 111 | 2.6 | 1 | 0.3 | 6 | 4.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 4,706 | 100.0 | 4,243 | 100.0 | 312 | 100.0 | 151 | 100.0 |
| Percentage of Total Businesses: | | | | 90.2 | | 6.6 | | 3.2 |

| Combined Demographics Report | | | | | | | | |
|---|----------------------|--------------|-------------------------------|--------------|------------------|--------------|----------------------|------------|
| 2022 Luck-Hayward, WI AA | | | | | | | | |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 30 | 6.9 | 29 | 6.9 | 1 | 11.1 | 0 | 0.0 |
| Middle | 381 | 88.2 | 373 | 88.2 | 8 | 88.9 | 0 | 0.0 |
| Upper | 21 | 4.9 | 21 | 5.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 432 | 100.0 | 423 | 100.0 | 9 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 97.9 | | 2.1 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of Wisconsin for the year of loan origination. The table below shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

| Borrower Income Levels | | | | | | |
|---|-----------------|--------------|---------------------|--|---------------------|--------------------|
| Luck-Hayward, WI AA | | | | | | |
| FFIEC Estimated Median Family Income | | Low | Moderate | | Middle | Upper |
| | | 0 - 49.99% | 50% - 79.99% | | 80% - 119.99% | 120% - & above |
| 2020 | \$68,000 | 0 - \$33,999 | \$34,000 - \$54,399 | | \$54,400 - \$81,599 | \$81,600 - & above |
| 2021 | \$69,600 | 0 - \$34,799 | \$34,800 - \$55,679 | | \$55,680 - \$83,519 | \$83,520 - & above |
| 2022 | \$81,500 | 0 - \$40,749 | \$40,750 - \$65,199 | | \$65,200 - \$97,799 | \$97,800 - & above |

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the nonmetropolitan areas of Wisconsin, which was \$60,742 for 2020 and 2021, and \$71,740 for 2022.

Population. According to 2022 FFIEC adjusted census data, the total population of the AA is 98,432. Polk County is the most populous of the AA counties with 45.7% of the total population. Bank management indicated that after the start of the pandemic, some individuals with a second home in the area opted to take permanent residence in that home. A large percentage of residents in the AA are 25 to 64 years of age. The remaining age groups are as follows: 18.3% for residents 17 years and younger, 23.1% for residents 65 years and older, and 5.8% for residents aged 18 to 24 years.

Housing Information. According to 2022 FFIEC adjusted census data, the AA has 73,631 housing units: 45.3% are owner occupied, 11.8% are rental units, and 42.9% are vacant. The AA includes a notable presence of seasonal homes and cabins that are reflected in the percentage of vacant homes. The median age of the housing stock is 44 years, which is comparable to the statewide median age of 46 years. The median housing value is \$172,499, which is lower than the statewide median housing value of \$189,200. The affordability ratio for the AA is 32.7, compared to 33.5 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that, overall, housing is slightly less affordable in the AA than for statewide Wisconsin.

The table below shows the housing cost burden for renters and owners by geography and income level in the AA, counties comprising the AA, nonmetropolitan areas of Wisconsin, and the state of Wisconsin.³³ As reflected in the table, renters and homeowners in the low-income bracket and some owners in the moderate-income bracket exceed HUD's 30.0% cost-burden threshold. The cost burden is more significant for low-income individuals. Overall, the cost burden for renters and homeowners in the AA is generally comparable to the state, except for the state rental cost burden being higher than the cost burden in the AA.

| Housing Cost Burden | | | | | | |
|--|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area | Cost Burden - Renters | | | Cost Burden - Owners | | |
| | Low Income | Moderate Income | All Renters | Low Income | Moderate Income | All Owners |
| Luck-Hayward, WI AA | 57.0% | 16.5% | 31.2% | 61.4% | 29.1% | 20.3% |
| Bayfield County, WI | 49.6% | 15.1% | 29.6% | 60.6% | 23.0% | 19.7% |
| Burnett County, WI | 55.3% | 17.2% | 29.7% | 65.2% | 25.1% | 21.4% |
| Polk County, WI | 64.8% | 18.6% | 34.6% | 66.4% | 33.8% | 19.9% |
| Sawyer County, WI | 47.8% | 20.0% | 27.1% | 59.3% | 25.9% | 20.7% |
| Washburn County, WI | 60.0% | 9.4% | 30.8% | 51.4% | 32.1% | 20.4% |
| NonMSA Wisconsin | 66.4% | 19.1% | 34.0% | 60.0% | 26.0% | 18.2% |
| Wisconsin | 74.5% | 21.7% | 39.0% | 63.9% | 28.2% | 17.6% |
| <i>Cost Burden is housing cost that equals 30 percent or more of household income</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i> | | | | | | |

According to bank management, the area has a housing shortage. A community contact also noted the shortage of affordable rental housing, affordable homes for sale, and senior housing. The contact indicated that property values increased during the pandemic, which has impacted housing affordability for residents. During 2020 and 2021, new residents often bought homes for cash at inflated prices as they sought out a more rural living location. The contact stated that homeowners remodeling second homes in the area into permanent residences accelerated during the pandemic as people were able to work from home. Local contractors also faced increased prices for, and a shortage of, building supplies. The area also experienced an increase in vacation rentals and continues to have a significant number of residential properties that people use as second homes or recreational cabins.

General Economic and Business Information. According to bank management and a community contact, the overall economy in the area fared relatively well during the evaluation period despite the onset of the pandemic. According to the contact, economic growth in the area has typically been moderate and comes

³³ The Luck-Hayward, WI AA row in the table includes county-level data for all counties in the bank's AA.

from organic local business growth. Sales tax revenue climbed during the evaluation period as retail businesses did well during the pandemic. There were no significant business closures during the evaluation period. However, some businesses did face challenges, such as finding employees or changes in revenue. The contact indicated that the presence of many government-related jobs helped some counties' economies perform quite well during the pandemic.

The area economy is based on the livelihood of various small businesses and industries. Local industries include outdoor recreation-related tourism, industrial and manufacturing, government (including tribal), and healthcare. People in the area work at small businesses (including tourism-related businesses); some major employers such as the state, local, and tribal government (including the school districts and tribe-owned enterprises); and health care facilities. Both the St. Croix Chippewa Indians of Wisconsin and the Lac Courte Oreilles Band of Lake Superior Ojibwe tribes operate casinos and other entities (such as a university, health clinics, and a credit union) in the area, which employ a significant number of people. The AA is in a more rural portion of the state; however, many residents also commute to jobs in the following nearby areas: Minneapolis-St. Paul, Minnesota; Duluth, Minnesota; Superior, Wisconsin; and in counties adjacent to the AA. Generally, people can find employment; however, even with area wage increases in recent years, people can struggle to make a comfortable living wage.

The annual average unemployment rate for the AA was slightly higher than the rate for the state during the evaluation period. The higher annual average unemployment rates during 2020 were a result of the pandemic. The following table provides the annual average unemployment rates for the AA, counties in the AA, nonmetropolitan areas of the state, and the state of Wisconsin.³⁴

| Annual Average Unemployment Rates | | | |
|--|------|------|------|
| Area | 2020 | 2021 | 2022 |
| Luck-Hayward, WI AA | 7.8% | 4.8% | 4.1% |
| Bayfield County, WI | 9.3% | 5.8% | 4.8% |
| Burnett County, WI | 9.1% | 5.4% | 4.6% |
| Polk County, WI | 7.2% | 4.3% | 3.8% |
| Sawyer County, WI | 7.9% | 5.1% | 4.0% |
| Washburn County, WI | 6.9% | 4.6% | 3.7% |
| NonMSA Wisconsin | 6.4% | 3.9% | 3.1% |
| Wisconsin | 6.4% | 3.8% | 2.9% |
| Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics | | | |

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LUCK-HAYWARD, WISCONSIN, ASSESSMENT AREA

The bank's Lending Test performance in the Luck-Hayward AA is excellent. Lending levels show good responsiveness to AA credit needs. Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses of different sizes. The geographic distribution of loans is excellent. The bank is a leader in making community development loans. The bank uses flexible loan programs for borrowers. Examiners assigned equal weight to HMDA and small business loans given similar loan number volume during the evaluation period. Examiners did not include the bank's small farm lending in the analysis because agricultural loans are not a major product for this AA, based on volume.

³⁴ The Luck-Hayward, WI AA row in the table includes county-level data for all counties in the bank's AA.

The Investment Test performance in the Luck-Hayward AA is significant. Overall, the bank made a significant level of qualified investments, including donations, which shows good responsiveness to credit and community development needs.

Finally, under the Service Test, the bank's delivery systems are accessible to all portions of the AA and do not vary in a way that inconveniences certain individuals or areas. Further, the bank provides an adequate level of community development services in the AA.

LENDING TEST

The bank's Lending Test performance in the Luck-Hayward AA is excellent.

Lending Activity

Overall, the bank's lending activity reflects good responsiveness to AA credit needs. The bank's market share for HMDA was similar in 2021 and 2022; 1.7% and 2.2%, respectively. For HMDA loans, the bank ranked 15th among 355 lenders reporting HMDA loans in 2021 and 11th among 287 lenders in 2022. The bank ranked fifth, with 7.2% market share among 77 lenders reporting CRA data in 2021, and sixth, with 3.6% market share among 63 lenders in 2022. During the evaluation period, lending activity in this AA represented 4.7% by number and 4.0% by dollar amount of the bank's total lending. For the Wisconsin AAs, the lending activity in the Luck-Hayward AA represented 75.8% by number and 63.6% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2021 and 2022. The tables also include aggregate lending data for each year and demographics for families at various income levels.

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 11.5 | 4.7 | 379 | 7.9 | 2.2 | 21.1 |
| Moderate | 5 | 19.2 | 17.3 | 653 | 13.7 | 11.9 | 21.1 |
| Middle | 4 | 15.4 | 18.9 | 561 | 11.7 | 16.2 | 22.9 |
| Upper | 12 | 46.2 | 47.3 | 2,622 | 54.9 | 57.5 | 34.9 |
| Unknown | 2 | 7.7 | 11.8 | 561 | 11.7 | 12.2 | 0.0 |
| Total | 26 | 100.0 | 100.0 | 4,776 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 3 | 3.9 | 5.0 | 265 | 2.0 | 2.9 | 21.1 |
| Moderate | 13 | 17.1 | 15.2 | 1,635 | 12.6 | 10.2 | 21.1 |
| Middle | 21 | 27.6 | 21.2 | 3,102 | 23.9 | 17.4 | 22.9 |
| Upper | 37 | 48.7 | 47.3 | 7,493 | 57.8 | 57.3 | 34.9 |
| Unknown | 2 | 2.6 | 11.3 | 463 | 3.6 | 12.1 | 0.0 |
| Total | 76 | 100.0 | 100.0 | 12,958 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 6.6 | 0 | 0.0 | 3.2 | 21.1 |
| Moderate | 0 | 0.0 | 15.7 | 0 | 0.0 | 11.4 | 21.1 |
| Middle | 0 | 0.0 | 18.6 | 0 | 0.0 | 16.0 | 22.9 |
| Upper | 0 | 0.0 | 54.5 | 0 | 0.0 | 65.7 | 34.9 |
| Unknown | 0 | 0.0 | 4.5 | 0 | 0.0 | 3.6 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 6 | 5.8 | 5.0 | 644 | 3.6 | 2.7 | 21.1 |
| Moderate | 19 | 18.3 | 15.8 | 2,576 | 14.2 | 10.8 | 21.1 |
| Middle | 26 | 25.0 | 20.3 | 3,753 | 20.7 | 16.8 | 22.9 |
| Upper | 49 | 47.1 | 47.7 | 10,115 | 55.8 | 57.6 | 34.9 |
| Unknown | 4 | 3.8 | 11.2 | 1,024 | 5.7 | 12.1 | 0.0 |
| Total | 104 | 100.0 | 100.0 | 18,112 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 4.7 | 0 | 0.0 | 2.1 | 21.1 |
| Moderate | 0 | 0.0 | 12.9 | 0 | 0.0 | 6.2 | 21.1 |
| Middle | 0 | 0.0 | 23.0 | 0 | 0.0 | 18.0 | 22.9 |
| Upper | 0 | 0.0 | 53.5 | 0 | 0.0 | 67.6 | 34.9 |
| Unknown | 0 | 0.0 | 5.9 | 0 | 0.0 | 6.1 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 9.8 | 0 | 0.0 | 8.1 | 21.1 |
| Moderate | 1 | 50.0 | 17.6 | 288 | 76.2 | 10.2 | 21.1 |
| Middle | 1 | 50.0 | 19.6 | 90 | 23.8 | 12.2 | 22.9 |
| Upper | 0 | 0.0 | 51.0 | 0 | 0.0 | 61.2 | 34.9 |
| Unknown | 0 | 0.0 | 2.0 | 0 | 0.0 | 8.3 | 0.0 |
| Total | 2 | 100.0 | 100.0 | 378 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 3.7 | 0 | 0.0 | 1.6 | 21.1 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 21.1 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.9 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 34.9 |
| Unknown | 0 | 0.0 | 96.3 | 0 | 0.0 | 98.4 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 3.2 | 5.6 | 155 | 2.7 | 2.7 | 20.0 |
| Moderate | 6 | 19.4 | 17.7 | 1,047 | 18.2 | 11.5 | 19.2 |
| Middle | 8 | 25.8 | 18.5 | 1,245 | 21.6 | 15.8 | 23.0 |
| Upper | 13 | 41.9 | 43.3 | 2,776 | 48.2 | 55.1 | 37.8 |
| Unknown | 3 | 9.7 | 14.9 | 539 | 9.4 | 15.0 | 0.0 |
| Total | 31 | 100.0 | 100.0 | 5,762 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 1 | 8.3 | 10.3 | 86 | 6.8 | 4.8 | 20.0 |
| Moderate | 4 | 33.3 | 23.0 | 298 | 23.4 | 16.2 | 19.2 |
| Middle | 4 | 33.3 | 22.9 | 309 | 24.3 | 19.5 | 23.0 |
| Upper | 3 | 25.0 | 36.2 | 580 | 45.6 | 49.4 | 37.8 |
| Unknown | 0 | 0.0 | 7.7 | 0 | 0.0 | 10.1 | 0.0 |
| Total | 12 | 100.0 | 100.0 | 1,273 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 2 | 10.0 | 6.7 | 80 | 4.4 | 3.7 | 20.0 |
| Moderate | 4 | 20.0 | 15.9 | 170 | 9.3 | 10.1 | 19.2 |
| Middle | 6 | 30.0 | 21.6 | 771 | 42.3 | 18.9 | 23.0 |
| Upper | 8 | 40.0 | 53.7 | 800 | 43.9 | 61.2 | 37.8 |
| Unknown | 0 | 0.0 | 2.1 | 0 | 0.0 | 6.1 | 0.0 |
| Total | 20 | 100.0 | 100.0 | 1,821 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 6 | 7.9 | 7.7 | 431 | 4.3 | 3.5 | 20.0 |
| Moderate | 15 | 19.7 | 19.3 | 1,565 | 15.7 | 12.8 | 19.2 |
| Middle | 20 | 26.3 | 20.0 | 2,435 | 24.4 | 16.8 | 23.0 |
| Upper | 30 | 39.5 | 42.3 | 4,888 | 49.0 | 54.0 | 37.8 |
| Unknown | 5 | 6.6 | 10.8 | 658 | 6.6 | 12.9 | 0.0 |
| Total | 76 | 100.0 | 100.0 | 9,977 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 10.7 | 0 | 0.0 | 6.4 | 20.0 |
| Moderate | 0 | 0.0 | 21.9 | 0 | 0.0 | 16.3 | 19.2 |
| Middle | 0 | 0.0 | 19.6 | 0 | 0.0 | 16.2 | 23.0 |
| Upper | 0 | 0.0 | 45.2 | 0 | 0.0 | 59.0 | 37.8 |
| Unknown | 0 | 0.0 | 2.6 | 0 | 0.0 | 2.1 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 2 | 15.4 | 13.5 | 110 | 9.8 | 7.0 | 20.0 |
| Moderate | 1 | 7.7 | 15.7 | 50 | 4.5 | 12.1 | 19.2 |
| Middle | 2 | 15.4 | 15.7 | 110 | 9.8 | 8.7 | 23.0 |
| Upper | 6 | 46.2 | 49.4 | 732 | 65.3 | 67.5 | 37.8 |
| Unknown | 2 | 15.4 | 5.6 | 119 | 10.6 | 4.7 | 0.0 |
| Total | 13 | 100.0 | 100.0 | 1,121 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 20.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 19.2 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 37.8 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

In 2021 and 2022, the bank's overall lending to low-income borrowers was below demographics and comparable to aggregate lenders. Based on FFIEC adjusted census data, 21.1% and 20.0% of families in the AA were low income in 2021 and 2022, respectively. For those same years, the bank's overall lending to moderate-income borrowers was comparable to demographics and aggregate lenders. Based on FFIEC adjusted census data, 21.1% and 19.2% of families in the AA were moderate income in 2021 and 2022, respectively. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans as well as affordability factors. The bank ranked 15th in 2021 and 11th in 2022 among HMDA reporters in the AA. The bank's lending represents only 1.7% and 2.2% of HMDA loans reported in the AA for those years, respectively. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, credit unions, and large national banks.

