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August 11, 2026

Via Electronic Delivery

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Re: Proposed Acquisition of BNCCORP, INC. and Its National Bank Subsidiary, BNC National Bank, and Related Transactions by OppFi Inc.

Dear Mr. Koopmans, Mr. Hansen, and Ms. Kaemingk:

I write on behalf of our client, OppFi Inc. ("**OppFi**"), regarding the applications submitted on June 27, 2026 (the "**Applications**") to (1) the Board of Governors of the Federal Reserve System ("**Board**") and Federal Reserve Bank of Chicago ("**Reserve Bank**," and together with the Board, the "**Federal Reserve**") under Section 3 of the Bank Holding Company Act, (2) the Office of the Comptroller of the Currency ("**OCC**") under the Bank Merger Act, and (3) the Federal Deposit Insurance Corporation ("**FDIC**," and together with the Federal Reserve and OCC, the "**Agencies**") under the Bank Merger Act to acquire BNCCORP, INC. ("**BNCCORP**"), and indirectly, BNCCORP's wholly owned subsidiary, BNC National Bank (collectively, the

"**Acquisition**"). As a result of the Acquisition, BNC National Bank will relocate its main office to Utah, and will be renamed OppFi Bank, National Association ("**OppFi Bank**").

The Applications include a discussion of OppFi Bank's plans for compliance with the Community Reinvestment Act ("**CRA**"), and identify relevant facility-based assessment areas for OppFi Bank. These assessment areas are BNC National Bank's existing assessment areas in Arizona and North Dakota, plus a new assessment area in Utah corresponding to OppFi Bank's main office. Since filing the Application, OppFi and BNC National Bank have continued to assess how OppFi Bank can best meet the needs of the communities in which it will be located, in light of OppFi Bank's business model. Based upon those assessments, OppFi and BNC National Bank have determined that OppFi Bank will be able to make the greatest impact in its communities through implementation of a CRA strategic plan. OppFi Bank will work with community groups in its assessment areas (and other groups, as appropriate) to ascertain the needs of the community and how best to serve those needs, and will develop a strategic plan in consultation with community members and the OCC following the consummation of the Acquisition.

This letter is meant as an initial notification to the Agencies of a change in approach with respect to CRA issues. OppFi intends to submit a more comprehensive update to the Applications relating to the CRA no later than September 18.

* * * * *

OppFi appreciates the Agencies' review of the Applications, together with this update. Please feel free to contact me at michael.lewis@sidley.com or 202-736-8959 with any questions.

Very truly yours,

/s/ Michael D. Lewis

Michael D. Lewis
Partner

cc: Todd Schwartz, OppFi Inc.
Marv Gurevich, OppFi Inc.
Joshua Samek, Sidley Austin LLP
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