



PUBLIC DISCLOSURE

June 26, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank North
Charter Number 8476

600 Minnesota Ave.
Walker, MN 56484

Office of the Comptroller of the Currency

222 South Ninth Street
Suite 800
Minneapolis, MN 55402-3391

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 safe and sound operation of the institution. This evaluation is not, and should not 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.



INTERMEDIATE SMALL BANK

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**

The Lending Test is rated: Outstanding

The Community Development test is rated: Outstanding

The major factors that support this rating include:

- First National Bank North (FNBN) demonstrated excellent dispersion of loans throughout geographies of different income levels.
- FNBN demonstrated excellent distribution of loans to borrowers of different income levels.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans are originated or purchased inside the bank's assessment area (AA).
- FNBN's community development (CD) performance shows excellent responsiveness to AA needs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

FNBN's LTD ratio is reasonable given the bank's size, financial condition, and the credit needs of the AAs. FNBN's LTD ratio averaged 61.81 percent over the eight quarters included in the evaluation period. The ratio ranged from a low of 55.27 percent in the 4th quarter of 2021 to a high of 73.27 percent in the first quarter of 2020. FNBN ranked fourth amongst four similarly situated institutions. Similarly situated institutions are defined as institutions with similar asset-size located in the bank's AA. FNBN actively participates in selling home loans on the secondary market which is not reflected in the LTD ratio. Secondary market sales totaled \$79.5 million in 2020 and \$79.8 million in 2021.

Loan to Deposit Ratio		
Institution	Total Assets* (\$000s)	Average LTD Ratio
American National Bank of Minnesota	\$ 386,972	99.86%
The Citizens National Bank of Park Rapids	\$ 337,261	85.60%
Riverwood Bank	\$ 550,041	75.43%
First National Bank North	\$ 785,963	61.81%
<i>Source: Call Report data from 03/31/2020-12/31/2021.</i>		
<i>*Total Assets as of 12/31/2021.</i>		

Lending in Assessment Area

A majority of the bank's loans are inside its AAs. This assessment is based on our review of 20 home mortgage loans and 20 consumer loans originated between January 1, 2020 and December 21, 2021. FNBN originated and purchased 82.5 percent of its total loans by number and 72.6 percent by dollar inside its AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	14	70.0	6	30.0	20	2,599,954	69.9	1,120,610	30.1	3,720,564
Consumer	19	95.0	1	5.0	20	375,370	98.7	4,783	1.3	380,153
Total	33	82.5	7	17.5	40	2,975,324	72.6	1,125,393	27.4	4,100,718

Description of Institution

FNBN is a \$786 million community bank headquartered in Walker, MN. FNBN is wholly-owned by Walker Ban Co. (WBC), a one-bank holding company, also headquartered in Walker, MN. FNBN did not have merger or acquisition activity during the evaluation period. FNBN does not operate any subsidiaries or affiliates. FNBN operated nine branch locations and no deposit taking ATMs within northern Minnesota during the evaluation period. The bank has one AA, the MN Non-MSA AA.

FNBN is a full-service community bank offering a variety of loan and deposit products and a credit card product. The bank's primary focus is residential real estate and consumer lending. The bank offers a variety of traditional banking products and services, such as checking and savings accounts, certificates of deposit, as well as consumer and commercial lending products. Net loans and leases as of December 31, 2021, totaled 50.21 percent of total assets. The loan portfolio was comprised of 48 percent business loans, 39 percent home loans, 12 percent consumer loans, and less than one percent farm loans. Tier 1 capital totaled \$65.37 million as of December 31, 2021.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in the AA during the evaluation period. FNBN was rated Outstanding at the last CRA examination dated April 20, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this examination is January 1, 2020, to December 31, 2021. We reviewed a sample of home mortgage and consumer loans originated in the MN Non-MSA AA during the evaluation period. These products were selected based on an analysis of the bank's lending activity and the level of originations during the evaluation period. We also reviewed all CD loans, investments, donations, and services submitted by management as part of the evaluation. Demographic data is used in part to determine the bank's lending performance.