Homes in the AA may be difficult for LMI borrowers to afford based on an assumption that a borrower can obtain a loan for approximately three times the borrower's annual income. Using the 2022 FFIEC estimated median family income of \$81,500 for the nonmetropolitan areas of Wisconsin, an individual with the highest income in the low-income bracket (\$40,749) could afford a \$122,247 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket (\$65,199) could afford a \$195,597 home. According to 2022 FFIEC adjusted census data, the median housing value in the

AA is \$172,499. This data suggests that homeownership would not be affordable for many low-income borrowers, as well as some moderate-income borrowers. As mentioned earlier, bank management noted a need for additional housing, including affordable housing, in the AA. Bank management and a community contact stated that housing prices have increased over the last few years.

In this AA, the bank made use of flexible lending programs to assist meeting the credit needs of LMI borrowers. The bank participated in the Freddie Mac Home Possible and Fannie Mae HomeReady programs, as well as the FHLB's Home\$tart grant program, which all help LMI borrowers achieve homeownership. The Home\$tart program funds can also be used for property rehabilitation. The bank also made an FHA loan in the AA. During the evaluation period, the bank made a total of approximately \$385,382 in loans and facilitated \$15,000 in grants through these programs. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2020 HMDA lending performance was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The tables below show the distribution of small business loans by revenue and loan size for 2021 and 2022, as well as aggregate lending data.

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses Luck-Hayward, WI AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 98 | 73.1 | 49.4 | 5,190 | 42.6 | 38.3 | 90.1 |
| Over \$1 Million | 20 | 14.9 | | 5,307 | 43.6 | | 6.7 |
| Revenue Unknown | 16 | 11.9 | | 1,673 | 13.7 | | 3.3 |
| Total | 134 | 100.0 | | 12,170 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 101 | 75.4 | 90.6 | 3,116 | 25.6 | 35.5 | |
| \$100,001 - \$250,000 | 20 | 14.9 | 5.6 | 3,042 | 25.0 | 23.1 | |
| \$250,001 - \$1 Million | 13 | 9.7 | 3.9 | 6,012 | 49.4 | 41.4 | |
| Total | 134 | 100.0 | 100.0 | 12,170 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 83 | 84.7 | | 2,355 | 45.4 | | |
| \$100,001 - \$250,000 | 12 | 12.2 | | 1,714 | 33.0 | | |
| \$250,001 - \$1 Million | 3 | 3.1 | | 1,121 | 21.6 | | |
| Total | 98 | 100.0 | | 5,190 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses Luck-Hayward, WI AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 43 | 64.2 | 55.1 | 3,463 | 35.9 | 42.9 | 90.2 |
| Over \$1 Million | 23 | 34.3 | | 5,939 | 61.6 | | 6.6 |
| Revenue Unknown | 1 | 1.5 | | 246 | 2.5 | | 3.2 |
| Total | 67 | 100.0 | | 9,648 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 42 | 62.7 | 91.5 | 2,074 | 21.5 | 37.2 | |
| \$100,001 - \$250,000 | 19 | 28.4 | 5.6 | 3,494 | 36.2 | 25.3 | |
| \$250,001 - \$1 Million | 6 | 9.0 | 2.9 | 4,080 | 42.3 | 37.5 | |
| Total | 67 | 100.0 | 100.0 | 9,648 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 32 | 74.4 | | 1,279 | 36.9 | | |
| \$100,001 - \$250,000 | 10 | 23.3 | | 1,659 | 47.9 | | |
| \$250,001 - \$1 Million | 1 | 2.3 | | 525 | 15.2 | | |
| Total | 43 | 100.0 | | 3,463 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's lending to small businesses exceeded aggregate lenders' activity in 2021 and 2022. According to 2021 and 2022 D&B data, 90.1% and 90.2% of businesses had gross annual revenues of \$1 million or less, respectively. For both years, the bank's and aggregate lenders' lending activities were below demographic data. The bank was below aggregate lenders when extending small business loans for amounts of \$100,000 or less but still made most of its loans in those smaller amounts. In 2021 and 2022, the bank made 84.7% and 74.4%, respectively, of its small business loans to small entities for amounts of \$100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with numerous financial institutions for small business loans, such as regional banks and large national banks, including national credit card issuers. In this AA, the bank's small business lending represented 7.2% and 3.6% of aggregate lenders' activity in 2021 and 2022, respectively.

In 2020 and 2021, the bank made extensive use of the PPP loan program; these loans are designed to help businesses keep their workforces employed during the pandemic. The bank originated over 200 PPP loans in amounts of \$1.0 million or less, totaling approximately \$9.0 million in this AA.³⁵ Of those PPP loans, more than half were for amounts of \$50,000 or less. These loan amounts suggest that many of the bank's

³⁵ This PPP data excludes loans with a North American Classification System code indicating the business is in the agricultural sector.

PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and contributes to the bank's performance.

The bank also made use of other SBA programs. During the evaluation period, the bank originated approximately \$2.3 million in loans through those programs.

The bank's 2020 small business lending performance was generally consistent with the bank's 2021 and 2022 small business lending performance.

Geographic Distribution

The bank's geographic distribution of loans reflects excellent dispersion among census tracts of difference income levels and does not reflect any unexplained gaps in lending. As previously mentioned, the income classification of some census tracts, as well as the number of tracts in the AA, changed during the evaluation period. In 2020, the AA included five moderate- and 20 middle-income census tracts. In 2021, the AA included five moderate- and 23 middle-income tracts. In 2022, the AA included three moderate- and 31 middle-income census tracts, as well as one upper-income tract. Middle-income tracts collectively represent 80.0%, 82.1%, and 88.6% of tracts in the AA in 2020, 2021, and 2022, respectively.

Residential Real Estate. Overall, the geographic distribution of HMDA loans is excellent, given performance context. The tables below display the distribution of the bank's 2021 and 2022 HMDA loans by census tract income level. The tables also include aggregate lending data for each year and demographics.

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 3.8 | 9.8 | 272 | 5.7 | 8.3 | 11.7 |
| Middle | 25 | 96.2 | 90.2 | 4,504 | 94.3 | 91.7 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 26 | 100.0 | 100.0 | 4,776 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 7 | 9.2 | 9.9 | 1,043 | 8.0 | 8.9 | 11.7 |
| Middle | 69 | 90.8 | 90.1 | 11,915 | 92.0 | 91.1 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 76 | 100.0 | 100.0 | 12,958 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|--|-----|-------|-------|--------|-------|-------|------------------------|
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 7.9 | 0 | 0.0 | 5.7 | 11.7 |
| Middle | 0 | 0.0 | 92.1 | 0 | 0.0 | 94.3 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 8.3 | 0 | 0.0 | 1.3 | 14.0 |
| Middle | 1 | 100.0 | 91.7 | 383 | 100.0 | 98.7 | 86.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 383 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 8 | 7.6 | 9.6 | 1,315 | 7.1 | 8.3 | 11.7 |
| Middle | 97 | 92.4 | 90.4 | 17,180 | 92.9 | 91.7 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 105 | 100.0 | 100.0 | 18,495 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-----|-------|---------|-----|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 5.5 | 0 | 0.0 | 5.4 | 11.7 |
| Middle | 0 | 0.0 | 94.5 | 0 | 0.0 | 94.6 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|---|---|-------|-------|-----|-------|-------|-------|
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 9.8 | 0 | 0.0 | 4.3 | 11.7 |
| Middle | 2 | 100.0 | 90.2 | 378 | 100.0 | 95.7 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 2 | 100.0 | 100.0 | 378 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 22.2 | 0 | 0.0 | 23.0 | 11.7 |
| Middle | 0 | 0.0 | 77.8 | 0 | 0.0 | 77.0 | 88.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 9.7 | 9.0 | 524 | 9.1 | 7.8 | 7.6 |
| Middle | 28 | 90.3 | 87.5 | 5,238 | 90.9 | 87.2 | 89.1 |
| Upper | 0 | 0.0 | 3.5 | 0 | 0.0 | 5.0 | 3.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 31 | 100.0 | 100.0 | 5,762 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 25.0 | 8.3 | 254 | 20.0 | 7.9 | 7.6 |
| Middle | 9 | 75.0 | 88.3 | 1,019 | 80.0 | 88.3 | 89.1 |
| Upper | 0 | 0.0 | 3.4 | 0 | 0.0 | 3.8 | 3.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 12 | 100.0 | 100.0 | 1,273 | 100.0 | 100.0 | 100.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|--|----|-------|-------|-------|-------|-------|---------------------------|
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 4 | 20.0 | 7.4 | 125 | 6.9 | 8.6 | 7.6 |
| Middle | 16 | 80.0 | 88.0 | 1,696 | 93.1 | 87.7 | 89.1 |
| Upper | 0 | 0.0 | 4.2 | 0 | 0.0 | 3.6 | 3.4 |
| Unknown | 0 | 0.0 | 0.4 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 20 | 100.0 | 100.0 | 1,821 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 11.1 | 0 | 0.0 | 1.6 | 9.4 |
| Middle | 0 | 0.0 | 83.3 | 0 | 0.0 | 93.1 | 89.9 |
| Upper | 0 | 0.0 | 5.6 | 0 | 0.0 | 5.3 | 0.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 12 | 15.8 | 8.5 | 1,022 | 10.2 | 7.5 | 7.6 |
| Middle | 64 | 84.2 | 87.9 | 8,955 | 89.8 | 87.9 | 89.1 |
| Upper | 0 | 0.0 | 3.6 | 0 | 0.0 | 4.6 | 3.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 76 | 100.0 | 100.0 | 9,977 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|--|--------------------------|-----|-------|---------|-----|-------|---------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 7.4 | 0 | 0.0 | 4.2 | 7.6 |
| Middle | 0 | 0.0 | 87.4 | 0 | 0.0 | 89.3 | 89.1 |
| Upper | 0 | 0.0 | 5.2 | 0 | 0.0 | 6.5 | 3.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|----|-------|-------|-------|-------|-------|-------|
| Luck-Hayward, WI AA | | | | | | | |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 2 | 15.4 | 6.7 | 119 | 10.6 | 4.3 | 7.6 |
| Middle | 11 | 84.6 | 92.1 | 1,002 | 89.4 | 95.2 | 89.1 |
| Upper | 0 | 0.0 | 1.1 | 0 | 0.0 | 0.5 | 3.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 13 | 100.0 | 100.0 | 1,121 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 10.0 | 0 | 0.0 | 9.3 | 7.6 |
| Middle | 0 | 0.0 | 90.0 | 0 | 0.0 | 90.7 | 89.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 3.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank made 7.6% and 15.8% of its HMDA loans in 2021 and 2022, respectively, in the moderate-income tracts. In 2021, the bank's lending in the moderate-income tracts is below demographics, which show that 11.7% of the AA's owner-occupied units and 12.0% of the AA families are in the moderate-income tracts. In 2022, the bank's lending in the moderate-income tracts exceeds demographics, which show that 7.6% of the AA's owner-occupied units and 7.2% of AA families are in the moderate-income tracts. According to FFIEC adjusted census data, 15.7% and 9.6% of housing units are rentals in 2021 and 2022, respectively, and 45.8% and 50.0% of housing units are vacant in the moderate-income tracts in 2021 and 2022, respectively. The bank's 2021 performance is comparable to aggregate lenders' performance; aggregate lenders reported 9.6% of HMDA loans in the moderate-income tracts. The bank's 2022 performance is nearly double that of aggregate lenders' performance; aggregate lenders reported 8.5% of HMDA loans in the moderate-income tracts. In 2022, the bank's performance in the moderate-income tracts is strongest in comparison to aggregate lender's activity and demographics despite overall lower loan volume than in 2021.

In 2021, the bank made HMDA loans in four of the five moderate-income census tracts in the AA. The bank did not lend in one moderate-income tract in Burnett County in 2021, nor in 2022 when the classification changed to middle income. This is reasonable because the bank does not have a branch in Burnett County. The bank made HMDA loans in all three moderate-income tracts in the AA in 2022. Over 2021 and 2022, the bank made HMDA loans in most middle-income tracts in this AA. The bank's loan dispersion is reasonable given tract demographics noted above and performance context. Over 2021 and 2022, the bank's loans were concentrated in Polk and Sawyer counties where the bank's branches are located. In addition, as previously mentioned, the banking environment is competitive in the AA; consumers have various creditors to choose from for their credit needs. Despite the bank's minimal market share of HMDA loans in 2021 and 2022 in this AA, the bank performed well compared to aggregate, particularly in 2022, as well as to demographics in 2022.

The bank's 2020 HMDA lending performance in moderate-income tracts was generally consistent with its 2021 and 2022 HMDA lending performance.

Small Business. Overall, the geographic distribution of small business loans is excellent. The following tables show the bank's 2021 and 2022 small business loans by income level of census tract, as well as aggregate lending data.

| Distribution of 2021 Small Business Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 16 | 11.9 | 9.8 | 1,711 | 14.1 | 7.5 | 11.6 |
| Middle | 118 | 88.1 | 88.9 | 10,459 | 85.9 | 92.2 | 88.4 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 1.3 | 0 | 0.0 | 0.2 | |
| Total | 134 | 100.0 | 100.0 | 12,170 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography Luck-Hayward, WI AA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 9 | 13.4 | 5.6 | 2,541 | 26.3 | 7.0 | 6.2 |
| Middle | 58 | 86.6 | 90.3 | 7,107 | 73.7 | 91.2 | 91.3 |
| Upper | 0 | 0.0 | 2.5 | 0 | 0.0 | 1.2 | 2.5 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 1.7 | 0 | 0.0 | 0.5 | |
| Total | 67 | 100.0 | 100.0 | 9,648 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

The bank's 2021 small business lending was comparable to aggregate lenders' activity and demographics in the moderate-income tracts. The bank's 2022 small business lending exceeded aggregate lenders' activity and demographics in the moderate-income tracts. According to D&B data, 11.6% of businesses in 2021 and 6.2% of businesses in 2022 were in the moderate-income tracts. Over 2021 and 2022, the bank made loans in all moderate-income tracts except for the one Burnett County moderate-income tract in 2022; however, the bank made a small business loan in this tract in 2021 when the tract was classified as middle-income. The bank made loans in most of the remaining tracts in its AA except for the upper-income tract in 2022 and some middle-income tracts. Like HMDA loans, in 2021 and 2022, the bank's loans were concentrated in the counties where the bank's branches are located. With the competitive banking environment, small businesses have various creditors to choose from, including national credit card lenders. Despite the bank's small market share of small business loans in 2021 and 2022 in this AA, the bank performed well compared to aggregate, particularly in 2022.

The bank's 2020 small business lending performance in moderate-income tracts was generally consistent with its 2021 and 2022 small business lending performance.

Community Development Loans

The bank is a leader in making community development loans in the Luck-Hayward AA. As shown in the table, the bank originated 24 community development loans, including many community development purpose PPP loans, totaling approximately \$14.3 million during the evaluation period. Most of the bank's community development lending dollars supported the revitalization or stabilization of underserved middle-income areas in the AA; a significant portion of those dollars funded essential healthcare operations (including operations in this midst of the pandemic). As shown, the bank also made loans supporting economic development and affordable housing in the AA. The bank's community development lending shows excellent responsiveness to AA needs.

| Community Development Lending in the Luck-Hayward AA | | |
|---|-----------|-------------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Affordable Housing | 1 | 382,500 |
| Economic Development | 11 | 3,210,798 |
| Revitalize or Stabilize | 12 | 10,732,086 |
| Total | 24 | 14,325,384 |

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments, including donations, in the Luck-Hayward AA. During the evaluation period, the bank purchased one MBS pool which helps support the affordable housing need in this AA. The amount of the pool benefiting this AA is \$247,398. The bank continues to hold one prior-period bond for \$180,000. This level of investment activity is adequate given the competitive banking environment.

The bank made an excellent level of qualified investments in the form of donations as shown in the table at right. Of the \$29,187 in donations during the evaluation period, most of the donations benefited organizations that provide community services to LMI individuals. The funds helped local organizations support basic needs such as food and housing, as well as education. Of the bank's donations, \$9,578, or 32.8%, helped address food insecurity in the AA,

| Qualified Investment Donations in the Luck-Hayward AA | | |
|--|-----------|---------------|
| <i>Purpose</i> | <i>#</i> | <i>\$</i> |
| Community Service | 34 | 20,237 |
| Economic Development | 5 | 7,250 |
| Revitalize or Stabilize | 5 | 1,700 |
| Total | 44 | 29,187 |

including during the height of the pandemic. Other donations during the evaluation period supported economic development and revitalization or stabilization of moderate-income and underserved middle-income areas. The bank's donations show excellent responsiveness to the needs in the AA.

SERVICE TEST

The bank's delivery systems are accessible to geographies and individuals throughout the AA, and retail services do not vary in a way that inconveniences certain individuals or areas. The bank provides an adequate level of community development services.

Retail Services

Delivery systems in the Luck-Hayward AA are accessible to the bank's geographies and to individuals of different income levels. During the evaluation period, the bank operated two full-service offices in the AA: one in Luck and one in Hayward, both in middle-income census tracts. The Hayward branch is a new office for the bank since the October 2020 merger with Peoples Bank Midwest. The bank did not close any branches in this AA during the evaluation period.

Both branches have a drive-up facility and a cash-dispensing-only ATM. The Hayward branch offers weekend hours. During the evaluation period, both branches were in middle-income census tracts; however, the Luck branch was approximately 1.5 miles from one of the moderate-income tracts in 2022.³⁶

The following table shows the geographic distribution of branches in this AA as of December 31, 2022.

| 2022 Geographic Distribution of Branches Luck-Hayward, WI AA | | | | | | | | | | | |
|---|----------------|----------|---------------|----------|---------------|-------------------|------------------|---------------|-------|------------|---------------------|
| Tract Income Levels | BRANCHES | | | | | | | DEMOGRAPHICS | | | |
| | Total Branches | | Opened | Closed* | Drive Thru | Extended Hours | Weekend Hours | Census Tracts | | Households | Total Businesses |
| | # | % | # | # | # | # | # | # | % | % | % |
| Low | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 0 | 0.0% | 0.0% | 0.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Moderate | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 3 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 3 | 8.6% | 7.4% | 6.3% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Middle | Total | 2 | 100.0% | 0 | 0 | 2 | 0 | 1 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 31 | 88.6% | 89.6% | 91.0% |
| | LS | 0 | | 0 | 0 | | | | | | |
| Upper | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 1 | | | |
| | DTO | 0 | | 0 | 0 | 0 | | 1 | 2.9% | 2.9% | 2.7% |
| | LS | 0 | | 0 | 0 | | | | | | |

³⁶ Census data changes impacted the income-level designation of some tracts from 2021 to 2022, which altered the branches' proximity to certain tracts.

| | | | | | | | | | | | | |
|---------------|--------------|----------|---------------|----------|----------|----------|----------|----------|----|--------|--------|--------|
| Unknown | Total | 0 | 0.0% | 0 | 0 | 0 | 0 | 0 | | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 0 | 0.0% | 0.0% | 0.0% |
| | LS | 0 | | 0 | 0 | | | | | | | |
| <i>Totals</i> | Total | 2 | 100.0% | 0 | 0 | 2 | 0 | 1 | | | | |
| | DTO | 0 | | 0 | 0 | 0 | | | 35 | 100.0% | 100.0% | 100.0% |
| | LS | 0 | | 0 | 0 | | | | | | | |

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

Community Development Services

The bank provided an adequate level of community development services in this AA. The table to the right shows the service activity and purpose category during the evaluation period. Three bank employees provided seven community development services for three organizations. The bank's community development services benefited organizations that provide essential services to LMI individuals, such as shelter, vocational rehabilitation, and elder care, and an organization that promotes economic development. Bank employees served as board members for two organizations and one employee assisted the remaining organization with grant writing. Over the evaluation period, the bank's services addressed community needs such as essential basic needs, as well as business development.

| Community Development Services in the Luck-Hayward AA | |
|--|----------|
| <i>Purpose</i> | # |
| Community Services | 4 |
| Economic Development | 3 |
| Total | 7 |

METROPOLITAN AREA LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EAU CLAIRE, WISCONSIN, MSA ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Eau Claire County, in the west-central portion of the state. Eau Claire County is part of the Eau Claire, WI MSA. The bank added this AA since the previous evaluation because of a bank merger in October 2020. As of 2022, the branch was in a moderate-income tract (previously a middle-income tract) due to census tract classification changes. The bank did not close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EAU CLAIRE ASSESSMENT AREA

Examiners determined that the bank's lending test,³⁷ investment test, and service test performance in this AA is consistent with the performance in the state.

The bank made \$13.4 million in community development loans benefiting this AA, which is a noteworthy level and includes SBA 504 loans. The loans helped to revitalize or stabilize qualified areas, as well as supported economic development and affordable housing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF WISCONSIN

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank's community development activity for each AA. Conclusions regarding performance of the limited-scope AA, which did not affect the state rating, are shown in the following table.

| Performance in the Limited-Scope Review Wisconsin MSA AA | | | |
|---|--------------|-----------------|--------------|
| AA | Lending Test | Investment Test | Service Test |
| Eau Claire MSA | Consistent | Consistent | Consistent |

³⁷ Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA. For HMDA and small business loans, examiners reviewed the bank's 2021 and 2022 loan data only due to minimal lending activity in 2020.

APPENDIX A

Scope of Evaluation

| SCOPE OF EVALUATION FOR LENDING ACTIVITY January 1, 2020, through December 31, 2022 | |
|--|--|
| <i>FINANCIAL INSTITUTION</i> | <i>PRODUCTS REVIEWED</i> |
| Frandsen Bank & Trust | HMDA loans Small business loans Small farm loans |
| | |
| <i>AFFILIATES</i> | <i>PRODUCTS REVIEWED</i> |
| Not applicable | Not applicable |
| SCOPE OF EVALUATION FOR COMMUNITY DEVELOPMENT ACTIVITY January 1, 2020, through December 31, 2022 | |

| LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION | | | |
|--|----------------------------------|---|---------------------------------|
| <i>ASSESSMENT AREA</i> | <i>TYPE OF EVALUATION</i> | <i>BRANCHES VISITED³⁸</i> | <i>OTHER INFORMATION</i> |
| Grand Forks Multistate MSA | Full scope | None | |
| Minneapolis-St. Paul MSA | Full scope | None | |
| Duluth MSA | Full scope | None | |
| New Ulm-Mankato CSA | Full scope | None | |
| Ada, Minnesota | Limited scope | None | |
| Baxter Lakes, Minnesota | Limited scope | None | |
| Bird Island-Fairfax-Hector, Minnesota | Limited scope | None | |
| Clinton, Minnesota | Limited scope | None | |
| Lonsdale/Lonsdale-Goodhue, Minnesota | Limited scope | None | |
| Pine City, Minnesota | Limited scope | None | |
| St. Cloud MSA | Limited scope | None | |
| Warren-Oslo, Minnesota | Limited scope | None | |
| Luck-Hayward | Full scope | None | |
| Eau Claire MSA | Limited scope | None | |

Note: "Branches visited" indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution's CRA performance takes into consideration activity from all branch locations, as described in the Scope of Evaluation section of the report.

³⁸ There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

APPENDIX B

Summary of Multistate MSA and State Ratings

| <i>State Name</i> | <i>Lending Test Rating</i> | <i>Investment Test Rating</i> | <i>Service Test Rating</i> | <i>Overall State Rating</i> |
|----------------------------|----------------------------|-------------------------------|----------------------------|-----------------------------|
| Grand Forks Multistate MSA | Outstanding | High Satisfactory | Low Satisfactory | Satisfactory |
| Minnesota | Outstanding | High Satisfactory | High Satisfactory | Outstanding |
| Wisconsin | Outstanding | High Satisfactory | Low Satisfactory | Satisfactory |

APPENDIX C

Glossary of Common CRA Terms

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 statistical area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income census tracts, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts; or (5) Neighborhood Stabilization Program (NSP)-eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and census tracts.

Consumer loan: A loan to one or more individuals for household, family, or other personal expenditures. It 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.

Distressed nonmetropolitan middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% or more over the 5-year period preceding the most recent census.

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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into "male householder" (a family with a male householder and no wife present) or "female householder" (a family with a female householder and no husband present).

Full-scope review: Performance is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 data such as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (i.e., approved, denied, or withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments).

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 statistical area/assessment area.

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

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

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

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

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated area: A rated area is a state or multistate MSA. 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 MSA, the institution will receive a rating for the multistate metropolitan area.

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

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

Underserved middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

(For additional information, please see the Definitions sections of Regulation BB at 12 C.F.R. 28.12.)

APPENDIX D

Lending and Demographic Tables for Limited-Scope Reviews

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Ada, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 66 | 93.0 | 66.0 | 6,081 | 91.9 | 76.8 | 97.2 |
| Over \$1 Million | 5 | 7.0 | | 539 | 8.1 | | 2.8 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 71 | 100.0 | | 6,620 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 51 | 71.8 | 74.4 | 1,337 | 20.2 | 18.7 | |
| \$100,001 - \$250,000 | 12 | 16.9 | 16.0 | 2,261 | 34.2 | 37.0 | |
| \$250,001 - \$500,000 | 8 | 11.3 | 9.6 | 3,022 | 45.6 | 44.3 | |
| Total | 71 | 100.0 | 100.0 | 6,620 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 47 | 71.2 | | 1,198 | 19.7 | | |
| \$100,001 - \$250,000 | 12 | 18.2 | | 2,261 | 37.2 | | |
| \$250,001 - \$500,000 | 7 | 10.6 | | 2,622 | 43.1 | | |
| Total | 66 | 100.0 | | 6,081 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Ada, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | №% | №% | \$(000) | №% | №% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 32 | 88.9 | 55.8 | 4,410 | 87.2 | 72.4 | 97.1 |
| Over \$1 Million | 4 | 11.1 | | 649 | 12.8 | | 2.9 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 36 | 100.0 | | 5,059 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 17 | 47.2 | 72.5 | 858 | 17.0 | 20.4 | |
| \$100,001 - \$250,000 | 14 | 38.9 | 17.5 | 2,593 | 51.3 | 38.0 | |
| \$250,001 - \$500,000 | 5 | 13.9 | 10.0 | 1,608 | 31.8 | 41.6 | |
| Total | 36 | 100.0 | 100.0 | 5,059 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 16 | 50.0 | | 822 | 18.6 | | |
| \$100,001 - \$250,000 | 12 | 37.5 | | 2,305 | 52.3 | | |
| \$250,001 - \$500,000 | 4 | 12.5 | | 1,283 | 29.1 | | |
| Total | 32 | 100.0 | | 4,410 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Ada, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 71 | 100.0 | 100.0 | 6,620 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 71 | 100.0 | 100.0 | 6,620 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|------------------|
| Assessment Area: Ada, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 36 | 100.0 | 100.0 | 5,059 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 36 | 100.0 | 100.0 | 5,059 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2022 Dun & Bradstreet Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Ada, MN, Assessment Area Demographic Data | | | | | | | | |
|--|---------------------------|-----------------------|-----------------------------|--------------|---|-----------|------------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 313 | 18.3 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 337 | 19.7 |
| Middle | 3 | 100.0 | 1,707 | 100.0 | 89 | 5.2 | 386 | 22.6 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 671 | 39.3 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 3 | 100.0 | 1,707 | 100.0 | 89 | 5.2 | 1,707 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 3,434 | 2,232 | 100.0 | 65.0 | 539 | 15.7 | 663 | 19.3 |
| Upper | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 3,434 | 2,232 | 100.0 | 65.0 | 539 | 15.7 | 663 | 19.3 |