Selection of Areas for Full-Scope Review

The bank's only AA was selected for a full-scope review.

Ratings

The bank's overall rating is based solely on the State of MN rating, as it is the bank's only rating area. The state rating is based on performance in the bank's AA, MN Non-MSA AA. Refer to the "Scope" section for details regarding how the products were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans throughout census tracts (CTs) of different income levels is excellent.
- The distribution of loans to low-to-moderate income (LMI) borrowers is excellent.
- FNBN demonstrated excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.
- The bank received no CRA related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

The MN Non-MSA AA consists of Cass and Crow Wing Counties and four census tracts in Hubbard County. There are nine branches throughout northern Minnesota and no deposit taking ATMs. The main office is located in Walker, MN. Branches are located in Akeley, Longville, Hackensack, Backus, Remer, Pequot Lakes, Crosslake, and Baxter, MN.

Competition is significant within the AA. There are 19 institutions with 49 branches within the AA. According to the June 30, 2021 FDIC Deposit Market Share Report, FNBN ranks first with \$657.8 million or 21.76 percent of the deposit market share. Other large deposit shareholders include Bremer Bank, Deerwood Bank, and The Citizen National Bank of Park Rapids with a combined deposit market share of 54.12 percent.

The AA's economy was significantly impacted by the Covid-19 pandemic but is recovering. The unemployment rate for 2020 was at a high of 14.7 percent in Cass County, 12.2 percent in Crow Wing County, and 10.8 percent in Hubbard County. This compared to the state unemployment rate of 11 percent. By the end of 2021, unemployment rates stabilized at 5.4 percent for Cass County, 4.1 percent for Crow Wing County, and 5.3 percent for Hubbard County.

The pandemic brought in non-residents to the area. Some of those non-residents had accounts with FNBN which led to the increase of deposits at the bank and the ultimate purchase of second homes in the area. This resulted in an increase in housing costs. The median housing value was \$194 thousand compared to the weighted average median family income of \$72 thousand.

As part of this review, we contacted one community contact that represented a local government organization. The community contacted discussed that a large amount of houses are being purchased as secondary homes for non-residents, making it harder for permanent residents to obtain housing. As a

result, housing is a credit need in the area. The contact stated there are many opportunities for banks to be involved with community development projects within the area. The community contact stated that FNBN is very involved within the community, including economic development projects, volunteering, and community development donations.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	0.0	13.3	83.3	3.3	0.0
Population by Geography	103,204	0.0	12.5	82.4	5.1	0.0
Housing Units by Geography	74,103	0.0	13.7	82.5	3.8	0.0
Owner-Occupied Units by Geography	34,511	0.0	11.0	84.0	5.0	0.0
Occupied Rental Units by Geography	9,500	0.0	19.9	76.7	3.4	0.0
Vacant Units by Geography	30,092	0.0	15.0	82.5	2.5	0.0
Businesses by Geography	10,777	0.0	12.7	82.0	5.3	0.0
Farms by Geography	531	0.0	10.0	84.4	5.6	0.0
Family Distribution by Income Level	30,092	21.6	20.1	22.9	35.4	0.0
Household Distribution by Income Level	44,011	23.8	17.4	19.4	39.5	0.0
Median Family Income		\$72,400	Median Housing Value			\$193,989
			Median Gross Rent			\$721
			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Minnesota

The rating in the state of Minnesota is based on the performance of the bank's only AA, the MN Non-MSA AA. This AA included a full-scope review. Within the AA, we analyzed consumer loans and home mortgage loans as primary products. Home mortgage loans and consumer loans received the same weight in the Lending Test as home mortgage loans were the primary loan product by dollar volume and consumer loans were the primary loan product by number. During the evaluation period, home mortgage loans represented 14.43 percent of loan originations by number and 44.01 percent by dollar volume and consumer loans represented 71.71 percent of loan originations by number and 22.48 percent by dollar volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

The bank's performance under the Lending Test in Minnesota is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Minnesota is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in different income level CTs is excellent. The percentage of home mortgage loans made in moderate-income geographies exceeded both the percentage of owner-occupied housing units and aggregate lending percentage. There were no low-income CTs within the AA during the evaluation period.