| 2022 Ada, MN, Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-------|------------------------------------|-------|------------------|-------|----------------------|-------|
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 413 | 100.0 | 359 | 100.0 | 29 | 100.0 | 25 | 100.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 413 | 100.0 | 359 | 100.0 | 29 | 100.0 | 25 | 100.0 |
| Percentage of Total Businesses: | | | | 86.9 | | 7.0 | | 6.1 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 171 | 100.0 | 166 | 100.0 | 5 | 100.0 | 0 | 0.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 171 | 100.0 | 166 | 100.0 | 5 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 97.1 | | 2.9 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Baxter Lakes, MN | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 4.0 | 6.6 | 70 | 1.2 | 3.0 | 20.5 |
| Moderate | 6 | 24.0 | 15.2 | 821 | 13.6 | 9.6 | 19.8 |
| Middle | 8 | 32.0 | 18.5 | 1,443 | 24.0 | 14.6 | 23.2 |
| Upper | 8 | 32.0 | 41.1 | 3,133 | 52.1 | 54.6 | 36.5 |
| Unknown | 2 | 8.0 | 18.7 | 552 | 9.2 | 18.2 | 0.0 |
| Total | 25 | 100.0 | 100.0 | 6,019 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 8 | 9.4 | 5.8 | 856 | 4.6 | 2.8 | 20.5 |
| Moderate | 21 | 24.7 | 13.8 | 3,139 | 17.0 | 8.7 | 19.8 |
| Middle | 19 | 22.4 | 19.6 | 3,187 | 17.3 | 14.8 | 23.2 |
| Upper | 35 | 41.2 | 44.6 | 10,702 | 58.1 | 56.1 | 36.5 |
| Unknown | 2 | 2.4 | 16.3 | 543 | 2.9 | 17.6 | 0.0 |
| Total | 85 | 100.0 | 100.0 | 18,427 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 7.8 | 0 | 0.0 | 2.3 | 20.5 |
| Moderate | 0 | 0.0 | 16.7 | 0 | 0.0 | 9.8 | 19.8 |
| Middle | 1 | 50.0 | 17.8 | 85 | 53.1 | 13.9 | 23.2 |
| Upper | 0 | 0.0 | 48.9 | 0 | 0.0 | 68.0 | 36.5 |
| Unknown | 1 | 50.0 | 8.9 | 75 | 46.9 | 6.1 | 0.0 |
| Total | 2 | 100.0 | 100.0 | 160 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 7.8 | 6.0 | 926 | 3.7 | 2.8 | 20.5 |
| Moderate | 27 | 23.5 | 14.2 | 3,960 | 15.7 | 9.0 | 19.8 |
| Middle | 28 | 24.3 | 19.0 | 4,715 | 18.7 | 14.5 | 23.2 |
| Upper | 46 | 40.0 | 43.6 | 14,457 | 57.3 | 55.7 | 36.5 |
| Unknown | 5 | 4.3 | 17.2 | 1,170 | 4.6 | 18.0 | 0.0 |
| Total | 115 | 100.0 | 100.0 | 25,228 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 1.3 | 0 | 0.0 | 0.5 | 20.5 |
| Moderate | 0 | 0.0 | 7.5 | 0 | 0.0 | 3.5 | 19.8 |
| Middle | 0 | 0.0 | 16.3 | 0 | 0.0 | 8.3 | 23.2 |
| Upper | 0 | 0.0 | 67.5 | 0 | 0.0 | 80.6 | 36.5 |
| Unknown | 0 | 0.0 | 7.5 | 0 | 0.0 | 7.1 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 4.3 | 0 | 0.0 | 1.6 | 20.5 |
| Moderate | 0 | 0.0 | 11.4 | 0 | 0.0 | 4.6 | 19.8 |
| Middle | 0 | 0.0 | 18.6 | 0 | 0.0 | 6.7 | 23.2 |
| Upper | 3 | 100.0 | 60.0 | 622 | 100.0 | 65.1 | 36.5 |
| Unknown | 0 | 0.0 | 5.7 | 0 | 0.0 | 22.1 | 0.0 |
| Total | 3 | 100.0 | 100.0 | 622 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 20.5 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 19.8 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.2 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 36.5 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Baxter Lakes, MN | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 4.9 | 5.5 | 233 | 1.6 | 2.8 | 20.3 |
| Moderate | 4 | 9.8 | 17.9 | 658 | 4.4 | 10.7 | 20.2 |
| Middle | 8 | 19.5 | 17.6 | 1,989 | 13.3 | 13.4 | 21.8 |
| Upper | 26 | 63.4 | 41.2 | 11,755 | 78.7 | 55.8 | 37.7 |
| Unknown | 1 | 2.4 | 17.7 | 297 | 2.0 | 17.4 | 0.0 |
| Total | 41 | 100.0 | 100.0 | 14,932 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 9.5 | 0 | 0.0 | 4.1 | 20.3 |
| Moderate | 3 | 23.1 | 21.5 | 385 | 12.4 | 13.0 | 20.2 |
| Middle | 3 | 23.1 | 21.8 | 396 | 12.7 | 17.2 | 21.8 |
| Upper | 7 | 53.8 | 37.3 | 2,325 | 74.9 | 51.5 | 37.7 |
| Unknown | 0 | 0.0 | 9.9 | 0 | 0.0 | 14.1 | 0.0 |
| Total | 13 | 100.0 | 100.0 | 3,106 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 4.1 | 0 | 0.0 | 1.4 | 20.3 |
| Moderate | 1 | 14.3 | 17.1 | 20 | 2.2 | 8.2 | 20.2 |
| Middle | 3 | 42.9 | 21.8 | 250 | 27.5 | 15.8 | 21.8 |
| Upper | 3 | 42.9 | 52.4 | 640 | 70.3 | 72.5 | 37.7 |
| Unknown | 0 | 0.0 | 4.7 | 0 | 0.0 | 2.1 | 0.0 |
| Total | 7 | 100.0 | 100.0 | 910 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 2 | 3.0 | 6.8 | 233 | 1.2 | 3.1 | 20.3 |
| Moderate | 9 | 13.6 | 18.5 | 1,387 | 7.1 | 11.0 | 20.2 |
| Middle | 17 | 25.8 | 19.3 | 2,825 | 14.4 | 14.4 | 21.8 |
| Upper | 37 | 56.1 | 41.6 | 14,910 | 75.9 | 56.1 | 37.7 |
| Unknown | 1 | 1.5 | 13.8 | 297 | 1.5 | 15.4 | 0.0 |
| Total | 66 | 100.0 | 100.0 | 19,652 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 5.5 | 0 | 0.0 | 3.2 | 20.3 |
| Moderate | 0 | 0.0 | 13.6 | 0 | 0.0 | 5.0 | 20.2 |
| Middle | 0 | 0.0 | 17.3 | 0 | 0.0 | 12.2 | 21.8 |
| Upper | 0 | 0.0 | 60.0 | 0 | 0.0 | 76.8 | 37.7 |
| Unknown | 0 | 0.0 | 3.6 | 0 | 0.0 | 2.8 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 6.5 | 0 | 0.0 | 1.4 | 20.3 |
| Moderate | 1 | 20.0 | 9.8 | 324 | 46.0 | 3.3 | 20.2 |
| Middle | 3 | 60.0 | 23.9 | 190 | 27.0 | 7.8 | 21.8 |
| Upper | 1 | 20.0 | 55.4 | 190 | 27.0 | 83.5 | 37.7 |
| Unknown | 0 | 0.0 | 4.3 | 0 | 0.0 | 4.0 | 0.0 |
| Total | 5 | 100.0 | 100.0 | 704 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 20.3 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 20.2 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 21.8 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 37.7 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 40 | 60.6 | 50.3 | 2,626 | 36.4 | 36.6 | 92.6 |
| Over \$1 Million | 21 | 31.8 | | 4,496 | 62.3 | | 5.7 |
| Revenue Unknown | 5 | 7.6 | | 94 | 1.3 | | 1.6 |
| Total | 66 | 100.0 | | 7,216 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 51 | 77.3 | 90.0 | 1,751 | 24.3 | 28.8 | |
| \$100,001 - \$250,000 | 8 | 12.1 | 5.2 | 1,519 | 21.1 | 19.7 | |
| \$250,001 - \$1 Million | 7 | 10.6 | 4.8 | 3,946 | 54.7 | 51.6 | |
| Total | 66 | 100.0 | 100.0 | 7,216 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 33 | 82.5 | | 790 | 30.1 | | |
| \$100,001 - \$250,000 | 4 | 10.0 | | 638 | 24.3 | | |
| \$250,001 - \$1 Million | 3 | 7.5 | | 1,198 | 45.6 | | |
| Total | 40 | 100.0 | | 2,626 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 24 | 55.8 | 52.6 | 2,354 | 44.3 | 44.6 | 92.4 |
| Over \$1 Million | 16 | 37.2 | | 2,898 | 54.5 | | 5.7 |
| Revenue Unknown | 3 | 7.0 | | 63 | 1.2 | | 1.8 |
| Total | 43 | 100.0 | | 5,315 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 29 | 67.4 | 90.1 | 1,362 | 25.6 | 31.6 | |
| \$100,001 - \$250,000 | 10 | 23.3 | 5.4 | 1,678 | 31.6 | 19.3 | |
| \$250,001 - \$1 Million | 4 | 9.3 | 4.5 | 2,275 | 42.8 | 49.1 | |
| Total | 43 | 100.0 | 100.0 | 5,315 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 16 | 66.7 | | 831 | 35.3 | | |
| \$100,001 - \$250,000 | 6 | 25.0 | | 843 | 35.8 | | |
| \$250,001 - \$1 Million | 2 | 8.3 | | 680 | 28.9 | | |
| Total | 24 | 100.0 | | 2,354 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 12.0 | 8.8 | 521 | 8.7 | 5.6 | 8.3 |
| Middle | 20 | 80.0 | 84.1 | 5,166 | 85.8 | 86.9 | 84.9 |
| Upper | 2 | 8.0 | 7.1 | 332 | 5.5 | 7.5 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 25 | 100.0 | 100.0 | 6,019 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|-----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 2 | 2.4 | 5.4 | 310 | 1.7 | 3.7 | 8.3 |
| Middle | 76 | 89.4 | 86.5 | 16,476 | 89.4 | 87.7 | 84.9 |
| Upper | 7 | 8.2 | 8.1 | 1,641 | 8.9 | 8.6 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 85 | 100.0 | 100.0 | 18,427 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 5.6 | 0 | 0.0 | 3.5 | 8.3 |
| Middle | 2 | 100.0 | 87.8 | 160 | 100.0 | 88.2 | 84.9 |
| Upper | 0 | 0.0 | 6.7 | 0 | 0.0 | 8.2 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 2 | 100.0 | 100.0 | 160 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 30.0 | 0 | 0.0 | 44.9 | 12.9 |
| Middle | 0 | 0.0 | 70.0 | 0 | 0.0 | 55.1 | 83.2 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 3.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 5 | 4.3 | 6.7 | 831 | 3.3 | 4.8 | 8.3 |
| Middle | 101 | 87.8 | 85.6 | 22,424 | 88.9 | 87.2 | 84.9 |
| Upper | 9 | 7.8 | 7.7 | 1,973 | 7.8 | 8.0 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 115 | 100.0 | 100.0 | 25,228 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 1.3 | 0 | 0.0 | 0.9 | 8.3 |
| Middle | 0 | 0.0 | 88.8 | 0 | 0.0 | 90.1 | 84.9 |
| Upper | 0 | 0.0 | 10.0 | 0 | 0.0 | 9.0 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 2.9 | 0 | 0.0 | 1.1 | 8.3 |
| Middle | 3 | 100.0 | 92.9 | 622 | 100.0 | 98.3 | 84.9 |
| Upper | 0 | 0.0 | 4.3 | 0 | 0.0 | 0.6 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 3 | 100.0 | 100.0 | 622 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 22.2 | 0 | 0.0 | 13.0 | 8.3 |
| Middle | 0 | 0.0 | 63.0 | 0 | 0.0 | 72.3 | 84.9 |
| Upper | 0 | 0.0 | 14.8 | 0 | 0.0 | 14.7 | 6.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|------|------|---------|------|------|---------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 9 | 22.0 | 28.9 | 1,623 | 10.9 | 18.6 | 27.5 |
| Middle | 31 | 75.6 | 63.8 | 12,883 | 86.3 | 74.3 | 66.2 |
| Upper | 1 | 2.4 | 7.3 | 426 | 2.9 | 7.1 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 41 | 100.0 | 100.0 | 14,932 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 23.1 | 21.9 | 383 | 12.3 | 14.0 | 27.5 |
| Middle | 9 | 69.2 | 71.6 | 2,373 | 76.4 | 80.3 | 66.2 |
| Upper | 1 | 7.7 | 6.5 | 350 | 11.3 | 5.7 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 13 | 100.0 | 100.0 | 3,106 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 17.1 | 0 | 0.0 | 10.6 | 27.5 |
| Middle | 7 | 100.0 | 77.6 | 910 | 100.0 | 84.6 | 66.2 |
| Upper | 0 | 0.0 | 5.3 | 0 | 0.0 | 4.8 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 7 | 100.0 | 100.0 | 910 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 54.5 | 0 | 0.0 | 25.0 | 62.1 |
| Middle | 0 | 0.0 | 27.3 | 0 | 0.0 | 7.6 | 31.3 |
| Upper | 0 | 0.0 | 18.2 | 0 | 0.0 | 67.5 | 6.7 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 13 | 19.7 | 25.0 | 2,031 | 10.3 | 16.6 | 27.5 |
| Middle | 51 | 77.3 | 68.1 | 16,845 | 85.7 | 74.6 | 66.2 |
| Upper | 2 | 3.0 | 7.0 | 776 | 3.9 | 8.8 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 66 | 100.0 | 100.0 | 19,652 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 9.1 | 0 | 0.0 | 4.5 | 27.5 |
| Middle | 0 | 0.0 | 80.9 | 0 | 0.0 | 87.5 | 66.2 |
| Upper | 0 | 0.0 | 10.0 | 0 | 0.0 | 8.1 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 20.0 | 15.2 | 25 | 3.6 | 3.5 | 27.5 |
| Middle | 4 | 80.0 | 81.5 | 679 | 96.4 | 94.0 | 66.2 |
| Upper | 0 | 0.0 | 3.3 | 0 | 0.0 | 2.5 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 704 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 40.0 | 0 | 0.0 | 27.0 | 27.5 |
| Middle | 0 | 0.0 | 50.0 | 0 | 0.0 | 72.9 | 66.2 |
| Upper | 0 | 0.0 | 10.0 | 0 | 0.0 | 0.1 | 6.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 1.5 | 9.0 | 221 | 3.1 | 10.3 | 10.3 |
| Middle | 57 | 86.4 | 81.6 | 6,301 | 87.3 | 85.2 | 83.4 |
| Upper | 8 | 12.1 | 7.3 | 694 | 9.6 | 4.2 | 6.3 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 2.1 | 0 | 0.0 | 0.3 | |
| Total | 66 | 100.0 | 100.0 | 7,216 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Baxter Lakes, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 7 | 16.3 | 23.4 | 809 | 15.2 | 25.9 | 30.2 |
| Middle | 29 | 67.4 | 65.4 | 4,083 | 76.8 | 57.0 | 62.7 |
| Upper | 7 | 16.3 | 9.8 | 423 | 8.0 | 16.7 | 7.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 1.4 | 0 | 0.0 | 0.4 | |
| Total | 43 | 100.0 | 100.0 | 5,315 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Baxter Lakes, MN, Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 4,517 | 20.3 |
| Moderate | 7 | 26.9 | 6,721 | 30.2 | 749 | 11.1 | 4,483 | 20.2 |
| Middle | 17 | 65.4 | 14,211 | 63.9 | 750 | 5.3 | 4,845 | 21.8 |
| Upper | 2 | 7.7 | 1,298 | 5.8 | 0 | 0.0 | 8,385 | 37.7 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 26 | 100.0 | 22,230 | 100.0 | 1,499 | 6.7 | 22,230 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 14,282 | 7,348 | 27.5 | 51.4 | 4,534 | 31.7 | 2,400 | 16.8 |
| Middle | 35,970 | 17,673 | 66.2 | 49.1 | 2,733 | 7.6 | 15,564 | 43.3 |
| Upper | 2,359 | 1,667 | 6.2 | 70.7 | 387 | 16.4 | 305 | 12.9 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 52,611 | 26,688 | 100.0 | 50.7 | 7,654 | 14.5 | 18,269 | 34.7 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 1,456 | 30.2 | 1,320 | 29.6 | 108 | 39.0 | 28 | 32.2 |
| Middle | 3,021 | 62.7 | 2,823 | 63.4 | 142 | 51.3 | 56 | 64.4 |
| Upper | 342 | 7.1 | 312 | 7.0 | 27 | 9.7 | 3 | 3.4 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 4,819 | 100.0 | 4,455 | 100.0 | 277 | 100.0 | 87 | 100.0 |
| Percentage of Total Businesses: | | | | 92.4 | | 5.7 | | 1.8 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 49 | 30.8 | 48 | 30.8 | 1 | 50.0 | 0 | 0.0 |
| Middle | 108 | 67.9 | 106 | 67.9 | 1 | 50.0 | 1 | 100.0 |
| Upper | 2 | 1.3 | 2 | 1.3 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |

| 2022 Baxter Lakes, MN, Assessment Area Demographic Data | | | | | | | | |
|---|-----|-------|-----|-------|---|-------|---|-------|
| Total AA | 159 | 100.0 | 156 | 100.0 | 2 | 100.0 | 1 | 100.0 |
| Percentage of Total Farms: | | | | 98.1 | | 1.3 | | 0.6 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 85 | 88.5 | 63.3 | 2,211 | 49.1 | 41.3 | 85.8 |
| Over \$1 Million | 10 | 10.4 | | 2,080 | 46.2 | | 9.3 |
| Revenue Unknown | 1 | 1.0 | | 208 | 4.6 | | 4.9 |
| Total | 96 | 100.0 | | 4,499 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 84 | 87.5 | 91.7 | 1,806 | 40.1 | 39.9 | |
| \$100,001 - \$250,000 | 10 | 10.4 | 5.4 | 1,543 | 34.3 | 22.2 | |
| \$250,001 - \$1 Million | 2 | 2.1 | 2.9 | 1,150 | 25.6 | 38.0 | |
| Total | 96 | 100.0 | 100.0 | 4,499 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 80 | 94.1 | | 1,551 | 70.1 | | |
| \$100,001 - \$250,000 | 5 | 5.9 | | 660 | 29.9 | | |
| \$250,001 - \$1 Million | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 85 | 100.0 | | 2,211 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 24 | 75.0 | 49.8 | 1,047 | 29.2 | 22.8 | 85.5 |
| Over \$1 Million | 8 | 25.0 | | 2,537 | 70.8 | | 9.0 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 5.5 |
| Total | 32 | 100.0 | | 3,584 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 23 | 71.9 | 92.7 | 633 | 17.7 | 35.2 | |
| \$100,001 - \$250,000 | 6 | 18.8 | 4.8 | 901 | 25.1 | 19.9 | |
| \$250,001 - \$1 Million | 3 | 9.4 | 2.4 | 2,050 | 57.2 | 44.9 | |
| Total | 32 | 100.0 | 100.0 | 3,584 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 21 | 87.5 | | 569 | 54.3 | | |
| \$100,001 - \$250,000 | 3 | 12.5 | | 478 | 45.7 | | |
| \$250,001 - \$1 Million | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 24 | 100.0 | | 1,047 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|--|--------------------------|-------|------|---------|-------|------------------|-------|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | Total Farms % | |
| | Bank | | Agg | Bank | | | Agg |
| | # | % | % | \$(000) | % | | % |
| By Revenue | | | | | | | |
| \$1 Million or Less | 245 | 89.7 | 74.0 | 17,307 | 81.3 | 72.6 | 98.2 |
| Over \$1 Million | 28 | 10.3 | | 3,968 | 18.7 | | 1.8 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 273 | 100.0 | | 21,275 | 100.0 | | 100.0 |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|-----|-------|-------|--------|-------|-------|--|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 207 | 75.8 | 78.5 | 5,959 | 28.0 | 26.7 | |
| \$100,001 - \$250,000 | 45 | 16.5 | 14.0 | 7,565 | 35.6 | 33.5 | |
| \$250,001 - \$500,000 | 21 | 7.7 | 7.5 | 7,751 | 36.4 | 39.8 | |
| Total | 273 | 100.0 | 100.0 | 21,275 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 192 | 78.4 | | 5,579 | 32.2 | | |
| \$100,001 - \$250,000 | 40 | 16.3 | | 6,701 | 38.7 | | |
| \$250,001 - \$500,000 | 13 | 5.3 | | 5,027 | 29.0 | | |
| Total | 245 | 100.0 | | 17,307 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 88 | 83.0 | 54.2 | 13,223 | 69.4 | 53.5 | 98.4 |
| Over \$1 Million | 18 | 17.0 | | 5,835 | 30.6 | | 1.6 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 106 | 100.0 | | 19,058 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 42 | 39.6 | 60.1 | 2,335 | 12.3 | 14.7 | |
| \$100,001 - \$250,000 | 40 | 37.7 | 24.0 | 7,208 | 37.8 | 34.6 | |
| \$250,001 - \$500,000 | 24 | 22.6 | 15.9 | 9,515 | 49.9 | 50.7 | |
| Total | 106 | 100.0 | 100.0 | 19,058 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 41 | 46.6 | | 2,235 | 16.9 | | |
| \$100,001 - \$250,000 | 34 | 38.6 | | 5,915 | 44.7 | | |
| \$250,001 - \$500,000 | 13 | 14.8 | | 5,073 | 38.4 | | |
| Total | 88 | 100.0 | | 13,223 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 96 | 100.0 | 99.7 | 4,499 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.0 | |
| Total | 96 | 100.0 | 100.0 | 4,499 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 32 | 100.0 | 96.5 | 3,584 | 100.0 | 98.5 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 3.5 | 0 | 0.0 | 1.5 | |
| Total | 32 | 100.0 | 100.0 | 3,584 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 273 | 100.0 | 100.0 | 21,275 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 273 | 100.0 | 100.0 | 21,275 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Bird Island-Fairfax-Hector, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 106 | 100.0 | 99.7 | 19,058 | 100.0 | 99.9 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | |
| Total | 106 | 100.0 | 100.0 | 19,058 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Bird Island-Fairfax-Hector, MN, Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 793 | 17.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 966 | 20.7 |
| Middle | 7 | 100.0 | 4,672 | 100.0 | 248 | 5.3 | 1,192 | 25.5 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 1,721 | 36.8 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 7 | 100.0 | 4,672 | 100.0 | 248 | 5.3 | 4,672 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 9,042 | 5,900 | 100.0 | 65.3 | 1,668 | 18.4 | 1,474 | 16.3 |
| Upper | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 9,042 | 5,900 | 100.0 | 65.3 | 1,668 | 18.4 | 1,474 | 16.3 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 834 | 100.0 | 713 | 100.0 | 75 | 100.0 | 46 | 100.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 834 | 100.0 | 713 | 100.0 | 75 | 100.0 | 46 | 100.0 |
| Percentage of Total Businesses: | | | | 85.5 | | 9.0 | | 5.5 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 321 | 100.0 | 316 | 100.0 | 5 | 100.0 | 0 | 0.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |

| 2022 Bird Island-Fairfax-Hector, MN, Assessment Area Demographic Data | | | | | | | | |
|---|-----|-------|-----|-------|---|-------|---|-----|
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 321 | 100.0 | 316 | 100.0 | 5 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.4 | | 1.6 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Clinton, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 27 | 87.1 | 60.4 | 1,057 | 69.9 | 52.4 | 87.2 |
| Over \$1 Million | 4 | 12.9 | | 456 | 30.1 | | 6.7 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 6.1 |
| Total | 31 | 100.0 | | 1,513 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 29 | 93.5 | 89.6 | 1,055 | 69.7 | 36.3 | |
| \$100,001 - \$250,000 | 2 | 6.5 | 6.5 | 458 | 30.3 | 24.2 | |
| \$250,001 - \$1 Million | 0 | 0.0 | 3.9 | 0 | 0.0 | 39.5 | |
| Total | 31 | 100.0 | 100.0 | 1,513 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 26 | 96.3 | | 809 | 76.5 | | |
| \$100,001 - \$250,000 | 1 | 3.7 | | 248 | 23.5 | | |
| \$250,001 - \$1 Million | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 27 | 100.0 | | 1,057 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Assessment Area: Clinton, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 192 | 85.0 | 76.2 | 13,290 | 75.8 | 76.6 | 98.7 |
| Over \$1 Million | 27 | 11.9 | | 3,845 | 21.9 | | 1.3 |
| Revenue Unknown | 7 | 3.1 | | 403 | 2.3 | | 0.0 |
| Total | 226 | 100.0 | | 17,538 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 174 | 77.0 | 81.0 | 4,308 | 24.6 | 29.6 | |
| \$100,001 - \$250,000 | 31 | 13.7 | 12.7 | 5,668 | 32.3 | 34.9 | |
| \$250,001 - \$500,000 | 21 | 9.3 | 6.2 | 7,562 | 43.1 | 35.5 | |
| Total | 226 | 100.0 | 100.0 | 17,538 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 150 | 78.1 | | 3,377 | 25.4 | | |
| \$100,001 - \$250,000 | 27 | 14.1 | | 4,964 | 37.4 | | |
| \$250,001 - \$500,000 | 15 | 7.8 | | 4,949 | 37.2 | | |
| Total | 192 | 100.0 | | 13,290 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Assessment Area: Clinton, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 79 | 68.7 | 59.3 | 11,907 | 56.9 | 60.1 | 98.6 |
| Over \$1 Million | 27 | 23.5 | | 8,556 | 40.9 | | 1.4 |
| Revenue Unknown | 9 | 7.8 | | 445 | 2.1 | | 0.0 |
| Total | 115 | 100.0 | | 20,908 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 55 | 47.8 | 61.4 | 2,153 | 10.3 | 14.1 | |
| \$100,001 - \$250,000 | 26 | 22.6 | 18.0 | 5,110 | 24.4 | 25.2 | |
| \$250,001 - \$500,000 | 34 | 29.6 | 20.6 | 13,645 | 65.3 | 60.7 | |
| Total | 115 | 100.0 | 100.0 | 20,908 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 43 | 54.4 | | 1,735 | 14.6 | | |
| \$100,001 - \$250,000 | 18 | 22.8 | | 3,418 | 28.7 | | |
| \$250,001 - \$500,000 | 18 | 22.8 | | 6,754 | 56.7 | | |
| Total | 79 | 100.0 | | 11,907 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------|
| Assessment Area: Clinton, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 69 | 100.0 | 99.5 | 2,748 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.5 | 0 | 0.0 | 0.0 | |
| Total | 69 | 100.0 | 100.0 | 2,748 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Clinton, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 31 | 100.0 | 99.4 | 1,513 | 100.0 | 99.9 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.1 | |
| Total | 31 | 100.0 | 100.0 | 1,513 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Clinton, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 226 | 100.0 | 100.0 | 17,538 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 226 | 100.0 | 100.0 | 17,538 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Clinton, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 115 | 100.0 | 100.0 | 20,908 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 115 | 100.0 | 100.0 | 20,908 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Clinton, MN, Assessment Area Demographic Data | | | | | | | | |
|--|---------------------------|-----------------------|-----------------------------|--------------|---|-----------|------------------------------|--------------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 332 | 18.8 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 353 | 20.0 |
| Middle | 4 | 100.0 | 1,766 | 100.0 | 136 | 7.7 | 377 | 21.3 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 704 | 39.9 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 4 | 100.0 | 1,766 | 100.0 | 136 | 7.7 | 1,766 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 3,973 | 1,999 | 100.0 | 50.3 | 819 | 20.6 | 1,155 | 29.1 |
| Upper | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 3,973 | 1,999 | 100.0 | 50.3 | 819 | 20.6 | 1,155 | 29.1 |

| 2022 Clinton, MN, Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-------|------------------------------------|-------|------------------|-------|----------------------|-------|
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 313 | 100.0 | 273 | 100.0 | 21 | 100.0 | 19 | 100.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 313 | 100.0 | 273 | 100.0 | 21 | 100.0 | 19 | 100.0 |
| Percentage of Total Businesses: | | | | 87.2 | | 6.7 | | 6.1 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 147 | 100.0 | 145 | 100.0 | 2 | 100.0 | 0 | 0.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 147 | 100.0 | 145 | 100.0 | 2 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.6 | | 1.4 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Lonsdale, MN | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 3.8 | 0.8 | 40 | 0.6 | 0.3 | 12.4 |
| Moderate | 4 | 15.4 | 13.4 | 840 | 12.3 | 9.2 | 13.0 |
| Middle | 6 | 23.1 | 27.0 | 1,826 | 26.7 | 24.8 | 22.0 |
| Upper | 14 | 53.8 | 42.6 | 3,865 | 56.6 | 49.0 | 52.5 |
| Unknown | 1 | 3.8 | 16.2 | 259 | 3.8 | 16.7 | 0.0 |
| Total | 26 | 100.0 | 100.0 | 6,830 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 2 | 3.6 | 2.0 | 197 | 1.6 | 1.0 | 12.4 |
| Moderate | 7 | 12.5 | 12.4 | 1,050 | 8.4 | 8.9 | 13.0 |
| Middle | 17 | 30.4 | 24.9 | 3,892 | 31.1 | 22.1 | 22.0 |
| Upper | 28 | 50.0 | 45.7 | 6,898 | 55.1 | 51.7 | 52.5 |
| Unknown | 2 | 3.6 | 15.0 | 490 | 3.9 | 16.3 | 0.0 |
| Total | 56 | 100.0 | 100.0 | 12,527 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 1.6 | 0 | 0.0 | 0.5 | 12.4 |
| Moderate | 0 | 0.0 | 11.3 | 0 | 0.0 | 9.7 | 13.0 |
| Middle | 0 | 0.0 | 19.4 | 0 | 0.0 | 21.9 | 22.0 |
| Upper | 3 | 100.0 | 64.5 | 148 | 100.0 | 66.3 | 52.5 |
| Unknown | 0 | 0.0 | 3.2 | 0 | 0.0 | 1.6 | 0.0 |
| Total | 3 | 100.0 | 100.0 | 148 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 3 | 3.3 | 1.7 | 237 | 1.2 | 0.7 | 12.4 |
| Moderate | 12 | 13.3 | 12.7 | 1,980 | 9.8 | 9.1 | 13.0 |
| Middle | 27 | 30.0 | 25.5 | 6,244 | 31.0 | 23.2 | 22.0 |
| Upper | 45 | 50.0 | 45.1 | 10,911 | 54.2 | 50.5 | 52.5 |
| Unknown | 3 | 3.3 | 15.0 | 749 | 3.7 | 16.5 | 0.0 |
| Total | 90 | 100.0 | 100.0 | 20,121 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 4.0 | 0 | 0.0 | 1.2 | 12.4 |
| Moderate | 0 | 0.0 | 16.0 | 0 | 0.0 | 10.2 | 13.0 |
| Middle | 0 | 0.0 | 24.0 | 0 | 0.0 | 10.5 | 22.0 |
| Upper | 0 | 0.0 | 56.0 | 0 | 0.0 | 78.1 | 52.5 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 9.1 | 0 | 0.0 | 5.4 | 12.4 |
| Moderate | 1 | 20.0 | 9.1 | 90 | 14.6 | 12.9 | 13.0 |
| Middle | 4 | 80.0 | 33.3 | 526 | 85.4 | 36.7 | 22.0 |
| Upper | 0 | 0.0 | 45.5 | 0 | 0.0 | 41.0 | 52.5 |
| Unknown | 0 | 0.0 | 3.0 | 0 | 0.0 | 4.0 | 0.0 |
| Total | 5 | 100.0 | 100.0 | 616 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 12.4 |
| Moderate | 0 | 0.0 | 12.5 | 0 | 0.0 | 8.0 | 13.0 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 52.5 |
| Unknown | 0 | 0.0 | 87.5 | 0 | 0.0 | 92.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 9.5 | 4.7 | 780 | 12.2 | 2.5 | 13.7 |
| Moderate | 2 | 9.5 | 21.5 | 547 | 8.5 | 15.2 | 15.6 |
| Middle | 2 | 9.5 | 25.4 | 456 | 7.1 | 23.5 | 21.9 |
| Upper | 10 | 47.6 | 30.7 | 3,740 | 58.4 | 41.1 | 48.9 |
| Unknown | 5 | 23.8 | 17.7 | 880 | 13.7 | 17.7 | 0.0 |
| Total | 21 | 100.0 | 100.0 | 6,403 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 9.0 | 0 | 0.0 | 5.4 | 13.7 |
| Moderate | 4 | 25.0 | 21.4 | 704 | 20.0 | 16.6 | 15.6 |
| Middle | 4 | 25.0 | 27.0 | 672 | 19.0 | 24.5 | 21.9 |
| Upper | 8 | 50.0 | 35.4 | 2,152 | 61.0 | 40.1 | 48.9 |
| Unknown | 0 | 0.0 | 7.3 | 0 | 0.0 | 13.5 | 0.0 |
| Total | 16 | 100.0 | 100.0 | 3,528 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 2.3 | 0 | 0.0 | 1.4 | 13.7 |
| Moderate | 1 | 8.3 | 12.2 | 50 | 4.1 | 10.5 | 15.6 |
| Middle | 5 | 41.7 | 26.4 | 297 | 24.2 | 23.6 | 21.9 |
| Upper | 6 | 50.0 | 57.1 | 878 | 71.7 | 62.7 | 48.9 |
| Unknown | 0 | 0.0 | 2.0 | 0 | 0.0 | 1.8 | 0.0 |
| Total | 12 | 100.0 | 100.0 | 1,225 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 6 | 10.5 | 5.9 | 1,080 | 9.1 | 3.3 | 13.7 |
| Moderate | 8 | 14.0 | 20.2 | 1,351 | 11.4 | 15.3 | 15.6 |
| Middle | 11 | 19.3 | 25.8 | 1,425 | 12.0 | 23.7 | 21.9 |
| Upper | 27 | 47.4 | 35.0 | 7,100 | 60.0 | 41.6 | 48.9 |
| Unknown | 5 | 8.8 | 13.1 | 880 | 7.4 | 16.1 | 0.0 |
| Total | 57 | 100.0 | 100.0 | 11,836 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |
| Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 6.7 | 0 | 0.0 | 2.4 | 13.7 |
| Moderate | 0 | 0.0 | 11.2 | 0 | 0.0 | 7.9 | 15.6 |
| Middle | 0 | 0.0 | 22.5 | 0 | 0.0 | 19.9 | 21.9 |
| Upper | 0 | 0.0 | 55.1 | 0 | 0.0 | 64.1 | 48.9 |
| Unknown | 0 | 0.0 | 4.5 | 0 | 0.0 | 5.8 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 4 | 50.0 | 14.5 | 300 | 44.1 | 12.8 | 13.7 |
| Moderate | 1 | 12.5 | 14.5 | 50 | 7.4 | 9.4 | 15.6 |
| Middle | 0 | 0.0 | 27.5 | 0 | 0.0 | 26.7 | 21.9 |
| Upper | 3 | 37.5 | 42.0 | 330 | 48.5 | 49.4 | 48.9 |
| Unknown | 0 | 0.0 | 1.4 | 0 | 0.0 | 1.7 | 0.0 |
| Total | 8 | 100.0 | 100.0 | 680 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 13.7 |
| Moderate | 0 | 0.0 | 6.3 | 0 | 0.0 | 4.6 | 15.6 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 21.9 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 48.9 |
| Unknown | 0 | 0.0 | 93.8 | 0 | 0.0 | 95.4 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|------|---------|-------|------|--------------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 97 | 82.2 | 50.9 | 4,605 | 52.9 | 30.7 | 93.1 |
| Over \$1 Million | 18 | 15.3 | | 4,016 | 46.2 | | 6.1 |
| Revenue Unknown | 3 | 2.5 | | 80 | 0.9 | | 0.8 |
| Total | 118 | 100.0 | | 8,701 | 100.0 | | 100.0 |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|-----|-------|-------|-------|-------|-------|--|
| Assessment Area: Lonsdale, MN | | | | | | | |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 99 | 83.9 | 91.0 | 2,735 | 31.4 | 37.7 | |
| \$100,001 - \$250,000 | 9 | 7.6 | 5.5 | 1,440 | 16.5 | 22.8 | |
| \$250,001 - \$1 Million | 10 | 8.5 | 3.5 | 4,526 | 52.0 | 39.5 | |
| Total | 118 | 100.0 | 100.0 | 8,701 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 89 | 91.8 | | 2,289 | 49.7 | | |
| \$100,001 - \$250,000 | 4 | 4.1 | | 688 | 14.9 | | |
| \$250,001 - \$1 Million | 4 | 4.1 | | 1,628 | 35.4 | | |
| Total | 97 | 100.0 | | 4,605 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 44 | 77.2 | 49.4 | 4,344 | 56.3 | 40.0 | 92.0 |
| Over \$1 Million | 13 | 22.8 | | 3,372 | 43.7 | | 6.6 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 1.4 |
| Total | 57 | 100.0 | | 7,716 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 39 | 68.4 | 92.4 | 1,719 | 22.3 | 34.8 | |
| \$100,001 - \$250,000 | 9 | 15.8 | 3.9 | 1,629 | 21.1 | 16.4 | |
| \$250,001 - \$1 Million | 9 | 15.8 | 3.6 | 4,368 | 56.6 | 48.7 | |
| Total | 57 | 100.0 | 100.0 | 7,716 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 35 | 79.5 | | 1,451 | 33.4 | | |
| \$100,001 - \$250,000 | 4 | 9.1 | | 675 | 15.5 | | |
| \$250,001 - \$1 Million | 5 | 11.4 | | 2,218 | 51.1 | | |
| Total | 44 | 100.0 | | 4,344 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 63 | 95.5 | 72.4 | 4,128 | 91.9 | 86.7 | 99.4 |
| Over \$1 Million | 2 | 3.0 | | 352 | 7.8 | | 0.6 |
| Revenue Unknown | 1 | 1.5 | | 13 | 0.3 | | 0.0 |
| Total | 66 | 100.0 | | 4,493 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 53 | 80.3 | 84.3 | 1,374 | 30.6 | 29.4 | |
| \$100,001 - \$250,000 | 9 | 13.6 | 11.0 | 1,553 | 34.6 | 36.3 | |
| \$250,001 - \$500,000 | 4 | 6.1 | 4.7 | 1,566 | 34.9 | 34.3 | |
| Total | 66 | 100.0 | 100.0 | 4,493 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 52 | 82.5 | | 1,361 | 33.0 | | |
| \$100,001 - \$250,000 | 7 | 11.1 | | 1,201 | 29.1 | | |
| \$250,001 - \$500,000 | 4 | 6.3 | | 1,566 | 37.9 | | |
| Total | 63 | 100.0 | | 4,128 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 23 | 85.2 | 56.6 | 2,862 | 82.1 | 71.1 | 98.6 |
| Over \$1 Million | 2 | 7.4 | | 550 | 15.8 | | 1.4 |
| Revenue Unknown | 2 | 7.4 | | 73 | 2.1 | | 0.0 |
| Total | 27 | 100.0 | | 3,485 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 17 | 63.0 | 81.4 | 862 | 24.7 | 30.1 | |
| \$100,001 - \$250,000 | 5 | 18.5 | 10.5 | 943 | 27.1 | 26.5 | |
| \$250,001 - \$500,000 | 5 | 18.5 | 8.2 | 1,680 | 48.2 | 43.4 | |
| Total | 27 | 100.0 | 100.0 | 3,485 | 100.0 | 100.0 | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|----|-------|--|-------|-------|--|--|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 15 | 65.2 | | 789 | 27.6 | | |
| \$100,001 - \$250,000 | 4 | 17.4 | | 743 | 26.0 | | |
| \$250,001 - \$500,000 | 4 | 17.4 | | 1,330 | 46.5 | | |
| Total | 23 | 100.0 | | 2,862 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 5 | 19.2 | 35.6 | 1,075 | 15.7 | 31.6 | 41.6 |
| Upper | 21 | 80.8 | 64.4 | 5,755 | 84.3 | 68.4 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 26 | 100.0 | 100.0 | 6,830 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 12 | 21.4 | 32.0 | 2,843 | 22.7 | 29.7 | 41.6 |
| Upper | 44 | 78.6 | 68.0 | 9,684 | 77.3 | 70.3 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 56 | 100.0 | 100.0 | 12,527 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 1 | 33.3 | 29.0 | 50 | 33.8 | 15.6 | 41.6 |
| Upper | 2 | 66.7 | 71.0 | 98 | 66.2 | 84.4 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 3 | 100.0 | 100.0 | 148 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 79.8 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 20.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 19 | 21.1 | 33.1 | 4,108 | 20.4 | 36.7 | 41.6 |
| Upper | 71 | 78.9 | 66.9 | 16,013 | 79.6 | 63.3 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 90 | 100.0 | 100.0 | 20,121 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 0 | 0.0 | 16.0 | 0 | 0.0 | 8.1 | 41.6 |
| Upper | 0 | 0.0 | 84.0 | 0 | 0.0 | 91.9 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 1 | 20.0 | 27.3 | 140 | 22.7 | 28.5 | 41.6 |
| Upper | 4 | 80.0 | 72.7 | 476 | 77.3 | 71.5 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 5 | 100.0 | 100.0 | 616 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|---|-----|-------|---|-----|-------|-------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 0 | 0.0 | 12.5 | 0 | 0.0 | 12.1 | 41.6 |
| Upper | 0 | 0.0 | 87.5 | 0 | 0.0 | 87.9 | 58.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 10.8 | 0 | 0.0 | 7.7 | 7.6 |
| Middle | 5 | 23.8 | 40.0 | 1,222 | 19.1 | 37.0 | 36.4 |
| Upper | 16 | 76.2 | 49.2 | 5,181 | 80.9 | 55.2 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 21 | 100.0 | 100.0 | 6,403 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 6.7 | 0 | 0.0 | 4.1 | 7.6 |
| Middle | 0 | 0.0 | 32.9 | 0 | 0.0 | 32.1 | 36.4 |
| Upper | 16 | 100.0 | 60.4 | 3,528 | 100.0 | 63.8 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 16 | 100.0 | 100.0 | 3,528 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 1.7 | 0 | 0.0 | 1.3 | 7.6 |
| Middle | 1 | 8.3 | 30.4 | 423 | 34.5 | 30.5 | 36.4 |
| Upper | 11 | 91.7 | 68.0 | 802 | 65.5 | 68.2 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 12 | 100.0 | 100.0 | 1,225 | 100.0 | 100.0 | 100.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 15.2 | 0 | 0.0 | 13.4 | 11.2 |
| Middle | 0 | 0.0 | 33.3 | 0 | 0.0 | 43.9 | 58.7 |
| Upper | 0 | 0.0 | 51.5 | 0 | 0.0 | 42.7 | 30.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 8.7 | 0 | 0.0 | 7.2 | 7.6 |
| Middle | 7 | 12.3 | 36.8 | 1,745 | 14.7 | 36.3 | 36.4 |
| Upper | 50 | 87.7 | 54.5 | 10,091 | 85.3 | 56.4 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 57 | 100.0 | 100.0 | 11,836 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 5.6 | 0 | 0.0 | 2.5 | 7.6 |
| Middle | 0 | 0.0 | 33.7 | 0 | 0.0 | 31.5 | 36.4 |
| Upper | 0 | 0.0 | 60.7 | 0 | 0.0 | 66.1 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 5.8 | 0 | 0.0 | 1.4 | 7.6 |
| Middle | 1 | 12.5 | 34.8 | 100 | 14.7 | 36.1 | 36.4 |
| Upper | 7 | 87.5 | 59.4 | 580 | 85.3 | 62.5 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 8 | 100.0 | 100.0 | 680 | 100.0 | 100.0 | 100.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|---|-----|-------|---|-----|-------|-------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 18.8 | 0 | 0.0 | 17.2 | 7.6 |
| Middle | 0 | 0.0 | 31.3 | 0 | 0.0 | 32.2 | 36.4 |
| Upper | 0 | 0.0 | 50.0 | 0 | 0.0 | 50.6 | 56.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 33 | 28.0 | 33.8 | 2,584 | 29.7 | 38.1 | 40.0 |
| Upper | 85 | 72.0 | 66.2 | 6,117 | 70.3 | 61.9 | 60.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 118 | 100.0 | 100.0 | 8,701 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2021 Dun & Bradstreet Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 2 | 3.5 | 11.9 | 828 | 10.7 | 16.1 | 12.3 |
| Middle | 6 | 10.5 | 28.5 | 891 | 11.5 | 19.9 | 30.7 |
| Upper | 49 | 86.0 | 59.0 | 5,997 | 77.7 | 63.7 | 57.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.2 | |
| Total | 57 | 100.0 | 100.0 | 7,716 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Assessment Area: Lonsdale, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 15 | 22.7 | 25.2 | 640 | 14.2 | 13.0 | 29.2 |
| Upper | 51 | 77.3 | 74.8 | 3,853 | 85.8 | 87.0 | 70.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 66 | 100.0 | 100.0 | 4,493 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Lonsdale-Goodhue, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | 1.3 |
| Middle | 1 | 3.7 | 23.2 | 280 | 8.0 | 19.0 | 21.9 |
| Upper | 26 | 96.3 | 76.5 | 3,205 | 92.0 | 80.9 | 76.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 27 | 100.0 | 100.0 | 3,485 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Lonsdale-Goodhue, MN, Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-----------------------|-----------------------------|--------------|---|-----------|------------------------------|--------------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 4,541 | 13.7 |
| Moderate | 3 | 9.7 | 2,762 | 8.3 | 475 | 17.2 | 5,157 | 15.6 |
| Middle | 12 | 38.7 | 12,182 | 36.8 | 682 | 5.6 | 7,254 | 21.9 |
| Upper | 16 | 51.6 | 18,202 | 54.9 | 569 | 3.1 | 16,194 | 48.9 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 31 | 100.0 | 33,146 | 100.0 | 1,726 | 5.2 | 33,146 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 5,069 | 2,844 | 7.6 | 56.1 | 1,876 | 37.0 | 349 | 6.9 |
| Middle | 20,255 | 13,666 | 36.4 | 67.5 | 5,590 | 27.6 | 999 | 4.9 |
| Upper | 27,204 | 21,064 | 56.1 | 77.4 | 4,005 | 14.7 | 2,135 | 7.8 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 52,528 | 37,574 | 100.0 | 71.5 | 11,471 | 21.8 | 3,483 | 6.6 |

| 2022 Lonsdale-Goodhue, MN, Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-------|------------------------------------|-------|------------------|-------|----------------------|-------|
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 740 | 12.3 | 650 | 11.7 | 85 | 21.6 | 5 | 5.9 |
| Middle | 1,849 | 30.7 | 1,730 | 31.3 | 97 | 24.6 | 22 | 25.9 |
| Upper | 3,426 | 57.0 | 3,156 | 57.0 | 212 | 53.8 | 58 | 68.2 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 6,015 | 100.0 | 5,536 | 100.0 | 394 | 100.0 | 85 | 100.0 |
| Percentage of Total Businesses: | | | | 92.0 | | 6.6 | | 1.4 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 10 | 1.3 | 9 | 1.2 | 1 | 9.1 | 0 | 0.0 |
| Middle | 170 | 21.9 | 167 | 21.9 | 3 | 27.3 | 0 | 0.0 |
| Upper | 595 | 76.8 | 588 | 77.0 | 7 | 63.6 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 775 | 100.0 | 764 | 100.0 | 11 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.6 | | 1.4 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Pine City, MN | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 10.5 | 7.5 | 123 | 4.1 | 4.1 | 23.3 |
| Moderate | 3 | 15.8 | 21.9 | 348 | 11.5 | 16.9 | 22.2 |
| Middle | 5 | 26.3 | 23.4 | 600 | 19.8 | 22.5 | 22.9 |
| Upper | 8 | 42.1 | 29.3 | 1,758 | 58.1 | 38.1 | 31.6 |
| Unknown | 1 | 5.3 | 18.0 | 196 | 6.5 | 18.4 | 0.0 |
| Total | 19 | 100.0 | 100.0 | 3,025 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 4 | 10.5 | 7.6 | 436 | 6.9 | 4.8 | 23.3 |
| Moderate | 9 | 23.7 | 20.3 | 1,188 | 18.9 | 16.2 | 22.2 |
| Middle | 9 | 23.7 | 25.1 | 1,256 | 20.0 | 24.2 | 22.9 |
| Upper | 16 | 42.1 | 31.2 | 3,414 | 54.2 | 37.1 | 31.6 |
| Unknown | 0 | 0.0 | 15.8 | 0 | 0.0 | 17.7 | 0.0 |
| Total | 38 | 100.0 | 100.0 | 6,294 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 1 | 50.0 | 7.4 | 15 | 11.1 | 3.1 | 23.3 |
| Moderate | 0 | 0.0 | 11.1 | 0 | 0.0 | 9.5 | 22.2 |
| Middle | 0 | 0.0 | 27.8 | 0 | 0.0 | 32.0 | 22.9 |
| Upper | 1 | 50.0 | 50.0 | 120 | 88.9 | 50.8 | 31.6 |
| Unknown | 0 | 0.0 | 3.7 | 0 | 0.0 | 4.6 | 0.0 |
| Total | 2 | 100.0 | 100.0 | 135 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 10 | 14.3 | 7.6 | 764 | 7.4 | 4.5 | 23.3 |
| Moderate | 14 | 20.0 | 20.4 | 1,771 | 17.2 | 16.3 | 22.2 |
| Middle | 16 | 22.9 | 24.6 | 2,042 | 19.8 | 23.6 | 22.9 |
| Upper | 27 | 38.6 | 30.8 | 5,342 | 51.8 | 37.6 | 31.6 |
| Unknown | 3 | 4.3 | 16.6 | 391 | 3.8 | 18.0 | 0.0 |
| Total | 70 | 100.0 | 100.0 | 10,310 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.3 |
| Moderate | 0 | 0.0 | 4.3 | 0 | 0.0 | 4.6 | 22.2 |
| Middle | 0 | 0.0 | 47.8 | 0 | 0.0 | 44.5 | 22.9 |
| Upper | 0 | 0.0 | 43.5 | 0 | 0.0 | 47.2 | 31.6 |
| Unknown | 0 | 0.0 | 4.3 | 0 | 0.0 | 3.8 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 3 | 27.3 | 14.3 | 190 | 22.2 | 7.8 | 23.3 |
| Moderate | 2 | 18.2 | 18.4 | 235 | 27.5 | 16.9 | 22.2 |
| Middle | 2 | 18.2 | 30.6 | 186 | 21.7 | 32.0 | 22.9 |
| Upper | 2 | 18.2 | 32.7 | 50 | 5.8 | 39.8 | 31.6 |
| Unknown | 2 | 18.2 | 4.1 | 195 | 22.8 | 3.5 | 0.0 |
| Total | 11 | 100.0 | 100.0 | 856 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.3 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.2 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 22.9 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 31.6 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Pine City, MN | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 4.3 | 8.1 | 125 | 2.5 | 4.2 | 21.2 |
| Moderate | 1 | 4.3 | 21.6 | 218 | 4.3 | 16.5 | 20.1 |
| Middle | 6 | 26.1 | 24.1 | 660 | 13.1 | 23.5 | 23.4 |
| Upper | 13 | 56.5 | 27.6 | 3,642 | 72.5 | 37.2 | 35.2 |
| Unknown | 2 | 8.7 | 18.5 | 376 | 7.5 | 18.5 | 0.0 |
| Total | 23 | 100.0 | 100.0 | 5,021 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 13.1 | 0 | 0.0 | 7.9 | 21.2 |
| Moderate | 1 | 12.5 | 27.6 | 174 | 10.0 | 23.2 | 20.1 |
| Middle | 2 | 25.0 | 26.7 | 367 | 21.2 | 29.1 | 23.4 |
| Upper | 5 | 62.5 | 24.2 | 1,192 | 68.8 | 28.2 | 35.2 |
| Unknown | 0 | 0.0 | 8.4 | 0 | 0.0 | 11.7 | 0.0 |
| Total | 8 | 100.0 | 100.0 | 1,733 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 8.2 | 0 | 0.0 | 6.0 | 21.2 |
| Moderate | 2 | 25.0 | 27.8 | 115 | 25.4 | 24.5 | 20.1 |
| Middle | 1 | 12.5 | 24.7 | 30 | 6.6 | 19.8 | 23.4 |
| Upper | 5 | 62.5 | 36.1 | 308 | 68.0 | 43.6 | 35.2 |
| Unknown | 0 | 0.0 | 3.1 | 0 | 0.0 | 6.1 | 0.0 |
| Total | 8 | 100.0 | 100.0 | 453 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 1 | 2.1 | 9.7 | 125 | 1.6 | 5.3 | 21.2 |
| Moderate | 6 | 12.8 | 24.1 | 535 | 6.8 | 18.5 | 20.1 |
| Middle | 11 | 23.4 | 25.0 | 1,167 | 14.7 | 24.9 | 23.4 |
| Upper | 27 | 57.4 | 27.3 | 5,712 | 72.2 | 35.1 | 35.2 |
| Unknown | 2 | 4.3 | 13.8 | 376 | 4.8 | 16.2 | 0.0 |
| Total | 47 | 100.0 | 100.0 | 7,915 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|--------------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 2.9 | 0 | 0.0 | 5.1 | 21.2 |
| Moderate | 0 | 0.0 | 29.4 | 0 | 0.0 | 27.8 | 20.1 |
| Middle | 0 | 0.0 | 20.6 | 0 | 0.0 | 27.7 | 23.4 |
| Upper | 0 | 0.0 | 38.2 | 0 | 0.0 | 33.8 | 35.2 |
| Unknown | 0 | 0.0 | 8.8 | 0 | 0.0 | 5.5 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 12.2 | 0 | 0.0 | 5.2 | 21.2 |
| Moderate | 2 | 25.0 | 26.7 | 28 | 4.0 | 17.2 | 20.1 |
| Middle | 2 | 25.0 | 30.0 | 110 | 15.5 | 27.3 | 23.4 |
| Upper | 4 | 50.0 | 31.1 | 570 | 80.5 | 50.3 | 35.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Total | 8 | 100.0 | 100.0 | 708 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 21.2 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 20.1 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.4 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 35.2 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| | | | | | | | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 80 | 72.7 | 51.5 | 2,623 | 27.4 | 25.3 | 91.9 |
| Over \$1 Million | 29 | 26.4 | | 6,915 | 72.3 | | 5.4 |
| Revenue Unknown | 1 | 0.9 | | 29 | 0.3 | | 2.7 |
| Total | 110 | 100.0 | | 9,567 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 89 | 80.9 | 91.6 | 2,409 | 25.2 | 32.1 | |
| \$100,001 - \$250,000 | 10 | 9.1 | 4.1 | 1,538 | 16.1 | 14.8 | |
| \$250,001 - \$1 Million | 11 | 10.0 | 4.3 | 5,620 | 58.7 | 53.1 | |
| Total | 110 | 100.0 | 100.0 | 9,567 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 77 | 96.3 | | 1,850 | 70.5 | | |
| \$100,001 - \$250,000 | 2 | 2.5 | | 273 | 10.4 | | |
| \$250,001 - \$1 Million | 1 | 1.3 | | 500 | 19.1 | | |
| Total | 80 | 100.0 | | 2,623 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 23 | 67.6 | 56.5 | 1,283 | 26.8 | 40.9 | 91.9 |
| Over \$1 Million | 11 | 32.4 | | 3,511 | 73.2 | | 5.5 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 2.6 |
| Total | 34 | 100.0 | | 4,794 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 21 | 61.8 | 92.7 | 880 | 18.4 | 41.1 | |
| \$100,001 - \$250,000 | 7 | 20.6 | 4.5 | 1,400 | 29.2 | 22.7 | |
| \$250,001 - \$1 Million | 6 | 17.6 | 2.8 | 2,514 | 52.4 | 36.3 | |
| Total | 34 | 100.0 | 100.0 | 4,794 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 20 | 87.0 | | 833 | 64.9 | | |
| \$100,001 - \$250,000 | 3 | 13.0 | | 450 | 35.1 | | |
| \$250,001 - \$1 Million | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 23 | 100.0 | | 1,283 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 77 | 100.0 | 80.3 | 1,510 | 100.0 | 70.3 | 98.2 |
| Over \$1 Million | 0 | 0.0 | | 0 | 0.0 | | 1.8 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 77 | 100.0 | | 1,510 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 76 | 98.7 | 94.4 | 1,345 | 89.1 | 61.3 | |
| \$100,001 - \$250,000 | 1 | 1.3 | 4.9 | 165 | 10.9 | 29.1 | |
| \$250,001 - \$500,000 | 0 | 0.0 | 0.7 | 0 | 0.0 | 9.6 | |
| Total | 77 | 100.0 | 100.0 | 1,510 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 76 | 98.7 | | 1,345 | 89.1 | | |
| \$100,001 - \$250,000 | 1 | 1.3 | | 165 | 10.9 | | |
| \$250,001 - \$500,000 | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 77 | 100.0 | | 1,510 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Pine City, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 18 | 90.0 | 76.0 | 1,244 | 83.0 | 71.5 | 98.2 |
| Over \$1 Million | 1 | 5.0 | | 55 | 3.7 | | 1.8 |
| Revenue Unknown | 1 | 5.0 | | 200 | 13.3 | | 0.0 |
| Total | 20 | 100.0 | | 1,499 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 14 | 70.0 | 89.0 | 695 | 46.4 | 58.5 | |
| \$100,001 - \$250,000 | 6 | 30.0 | 11.0 | 804 | 53.6 | 41.5 | |
| \$250,001 - \$500,000 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 20 | 100.0 | 100.0 | 1,499 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 13 | 72.2 | | 640 | 51.4 | | |
| \$100,001 - \$250,000 | 5 | 27.8 | | 604 | 48.6 | | |
| \$250,001 - \$500,000 | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 18 | 100.0 | | 1,244 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 8 | 42.1 | 41.2 | 902 | 29.8 | 35.5 | 31.9 |
| Middle | 11 | 57.9 | 58.8 | 2,123 | 70.2 | 64.5 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 19 | 100.0 | 100.0 | 3,025 | 100.0 | 100.0 | 100.0 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|--------|-------|-------|------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 7 | 18.4 | 27.3 | 1,277 | 20.3 | 24.8 | 31.9 |
| Middle | 31 | 81.6 | 72.7 | 5,017 | 79.7 | 75.2 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 38 | 100.0 | 100.0 | 6,294 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 50.0 | 31.5 | 120 | 88.9 | 30.7 | 31.9 |
| Middle | 1 | 50.0 | 68.5 | 15 | 11.1 | 69.3 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 2 | 100.0 | 100.0 | 135 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 33.3 | 0 | 0.0 | 77.7 | 89.9 |
| Middle | 1 | 100.0 | 66.7 | 203 | 100.0 | 22.3 | 10.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 203 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 19 | 26.8 | 32.8 | 2,701 | 25.7 | 30.2 | 31.9 |
| Middle | 52 | 73.2 | 67.2 | 7,812 | 74.3 | 69.8 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 71 | 100.0 | 100.0 | 10,513 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 13.0 | 0 | 0.0 | 9.5 | 31.9 |
| Middle | 0 | 0.0 | 87.0 | 0 | 0.0 | 90.5 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 27.3 | 24.5 | 402 | 47.0 | 30.6 | 31.9 |
| Middle | 8 | 72.7 | 75.5 | 454 | 53.0 | 69.4 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 11 | 100.0 | 100.0 | 856 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 31.3 | 0 | 0.0 | 21.5 | 31.9 |
| Middle | 0 | 0.0 | 68.8 | 0 | 0.0 | 78.5 | 68.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ##% | ##% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 6 | 26.1 | 31.7 | 917 | 18.3 | 27.5 | 25.9 |
| Middle | 17 | 73.9 | 68.3 | 4,104 | 81.7 | 72.5 | 74.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 23 | 100.0 | 100.0 | 5,021 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 12.5 | 24.2 | 117 | 6.8 | 24.5 | 25.9 |
| Middle | 7 | 87.5 | 75.8 | 1,616 | 93.2 | 75.5 | 74.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 8 | 100.0 | 100.0 | 1,733 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 24.7 | 0 | 0.0 | 28.3 | 25.9 |
| Middle | 8 | 100.0 | 75.3 | 453 | 100.0 | 71.7 | 74.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 8 | 100.0 | 100.0 | 453 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 14.3 | 0 | 0.0 | 38.6 | 48.5 |
| Middle | 1 | 100.0 | 85.7 | 250 | 100.0 | 61.4 | 51.5 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 250 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 8 | 16.7 | 28.9 | 1,050 | 12.9 | 27.1 | 25.9 |
| Middle | 40 | 83.3 | 71.1 | 7,115 | 87.1 | 72.9 | 74.1 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|-------|-------|-------|-------|
| Assessment Area: Pine City, MN | | | | | | | |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 48 | 100.0 | 100.0 | 8,165 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 20.6 | 0 | 0.0 | 18.7 | 25.9 |
| Middle | 0 | 0.0 | 79.4 | 0 | 0.0 | 81.3 | 74.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 12.5 | 37.8 | 16 | 2.3 | 33.3 | 25.9 |
| Middle | 7 | 87.5 | 62.2 | 692 | 97.7 | 66.7 | 74.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 8 | 100.0 | 100.0 | 708 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 16.7 | 0 | 0.0 | 20.6 | 25.9 |
| Middle | 0 | 0.0 | 83.3 | 0 | 0.0 | 79.4 | 74.1 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 46 | 41.8 | 38.5 | 5,490 | 57.4 | 53.5 | 42.0 |
| Middle | 64 | 58.2 | 59.2 | 4,077 | 42.6 | 46.1 | 58.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 2.3 | 0 | 0.0 | 0.5 | |
| Total | 110 | 100.0 | 100.0 | 9,567 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------|
| Assessment Area: Pine City, MN | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 2.9 | 23.7 | 160 | 3.3 | 14.5 | 29.6 |
| Middle | 33 | 97.1 | 75.6 | 4,634 | 96.7 | 85.2 | 70.4 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.4 | |
| Total | 34 | 100.0 | 100.0 | 4,794 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Pine City, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 5 | 6.5 | 16.9 | 55 | 3.6 | 26.0 | 33.5 |
| Middle | 72 | 93.5 | 83.1 | 1,455 | 96.4 | 74.0 | 66.5 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 77 | 100.0 | 100.0 | 1,510 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Pine City, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 5.0 | 16.9 | 20 | 1.3 | 20.4 | 28.2 |
| Middle | 19 | 95.0 | 83.1 | 1,479 | 98.7 | 79.6 | 71.8 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 20 | 100.0 | 100.0 | 1,499 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Pine City, MN, Assessment Area Demographic Data | | | | | | | | |
|--|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 2,418 | 21.2 |
| Moderate | 4 | 30.8 | 3,098 | 27.2 | 226 | 7.3 | 2,287 | 20.1 |
| Middle | 9 | 69.2 | 8,290 | 72.8 | 447 | 5.4 | 2,669 | 23.4 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 4,014 | 35.2 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 13 | 100.0 | 11,388 | 100.0 | 673 | 5.9 | 11,388 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 7,923 | 3,783 | 25.9 | 47.7 | 1,334 | 16.8 | 2,806 | 35.4 |
| Middle | 17,734 | 10,843 | 74.1 | 61.1 | 1,803 | 10.2 | 5,088 | 28.7 |
| Upper | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 25,657 | 14,626 | 100.0 | 57.0 | 3,137 | 12.2 | 7,894 | 30.8 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 516 | 29.6 | 456 | 28.5 | 40 | 42.1 | 20 | 43.5 |
| Middle | 1,226 | 70.4 | 1,145 | 71.5 | 55 | 57.9 | 26 | 56.5 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 1,742 | 100.0 | 1,601 | 100.0 | 95 | 100.0 | 46 | 100.0 |
| Percentage of Total Businesses: | | | | 91.9 | | 5.5 | | 2.6 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 46 | 28.2 | 43 | 26.9 | 3 | 100.0 | 0 | 0.0 |