Consumer Loans

Refer to Table U in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans in different income level CTs is excellent. The percentage of consumer loans made in moderate-income geographies exceeded the percentage of moderate-income households in the AA. There were no low income CTs within the AA during the evaluation period.

Lending Gap Analysis

There were no unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels.

Home Mortgage Loans

Refer to Table P in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home loans to borrowers of different income levels is excellent. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate lending percentage. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but significantly exceeded the aggregate lending percentage.

Consumer Loans

Refer to Table V in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is excellent. The percentage of consumer loans to LMI borrowers significantly exceeded the percentage of low-income households and exceeded the percentage of moderate-income households in the AA.

Responses to Complaints

FNBN did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Minnesota is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

The bank exhibits excellent responsiveness to CD lending needs in the state of MN. The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MN Non-MSA	223	100	20,956	100

FNBN originated a total of 223 CD loans totaling \$20.96 million or 32.1 percent of tier one capital during the evaluation period. The vast majority of CD loans were Paycheck Protection Program loans that supported job retention and economic development within the bank's AA. The remaining CD loans supported organizations that provided affordable housing or specific affordable housing projects or supported necessary community services to LMI individuals.

Number and Amount of Qualified Investments

The bank exhibits excellent responsiveness to qualified investments needs in the state. The Qualified Investment Table, shown below, set forth the information and data used to evaluate the bank's level of

qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MN Non-MSA	6	4,615	78	94	84	100	4,708	100	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments totaled \$4.7 million or 7.2 percent of capital during the evaluation period. Qualified investments consisted primarily of outstanding investments from the prior period totaling \$4.6 million. Three investments supported necessary community services through local Title 1 schools serving primarily LMI students. Two investments supported affordable housing to LMI families within moderate-income geographies. One investment supported revitalization through funding vital infrastructure to a moderate-income geography.

Qualified investments also included 78 donations totaling \$94 thousand made during the evaluation period. The majority of donations supported organizations providing community services to LMI individuals. The remaining donations included 22 donations to support revitalization in the AA, six donations to support economic development organizations, and two donations to support affordable housing organizations including one large donation to the Leech Lake Housing Authority and The Tribally Designated Housing Authority.

Extent to Which the Bank Provides Community Development Services

The bank exhibits excellent responsiveness to CD service needs in the state of Minnesota. During the evaluation period, 14 employees provided 775 hours to 15 qualified CD organizations benefitting the AA. The majority of services extended related to organizations providing community services targeting LMI individuals. Employees also provided services to organizations focused on economic development. Services provided in a leadership capacity accounted for the majority of hours.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2020 – 12/31/2021	
Bank Products Reviewed:	Home Mortgage Loans Consumer Loans CD Loans, Qualified Investments, and CD Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Minnesota		
MN Non-MSA	Full-Scope	Crow Wing and Cass Counties, four census tracts in Hubbard County (701.00,703.00, 704.00, 707.00)

Appendix B: Summary of MMSA and State Ratings

RATINGS – First National Bank North			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
FNBN	Outstanding	Outstanding	Outstanding
MMSA or State:			
Minnesota	Outstanding	Outstanding	Outstanding

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, 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 under the Lending, Investment, and Service Tests 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., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area 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 or counties as measured through commuting.

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

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): 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 are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

State of Minnesota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
MN Non-MSA	60	11,672	100.0	7,109	0.0	0.0	0.0	11.0	11.7	10.0	84.0	83.3	84.1	5.0	5.0	6.0	0.0	0.0	0.0		

*Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
MN Non-MSA	60	11,672	100.0	7,109	21.6	13.3	5.8	20.1	21.7	14.2	22.9	15.0	18.8	35.4	50.0	45.0	0.0	0.0	16.1		

*Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2020-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA	20	380	100.0	0.0	0.0	12.9	15.0	82.5	80.0	4.7	5.0	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2020-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA	20	380	100.0	23.8	40.0	17.4	20.0	19.4	25.0	39.5	15.0	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.