| 2022 Pine City, MN, Assessment Area Demographic Data | | | | | | | | |
|---|-----|-------|-----|-------|---|-------|---|-----|
| Middle | 117 | 71.8 | 117 | 73.1 | 0 | 0.0 | 0 | 0.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 163 | 100.0 | 160 | 100.0 | 3 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.2 | | 1.8 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: St. Cloud MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 79 | 95.2 | 74.1 | 1,874 | 89.8 | 63.6 | 98.6 |
| Over \$1 Million | 3 | 3.6 | | 154 | 7.4 | | 1.4 |
| Revenue Unknown | 1 | 1.2 | | 60 | 2.9 | | 0.0 |
| Total | 83 | 100.0 | | 2,088 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 81 | 97.6 | 89.2 | 1,638 | 78.4 | 44.9 | |
| \$100,001 - \$250,000 | 2 | 2.4 | 7.9 | 450 | 21.6 | 31.3 | |
| \$250,001 - \$500,000 | 0 | 0.0 | 2.9 | 0 | 0.0 | 23.7 | |
| Total | 83 | 100.0 | 100.0 | 2,088 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 77 | 97.5 | | 1,424 | 76.0 | | |
| \$100,001 - \$250,000 | 2 | 2.5 | | 450 | 24.0 | | |
| \$250,001 - \$500,000 | 0 | 0.0 | | 0 | 0.0 | | |
| Total | 79 | 100.0 | | 1,874 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: St. Cloud MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 21 | 100.0 | 56.5 | 1,476 | 100.0 | 56.4 | 98.7 |
| Over \$1 Million | 0 | 0.0 | | 0 | 0.0 | | 1.3 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 21 | 100.0 | | 1,476 | 100.0 | | |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 19 | 90.5 | 83.5 | 809 | 54.8 | 36.2 | |
| \$100,001 - \$250,000 | 1 | 4.8 | 9.4 | 200 | 13.6 | 23.2 | |
| \$250,001 - \$500,000 | 1 | 4.8 | 7.1 | 467 | 31.6 | 40.6 | |
| Total | 21 | 100.0 | 100.0 | 1,476 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 19 | 90.5 | | 809 | 54.8 | | |
| \$100,001 - \$250,000 | 1 | 4.8 | | 200 | 13.6 | | |
| \$250,001 - \$500,000 | 1 | 4.8 | | 467 | 31.6 | | |
| Total | 21 | 100.0 | | 1,476 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: St. Cloud MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.7 |
| Middle | 83 | 100.0 | 100.0 | 2,088 | 100.0 | 100.0 | 99.3 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 83 | 100.0 | 100.0 | 2,088 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: St. Cloud MN MSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 3.5 | 0 | 0.0 | 11.1 | 4.6 |
| Middle | 19 | 90.5 | 87.1 | 1,238 | 83.9 | 80.0 | 86.1 |
| Upper | 2 | 9.5 | 9.4 | 238 | 16.1 | 8.9 | 9.3 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 21 | 100.0 | 100.0 | 1,476 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 St. Cloud MSA Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-----------------------|-----------------------------|--------------|---|-----------|------------------------------|--------------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 1,850 | 18.3 |
| Moderate | 3 | 30.0 | 2,933 | 29.1 | 205 | 7.0 | 2,248 | 22.3 |
| Middle | 6 | 60.0 | 6,210 | 61.6 | 146 | 2.4 | 2,436 | 24.1 |
| Upper | 1 | 10.0 | 944 | 9.4 | 26 | 2.8 | 3,553 | 35.2 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 10 | 100.0 | 10,087 | 100.0 | 377 | 3.7 | 10,087 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 6,456 | 2,594 | 23.9 | 40.2 | 3,591 | 55.6 | 271 | 4.2 |
| Middle | 9,521 | 7,182 | 66.2 | 75.4 | 1,872 | 19.7 | 467 | 4.9 |
| Upper | 1,309 | 1,065 | 9.8 | 81.4 | 178 | 13.6 | 66 | 5.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 17,286 | 10,841 | 100.0 | 62.7 | 5,641 | 32.6 | 804 | 4.7 |

| 2022 St. Cloud MSA Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-------|------------------------------------|-------|------------------|-------|----------------------|-------|
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 469 | 27.6 | 409 | 27.1 | 58 | 36.5 | 2 | 7.4 |
| Middle | 1,047 | 61.7 | 945 | 62.5 | 81 | 50.9 | 21 | 77.8 |
| Upper | 181 | 10.7 | 157 | 10.4 | 20 | 12.6 | 4 | 14.8 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 1,697 | 100.0 | 1,511 | 100.0 | 159 | 100.0 | 27 | 100.0 |
| Percentage of Total Businesses: | | | | 89.0 | | 9.4 | | 1.6 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 7 | 4.6 | 7 | 4.7 | 0 | 0.0 | 0 | 0.0 |
| Middle | 130 | 86.1 | 129 | 86.6 | 1 | 50.0 | 0 | 0.0 |
| Upper | 14 | 9.3 | 13 | 8.7 | 1 | 50.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 151 | 100.0 | 149 | 100.0 | 2 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 98.7 | | 1.3 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|--|--------------------------|-------|------|---------|-------|------|---------------|
| Assessment Area: Warren-Oslo, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 82 | 93.2 | 69.7 | 6,992 | 89.7 | 65.8 | 99.2 |
| Over \$1 Million | 4 | 4.5 | | 558 | 7.2 | | 0.8 |
| Revenue Unknown | 2 | 2.3 | | 244 | 3.1 | | 0.0 |
| Total | 88 | 100.0 | | 7,794 | 100.0 | | 100.0 |

| Distribution of 2021 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|----|-------|-------|-------|-------|-------|--|
| Assessment Area: Warren-Oslo, MN | | | | | | | |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 66 | 75.0 | 75.7 | 1,970 | 25.3 | 22.1 | |
| \$100,001 - \$250,000 | 9 | 10.2 | 12.3 | 1,438 | 18.5 | 24.9 | |
| \$250,001 - \$500,000 | 13 | 14.8 | 12.0 | 4,386 | 56.3 | 53.0 | |
| Total | 88 | 100.0 | 100.0 | 7,794 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 62 | 75.6 | | 1,834 | 26.2 | | |
| \$100,001 - \$250,000 | 8 | 9.8 | | 1,197 | 17.1 | | |
| \$250,001 - \$500,000 | 12 | 14.6 | | 3,961 | 56.7 | | |
| Total | 82 | 100.0 | | 6,992 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Revenue Size of Farms | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|---------------|
| Assessment Area: Warren-Oslo, MN | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 22 | 91.7 | 49.6 | 4,092 | 87.3 | 53.3 | 99.2 |
| Over \$1 Million | 2 | 8.3 | | 595 | 12.7 | | 0.8 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 0.0 |
| Total | 24 | 100.0 | | 4,687 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 7 | 29.2 | 63.8 | 443 | 9.5 | 17.9 | |
| \$100,001 - \$250,000 | 9 | 37.5 | 19.1 | 1,488 | 31.7 | 28.0 | |
| \$250,001 - \$500,000 | 8 | 33.3 | 17.1 | 2,756 | 58.8 | 54.1 | |
| Total | 24 | 100.0 | 100.0 | 4,687 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 7 | 31.8 | | 443 | 10.8 | | |
| \$100,001 - \$250,000 | 8 | 36.4 | | 1,318 | 32.2 | | |
| \$250,001 - \$500,000 | 7 | 31.8 | | 2,331 | 57.0 | | |
| Total | 22 | 100.0 | | 4,092 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Warren-Oslo, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 88 | 100.0 | 100.0 | 7,794 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 88 | 100.0 | 100.0 | 7,794 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Warren-Oslo, MN | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|------------------|
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Farms % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Middle | 24 | 100.0 | 100.0 | 4,687 | 100.0 | 100.0 | 100.0 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 24 | 100.0 | 100.0 | 4,687 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Warren-Oslo, MN, Assessment Area Demographic Data | | | | | | | | |
|--|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 299 | 15.2 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 409 | 20.8 |
| Middle | 3 | 100.0 | 1,964 | 100.0 | 97 | 4.9 | 457 | 23.3 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 799 | 40.7 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 3 | 100.0 | 1,964 | 100.0 | 97 | 4.9 | 1,964 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 3,513 | 2,419 | 100.0 | 68.9 | 571 | 16.3 | 523 | 14.9 |
| Upper | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 3,513 | 2,419 | 100.0 | 68.9 | 571 | 16.3 | 523 | 14.9 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 343 | 100.0 | 278 | 100.0 | 38 | 100.0 | 27 | 100.0 |
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 343 | 100.0 | 278 | 100.0 | 38 | 100.0 | 27 | 100.0 |
| Percentage of Total Businesses: | | | | 81.0 | | 11.1 | | 7.9 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 126 | 100.0 | 125 | 100.0 | 1 | 100.0 | 0 | 0.0 |

| 2022 Warren-Oslo, MN, Assessment Area Demographic Data | | | | | | | | |
|---|-----|-------|-----|-------|---|-------|---|-----|
| Upper | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 126 | 100.0 | 125 | 100.0 | 1 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 99.2 | | 0.8 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Eau Claire MSA | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 16.7 | 9.2 | 246 | 8.4 | 5.5 | 18.1 |
| Moderate | 2 | 16.7 | 24.7 | 368 | 12.6 | 18.9 | 17.6 |
| Middle | 2 | 16.7 | 22.9 | 487 | 16.6 | 22.0 | 23.9 |
| Upper | 4 | 33.3 | 30.8 | 1,355 | 46.3 | 42.1 | 40.3 |
| Unknown | 2 | 16.7 | 12.4 | 470 | 16.1 | 11.5 | 0.0 |
| Total | 12 | 100.0 | 100.0 | 2,926 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 2 | 8.7 | 9.0 | 272 | 5.2 | 5.4 | 18.1 |
| Moderate | 4 | 17.4 | 20.7 | 504 | 9.5 | 15.8 | 17.6 |
| Middle | 2 | 8.7 | 25.8 | 434 | 8.2 | 24.1 | 23.9 |
| Upper | 14 | 60.9 | 32.2 | 3,998 | 75.7 | 41.6 | 40.3 |
| Unknown | 1 | 4.3 | 12.3 | 73 | 1.4 | 13.1 | 0.0 |
| Total | 23 | 100.0 | 100.0 | 5,281 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 6.8 | 0 | 0.0 | 3.4 | 18.1 |
| Moderate | 0 | 0.0 | 18.0 | 0 | 0.0 | 13.2 | 17.6 |
| Middle | 0 | 0.0 | 27.8 | 0 | 0.0 | 24.4 | 23.9 |
| Upper | 0 | 0.0 | 45.4 | 0 | 0.0 | 56.5 | 40.3 |
| Unknown | 0 | 0.0 | 2.0 | 0 | 0.0 | 2.6 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 5 | 13.9 | 8.8 | 618 | 7.4 | 5.4 | 18.1 |
| Moderate | 6 | 16.7 | 21.7 | 872 | 10.5 | 17.1 | 17.6 |
| Middle | 4 | 11.1 | 24.8 | 921 | 11.1 | 23.2 | 23.9 |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|-------|-------|-------|-------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Upper | 18 | 50.0 | 33.2 | 5,353 | 64.4 | 42.2 | 40.3 |
| Unknown | 3 | 8.3 | 11.6 | 543 | 6.5 | 12.1 | 0.0 |
| Total | 36 | 100.0 | 100.0 | 8,307 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |
| Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 6.9 | 0 | 0.0 | 5.3 | 18.1 |
| Moderate | 0 | 0.0 | 15.8 | 0 | 0.0 | 11.7 | 17.6 |
| Middle | 0 | 0.0 | 24.0 | 0 | 0.0 | 19.3 | 23.9 |
| Upper | 0 | 0.0 | 48.4 | 0 | 0.0 | 59.6 | 40.3 |
| Unknown | 0 | 0.0 | 4.9 | 0 | 0.0 | 4.1 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 100.0 | 8.4 | 100 | 100.0 | 5.4 | 18.1 |
| Moderate | 0 | 0.0 | 22.7 | 0 | 0.0 | 20.6 | 17.6 |
| Middle | 0 | 0.0 | 27.9 | 0 | 0.0 | 31.4 | 23.9 |
| Upper | 0 | 0.0 | 29.2 | 0 | 0.0 | 33.9 | 40.3 |
| Unknown | 0 | 0.0 | 11.7 | 0 | 0.0 | 8.6 | 0.0 |
| Total | 1 | 100.0 | 100.0 | 100 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 18.1 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 17.6 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.9 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 40.3 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 15.4 | 8.0 | 168 | 3.6 | 4.6 | 17.5 |
| Moderate | 3 | 23.1 | 25.5 | 502 | 10.7 | 19.0 | 17.7 |
| Middle | 0 | 0.0 | 27.1 | 0 | 0.0 | 26.6 | 24.9 |
| Upper | 5 | 38.5 | 26.8 | 3,621 | 76.9 | 37.2 | 39.9 |
| Unknown | 3 | 23.1 | 12.6 | 420 | 8.9 | 12.6 | 0.0 |
| Total | 13 | 100.0 | 100.0 | 4,711 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 1 | 12.5 | 14.2 | 47 | 1.6 | 8.7 | 17.5 |
| Moderate | 1 | 12.5 | 26.6 | 290 | 9.6 | 22.0 | 17.7 |
| Middle | 1 | 12.5 | 23.1 | 554 | 18.4 | 23.2 | 24.9 |
| Upper | 3 | 37.5 | 25.8 | 1,290 | 42.9 | 35.3 | 39.9 |
| Unknown | 2 | 25.0 | 10.3 | 825 | 27.4 | 10.8 | 0.0 |
| Total | 8 | 100.0 | 100.0 | 3,006 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 7.6 | 0 | 0.0 | 5.7 | 17.5 |
| Moderate | 1 | 16.7 | 19.5 | 15 | 2.0 | 13.1 | 17.7 |
| Middle | 1 | 16.7 | 26.8 | 100 | 13.1 | 22.3 | 24.9 |
| Upper | 3 | 50.0 | 42.4 | 270 | 35.3 | 52.9 | 39.9 |
| Unknown | 1 | 16.7 | 3.7 | 380 | 49.7 | 6.1 | 0.0 |
| Total | 6 | 100.0 | 100.0 | 765 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | |
| Low | 4 | 13.8 | 10.2 | 382 | 4.4 | 5.9 | 17.5 |
| Moderate | 5 | 17.2 | 24.1 | 807 | 9.3 | 19.3 | 17.7 |
| Middle | 2 | 6.9 | 25.6 | 654 | 7.5 | 25.5 | 24.9 |
| Upper | 12 | 41.4 | 30.0 | 5,216 | 60.1 | 37.8 | 39.9 |
| Unknown | 6 | 20.7 | 10.1 | 1,625 | 18.7 | 11.5 | 0.0 |
| Total | 29 | 100.0 | 100.0 | 8,684 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |
| Multifamily loans are not included in the borrower distribution analysis. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|-----------------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Borrower Income Level | Bank And Aggregate Loans | | | | | | Families by Family Income % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 12.6 | 0 | 0.0 | 7.6 | 17.5 |
| Moderate | 0 | 0.0 | 16.8 | 0 | 0.0 | 13.8 | 17.7 |
| Middle | 0 | 0.0 | 25.0 | 0 | 0.0 | 26.0 | 24.9 |
| Upper | 0 | 0.0 | 41.8 | 0 | 0.0 | 47.4 | 39.9 |
| Unknown | 0 | 0.0 | 3.9 | 0 | 0.0 | 5.1 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 50.0 | 13.3 | 167 | 82.7 | 17.2 | 17.5 |
| Moderate | 0 | 0.0 | 26.7 | 0 | 0.0 | 19.7 | 17.7 |
| Middle | 0 | 0.0 | 20.0 | 0 | 0.0 | 23.6 | 24.9 |
| Upper | 1 | 50.0 | 25.0 | 35 | 17.3 | 28.9 | 39.9 |
| Unknown | 0 | 0.0 | 15.0 | 0 | 0.0 | 10.6 | 0.0 |
| Total | 2 | 100.0 | 100.0 | 202 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 17.5 |
| Moderate | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 17.7 |
| Middle | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 24.9 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 39.9 |
| Unknown | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0.0 |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 40 | 54.8 | 47.1 | 6,863 | 52.8 | 36.8 | 91.0 |
| Over \$1 Million | 26 | 35.6 | | 5,566 | 42.8 | | 8.1 |
| Revenue Unknown | 7 | 9.6 | | 578 | 4.4 | | 1.0 |
| Total | 73 | 100.0 | | 13,007 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 38 | 52.1 | 92.7 | 1,872 | 14.4 | 29.7 | |
| \$100,001 - \$250,000 | 22 | 30.1 | 3.4 | 3,705 | 28.5 | 13.2 | |
| \$250,001 - \$1 Million | 13 | 17.8 | 3.9 | 7,430 | 57.1 | 57.1 | |
| Total | 73 | 100.0 | 100.0 | 13,007 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 24 | 60.0 | | 1,025 | 14.9 | | |
| \$100,001 - \$250,000 | 9 | 22.5 | | 1,475 | 21.5 | | |
| \$250,001 - \$1 Million | 7 | 17.5 | | 4,363 | 63.6 | | |
| Total | 40 | 100.0 | | 6,863 | 100.0 | | |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Revenue Size of Businesses | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | \$% | \$% | |
| By Revenue | | | | | | | |
| \$1 Million or Less | 21 | 63.6 | 47.4 | 3,218 | 49.4 | 32.1 | 91.1 |
| Over \$1 Million | 12 | 36.4 | | 3,299 | 50.6 | | 7.9 |
| Revenue Unknown | 0 | 0.0 | | 0 | 0.0 | | 1.0 |
| Total | 33 | 100.0 | | 6,517 | 100.0 | | 100.0 |
| By Loan Size | | | | | | | |
| \$100,000 or Less | 13 | 39.4 | 91.8 | 742 | 11.4 | 33.3 | |
| \$100,001 - \$250,000 | 13 | 39.4 | 3.8 | 2,528 | 38.8 | 15.5 | |
| \$250,001 - \$1 Million | 7 | 21.2 | 4.5 | 3,247 | 49.8 | 51.1 | |
| Total | 33 | 100.0 | 100.0 | 6,517 | 100.0 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | |
| \$100,000 or Less | 12 | 57.1 | | 642 | 20.0 | | |
| \$100,001 - \$250,000 | 6 | 28.6 | | 1,075 | 33.4 | | |
| \$250,001 - \$1 Million | 3 | 14.3 | | 1,501 | 46.6 | | |
| Total | 21 | 100.0 | | 3,218 | 100.0 | | |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | \$% | \$% | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 1 | 8.3 | 13.2 | 140 | 4.8 | 8.9 | 10.1 |
| Middle | 11 | 91.7 | 78.0 | 2,786 | 95.2 | 78.9 | 79.8 |
| Upper | 0 | 0.0 | 8.9 | 0 | 0.0 | 12.2 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 12 | 100.0 | 100.0 | 2,926 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 4 | 17.4 | 9.2 | 389 | 7.4 | 6.9 | 10.1 |
| Middle | 19 | 82.6 | 80.6 | 4,892 | 92.6 | 79.6 | 79.8 |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|-------|-------|-------|------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Upper | 0 | 0.0 | 10.1 | 0 | 0.0 | 13.6 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 23 | 100.0 | 100.0 | 5,281 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 8.1 | 0 | 0.0 | 6.7 | 10.1 |
| Middle | 0 | 0.0 | 78.0 | 0 | 0.0 | 79.9 | 79.8 |
| Upper | 0 | 0.0 | 13.9 | 0 | 0.0 | 13.4 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 18.2 | 0 | 0.0 | 23.5 | 25.8 |
| Middle | 0 | 0.0 | 65.2 | 0 | 0.0 | 55.6 | 61.9 |
| Upper | 0 | 0.0 | 16.7 | 0 | 0.0 | 20.9 | 12.3 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 5 | 13.9 | 10.6 | 529 | 6.4 | 9.6 | 10.1 |
| Middle | 31 | 86.1 | 79.3 | 7,778 | 93.6 | 76.4 | 79.8 |
| Upper | 0 | 0.0 | 10.1 | 0 | 0.0 | 14.0 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 36 | 100.0 | 100.0 | 8,307 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 6.3 | 0 | 0.0 | 3.6 | 10.1 |
| Middle | 0 | 0.0 | 81.9 | 0 | 0.0 | 78.0 | 79.8 |
| Upper | 0 | 0.0 | 11.8 | 0 | 0.0 | 18.4 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 12.3 | 0 | 0.0 | 6.1 | 10.1 |
| Middle | 1 | 100.0 | 76.6 | 100 | 100.0 | 79.1 | 79.8 |
| Upper | 0 | 0.0 | 11.0 | 0 | 0.0 | 14.8 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 1 | 100.0 | 100.0 | 100 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 18.8 | 0 | 0.0 | 18.1 | 10.1 |
| Middle | 0 | 0.0 | 75.0 | 0 | 0.0 | 77.1 | 79.8 |
| Upper | 0 | 0.0 | 6.3 | 0 | 0.0 | 4.8 | 10.1 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data | | | | | | | |
| 2011-2015 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|--------------------------|------|------|---------|------|------|---------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | ## | ## | \$(000) | % | % | |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 3 | 23.1 | 16.2 | 824 | 17.5 | 13.0 | 12.0 |
| Middle | 8 | 61.5 | 62.7 | 3,617 | 76.8 | 62.5 | 64.2 |
| Upper | 2 | 15.4 | 21.1 | 270 | 5.7 | 24.6 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 | | | | | | | |
|--|----|-------|-------|-------|-------|-------|------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 13 | 100.0 | 100.0 | 4,711 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 2 | 25.0 | 16.4 | 395 | 13.1 | 11.7 | 12.0 |
| Middle | 4 | 50.0 | 60.4 | 1,610 | 53.6 | 63.0 | 64.2 |
| Upper | 2 | 25.0 | 23.2 | 1,001 | 33.3 | 25.4 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 8 | 100.0 | 100.0 | 3,006 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 10.7 | 0 | 0.0 | 8.7 | 12.0 |
| Middle | 3 | 50.0 | 64.3 | 495 | 64.7 | 67.4 | 64.2 |
| Upper | 3 | 50.0 | 25.0 | 270 | 35.3 | 23.9 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 6 | 100.0 | 100.0 | 765 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | Multi-family Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 15.8 | 0 | 0.0 | 24.5 | 22.6 |
| Middle | 0 | 0.0 | 45.6 | 0 | 0.0 | 47.9 | 46.4 |
| Upper | 0 | 0.0 | 38.6 | 0 | 0.0 | 27.6 | 30.9 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | Owner Occupied Units % |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 5 | 17.2 | 15.2 | 1,219 | 14.0 | 14.7 | 12.0 |
| Middle | 17 | 58.6 | 61.4 | 5,924 | 68.2 | 59.7 | 64.2 |
| Upper | 7 | 24.1 | 23.4 | 1,541 | 17.7 | 25.6 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 29 | 100.0 | 100.0 | 8,684 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 | | | | | | | |
|--|--------------------------|-------|-------|---------|-------|-------|---------------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Owner Occupied Units % |
| | Bank | | Agg | Bank | | Agg | |
| | # | #% | #% | \$(000) | % | % | |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 13.1 | 0 | 0.0 | 9.8 | 12.0 |
| Middle | 0 | 0.0 | 57.2 | 0 | 0.0 | 58.0 | 64.2 |
| Upper | 0 | 0.0 | 29.6 | 0 | 0.0 | 32.2 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 11.7 | 0 | 0.0 | 13.2 | 12.0 |
| Middle | 2 | 100.0 | 66.7 | 202 | 100.0 | 63.0 | 64.2 |
| Upper | 0 | 0.0 | 21.7 | 0 | 0.0 | 23.8 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 2 | 100.0 | 100.0 | 202 | 100.0 | 100.0 | 100.0 |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 0 | 0.0 | 50.0 | 0 | 0.0 | 43.0 | 12.0 |
| Middle | 0 | 0.0 | 50.0 | 0 | 0.0 | 57.0 | 64.2 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 23.8 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data | | | | | | | |
| 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2021 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 13 | 17.8 | 14.8 | 1,519 | 11.7 | 13.2 | 20.1 |
| Middle | 50 | 68.5 | 68.4 | 10,385 | 79.8 | 70.5 | 68.4 |
| Upper | 10 | 13.7 | 16.2 | 1,103 | 8.5 | 16.2 | 11.5 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.5 | 0 | 0.0 | 0.1 | |
| Total | 73 | 100.0 | 100.0 | 13,007 | 100.0 | 100.0 | 100.0 |
| Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| Distribution of 2022 Small Business Lending By Income Level of Geography | | | | | | | |
|---|--------------------------|-------|-------|---------|-------|-------|--------------------|
| Assessment Area: Eau Claire MSA | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans | | | | | | Total Businesses % |
| | Bank | | Agg | Bank | | Agg | |
| | # | % | % | \$(000) | % | % | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Moderate | 9 | 27.3 | 17.6 | 1,277 | 19.6 | 24.8 | 19.9 |
| Middle | 16 | 48.5 | 57.0 | 2,834 | 43.5 | 50.1 | 57.8 |
| Upper | 8 | 24.2 | 25.1 | 2,406 | 36.9 | 25.0 | 22.4 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.0 |
| Tract-Unk | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.1 | |
| Total | 33 | 100.0 | 100.0 | 6,517 | 100.0 | 100.0 | 100.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | |

| 2022 Eau Claire MSA Assessment Area Demographic Data | | | | | | | | |
|--|--------------------|------|--------------------------|------|--|-----|---------------------------|------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 4,175 | 17.5 |
| Moderate | 3 | 13.6 | 3,131 | 13.1 | 234 | 7.5 | 4,226 | 17.7 |
| Middle | 13 | 59.1 | 14,825 | 62.1 | 723 | 4.9 | 5,935 | 24.9 |
| Upper | 6 | 27.3 | 5,916 | 24.8 | 241 | 4.1 | 9,536 | 39.9 |

| 2022 Eau Claire MSA Assessment Area Demographic Data | | | | | | | | |
|---|---------------------------|-----------------------|------------------------------------|-----------|------------------|-----------|----------------------|-----------|
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 22 | 100.0 | 23,872 | 100.0 | 1,198 | 5.0 | 23,872 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 7,130 | 3,198 | 12.0 | 44.9 | 3,514 | 49.3 | 418 | 5.9 |
| Middle | 25,383 | 17,132 | 64.2 | 67.5 | 6,756 | 26.6 | 1,495 | 5.9 |
| Upper | 11,906 | 6,358 | 23.8 | 53.4 | 4,644 | 39.0 | 904 | 7.6 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 44,419 | 26,688 | 100.0 | 60.1 | 14,914 | 33.6 | 2,817 | 6.3 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 847 | 19.9 | 764 | 19.7 | 81 | 24.0 | 2 | 4.7 |
| Middle | 2,463 | 57.8 | 2,260 | 58.2 | 171 | 50.6 | 32 | 74.4 |
| Upper | 953 | 22.4 | 858 | 22.1 | 86 | 25.4 | 9 | 20.9 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 4,263 | 100.0 | 3,882 | 100.0 | 338 | 100.0 | 43 | 100.0 |
| Percentage of Total Businesses: | | | | 91.1 | | 7.9 | | 1.0 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 5 | 2.7 | 5 | 2.7 | 0 | 0.0 | 0 | 0.0 |
| Middle | 128 | 68.8 | 127 | 68.6 | 1 | 100.0 | 0 | 0.0 |
| Upper | 53 | 28.5 | 53 | 28.6 | 0 | 0.0 | 0 | 0.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 186 | 100.0 | 185 | 100.0 | 1 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 99.5 | | 0.5 | | 0.0 |
| Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |