



PUBLIC DISCLOSURE

October 20, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Northwestern Bank, National Association
Charter Number 24372

4 North Main Street
Dilworth, MN 56529

Office of the Comptroller of the Currency

222 South 9th Street, Suite 800
Minneapolis, MN 55402

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.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The bank originated a majority of its loans inside its assessment areas (AA).
- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to individuals of different income levels and businesses of different sizes is reasonable.
- The bank received no CRA-related complaints.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

Northwestern Bank, National Association's (Northwestern) LTD ratio averaged 81.64 percent over the 20 quarters since the previous CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 68.96 percent in the first quarter of 2022 and a high of 94.76 percent in the first quarter of 2020. Northwestern ranked second out of four similarly situated institutions. Similarly situated institutions include institutions operating in the bank's AAs with total assets between \$100 million and \$200 million.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 87.50 percent of its total loans by number and 39.84 percent of its loans by dollar volume inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The following table shows Northwestern's lending inside and outside of its AAs.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	13	65.00	7	35.00	20	2,852	62.22	1,732	37.78	4,584
Small Business	37	92.50	3	7.50	40	5,610	32.63	11,584	67.37	17,194
Consumer	20	100.00	0	0.00	20	356	100.00	0	0.00	356
Total	70	87.50	10	12.50	80	8,818	39.84	13,316	60.16	22,134

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Northwestern is a community bank headquartered in Dilworth, Minnesota (MN). Northwestern is wholly owned by Northwestern Bancshares, a one-bank holding company, headquartered in Dilworth, MN. The bank has six locations in northwestern MN and does not operate any deposit-taking ATMs. For this CRA evaluation, the bank's performance was evaluated using two AAs and two rating areas.

Northwestern offers a traditional mix of banking products and services. Northwestern's business strategy is focused on small businesses in MN. Northwestern is also active in the home mortgage market and sells loans on the secondary market. As of December 31, 2024, the bank had \$170 million in total assets and the loan portfolio totaled \$115 million. The loan portfolio by dollar was comprised of 59 percent commercial, 14 percent agricultural loans, 23 percent residential real estate loans, and four percent consumer loans. As of December 31, 2024, tier one capital totaled \$16.8 million, and the leverage ratio was 10.42 percent.

There were no legal, financial, or other factors that impeded Northwestern's ability to meet the credit needs in its AAs during the evaluation period. Northwestern was rated Satisfactory at the prior CRA evaluation, dated October 19, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test covered January 1, 2022, through December 31, 2024. We determined the bank's primary products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period for each AA. For the Fargo MMSA, business and consumer loans were the primary products. For the MN Non-MSA, home mortgage and business loans were the primary products. We selected initial samples of 20 loans for each primary product in each AA. Additional loans were selected as needed to have sufficient data to analyze borrower and geographic distributions within the AAs.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable, are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state and MMSA ratings.

In arriving at overall conclusions, the bank's performance in the Fargo MMSA received more weight than the state of Minnesota since this rating area accounted for a larger portion of the bank's lending and

deposit volumes. Loan originations during the evaluation period totaled \$315 million, with the Fargo MMSA accounting for 66.28 percent of loan volume. Based on the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2024, the bank had \$127 million in deposits in the Fargo MMSA, which represented 91.19 percent of the bank's total deposits.

The MMSA rating and state rating in rating areas with a single AA are based on performance in that AA. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) 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.

Multistate Metropolitan Statistical Area Rating

Fargo, ND-MN MMSA

CRA rating for the Fargo MMSA: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans to individuals of different income levels and businesses of different sizes is reasonable.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Fargo MMSA

The bank operated three locations within the Fargo MMSA during the evaluation period. Locations were in MN, and included the main office in Dilworth, and branches in Moorhead and Ulen. All locations were in middle-income geographies. There were no branch openings or closings in the AA during the evaluation period. The Fargo AA consisted of Clay County in MN and Cass County in North Dakota (ND). This area is known as the Fargo, ND-MN MMSA and referred to within this evaluation as the Fargo MMSA. The AA consisted of 60 CTs, which included five low-income CTs, 12 moderate-income CTs, 28 middle-income CTs, 15 upper-income CTs.

There was significant competition in the Fargo MMSA during the evaluation period. The June 2024 FDIC Deposit Market Share Report indicated there were 33 financial institutions with 96 branches operating in the area. Northwestern ranked 17th with a 0.97 percent deposit market share. The top five institutions were Bell Bank, First International Bank & Trust, Gate City Bank, U.S. Bank National Association, and Wells Fargo Bank, National Association. These five institutions captured 69.33 percent of the deposit market share.

The Fargo MMSA has a diversified economy with the healthcare and education industries being the largest. Based on U.S. Bureau of Labor Statistics data, the unemployment rates as of year-end 2024 for Cass and Clay Counties were 2.4 and 2.1 percent, respectively. County unemployment rates were comparable to the ND and MN state unemployment rates of 2.5 percent and 2.6 percent.

We completed one community contact in conjunction with this examination to gather information about the local economy and banking opportunities. The contact is a leader in the Dilworth city government. The contact stated the local population consists of younger individuals and noted many residents commute to nearby cities of Fargo and Moorhead for work. The contact stated the local economy has a low unemployment rate, a strong agricultural base, a good mix of technology and manufacturing companies, and a strong commercial sector both for online and retail businesses. The contact mentioned local businesses have challenges in finding individuals to fill open job positions. The contact identified credit needs for home mortgage, small business, and farm loans. The contact mentioned that local banks support community organizations and schools.

The following table shows the demographic and economic characteristics of the Fargo MMSA.

Assessment Area - Fargo MMSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	8.33	20.00	46.67	25.00	0.00
Population by Geography	249,843	6.97	18.31	48.69	26.04	0.00
Housing Units by Geography	110,404	8.56	22.70	48.71	20.03	0.00
Owner-Occupied Housing by Geography	56,879	2.17	14.53	55.22	28.08	0.00
Occupied Rental Units by Geography	44,843	14.78	32.00	41.36	11.86	0.00
Vacant Units by Geography	8,682	18.27	28.14	44.08	9.51	0.00
Businesses by Geography	11,434	10.83	24.34	41.65	23.19	0.00
Farms by Geography	620	3.06	10.00	66.61	20.32	0.00
Family Distribution by Income Level	58,291	18.78	18.38	23.45	39.38	0.00
Household Distribution by Income Level	101,722	23.62	15.90	18.89	41.59	0.00
Unemployment rate (%)	3.09	6.11	3.76	3.01	1.84	0.00
Households Below Poverty Level (%)	11.81	33.31	15.22	9.59	5.48	0.00
Median Family Income (22020 - Fargo, ND-MN MSA)		\$90,450		Median Housing Value		\$217,650
Median Family Income (22020 - Fargo, ND-MN MSA) for 2023		\$104,100		Median Gross Rent		\$812
				Families Below Poverty Level		6.25
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Fargo MMSA

The rating for the Fargo MMSA is based on the performance in the Fargo MMSA AA. The bank's business lending performance was weighted more heavily than consumer lending performance when arriving at overall conclusions, given the bank's strategic focus and the dollar volume of the product. Business loans represented 50 percent by dollar and 35 percent by number of total lending in the AA during the evaluation period, whereas consumer loans represented 33 percent by number and 4 percent by dollar.

Refer to Appendix A for additional information on the AA under review.

LENDING TEST

The bank's performance under the Lending Test in the Fargo MMSA is rated satisfactory.

Based on a full-scope review, the bank's performance in the Fargo MMSA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the Fargo MMSA.

Small Loans to Businesses

Refer to Table 9 in the "Fargo MMSA" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of business loans is reasonable. The bank's percentage of business loans in low-income CTs was below both the percentage of businesses and aggregate lending in the low-income CTs. The bank made no loans in low-income CTs. The bank's percentage of business loans in moderate-

income CTs significantly exceeded the percentage of businesses and aggregate lending in moderate-income CTs.

Consumer Loans

Refer to Table 13 in the “MMSA” 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 is reasonable. The bank’s percentage of consumer loans in low-income geographies exceeded the percentage of households in low-income CTs. The bank’s percentage of consumer loans in moderate-income CTs was below the percentage of households in the moderate-income CTs.

Lending Gap Analysis

There were no unexplainable conspicuous gaps in lending to LMI geographies within the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table 10 in the Fargo MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is reasonable. The bank’s percentage of loans to small businesses was below the demographic comparator and aggregate lending performance. We placed more weight on the bank’s performance in comparison to aggregate lending since it was more representative of lending opportunities.

Consumer Loans

Refer to Table 14 in the Fargo MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

Consumer lending reflects excellent distribution among borrowers of different income levels. The bank’s percentage of consumer loans to low and moderate-income (LMI) borrowers significantly exceeded the percentage of LMI households.

Responses to Complaints

Northwestern did not receive any complaints related to performance in meeting the AA’s credit needs.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans to individuals of different income levels and businesses of different sizes is excellent.
- The distribution of loans throughout geographies of different income levels is excellent.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

The bank operated three locations within the MN Non-MSA AA during the evaluation period. Locations included Detroit Lakes, Fergus Falls, and Hendrum. There was one branch opening during the evaluation period, which occurred when the Detroit Lakes location converted from a loan production office to a full-service branch in June 2024. There were no branch closings. The Detroit Lakes and Fergus Falls branches were in moderate-income CTs, and the Hendrum branch was in an underserved, middle-income CT. The MN Non-MSA AA consisted of Becker, Norman, Otter Tail, and Wilkin Counties. The AA consisted of 32 CTs, of which none were low-income, three were moderate-income, 25 were middle-income, and four were upper-income CTs.

Competition in the area was high. The June 2024 FDIC Deposit Market Share Report showed 25 financial institutions with 51 branches operating in the AA. Northwestern ranked 24th with a deposit market share of 0.35 percent. The top five institutions were Bremer Bank, Bell Bank, Midwest Bank, The First National Bank of Henning, and United Community Bank. The top five institutions captured 65.25 percent of the deposit market share.

The local economy is diverse and major industries include agriculture, recreation, and manufacturing. Two larger cities in the AA are Detroit Lakes and Fergus Falls.

We completed one community contact in conjunction with this examination to gather information about the local economy and banking opportunities. The contact is an official for an economic development organization within Becker County. The contact stated the local population is older and aging, being above the state and national averages. The contact said the economy had recovered well post-pandemic and has a low unemployment rate. Economic activity is strong for the size of the population but subject to large seasonal fluctuations. The local economy benefits in summer months when higher earners from the Fargo-Moorhead area spend time at cabins and recreational activities in the area. The contact indicated the local poverty level appears slightly higher than state average and potentially increasing as the population continues to age and less residents obtain higher education. Credit needs identified included home mortgage and small business loans. The contact mentioned that first time homeowners struggle with down payment and credit score requirements. Startups in the area also typically lack the necessary venture capital. The contact stated that banks sufficiently support the local community through volunteer efforts, donations, and community projects.

The following table shows the demographic and economic characteristics of the bank's MN Non-MSA AA.

Assessment Area - MN Non-MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.00	9.38	78.13	12.50	0.00
Population by Geography	108,211	0.00	13.51	74.49	12.00	0.00
Housing Units by Geography	62,700	0.00	12.12	75.90	11.98	0.00
Owner-Occupied Housing by Geography	35,162	0.00	10.57	76.72	12.71	0.00
Occupied Rental Units by Geography	9,043	0.00	24.85	69.87	5.29	0.00
Vacant Units by Geography	18,495	0.00	8.85	77.29	13.86	0.00
Businesses by Geography	4,555	0.00	18.31	70.01	11.68	0.00
Farms by Geography	662	0.00	6.04	84.44	9.52	0.00
Family Distribution by Income Level	29,220	17.52	19.30	23.08	40.11	0.00
Household Distribution by Income Level	44,205	22.43	17.24	18.33	42.00	0.00
Unemployment rate (%)	3.97	0.00	5.62	3.83	2.95	0.00
Households Below Poverty Level (%)	10.17	0.00	17.56	9.54	5.50	0.00
Median Family Income (Non-MSAs - MN)		\$74,737		Median Housing Value		\$187,100
Median Family Income (Non-MSAs - MN) for 2023		\$90,400		Median Gross Rent		\$731
				Families Below Poverty Level		5.72
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Minnesota

The rating for the State of Minnesota is based wholly on the performance of the MN Non-MSA as it is the bank's only AA in the state. Home mortgage and business lending performance received equal weighting when reaching overall conclusions. Business loans represented 52 percent by dollar and 26 percent by number of total lending in the AA during the evaluation period, whereas home mortgage loans represented 39 percent by dollar and 50 percent by number.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the MN Non-MSA AA was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in Minnesota.

Home Mortgage Loans

Refer to Table 7 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 originations and purchases.

The geographic distribution of home mortgage loans is excellent. The bank's percentage of home mortgage loans in moderate-income CTs exceeded the percentage of households and aggregate lending in moderate-income CTs. There were no low-income CTs in the AA.

Small Loans to Businesses

Refer to Table 9 in the state of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of businesses loans is excellent. The bank's percentage of businesses loans in moderate-income CTs significantly exceeded the percentage of businesses and aggregate lending in moderate-income CTs. There were no low-income CTs in the AA.

Lending Gap Analysis

There were no unexplainable conspicuous lending gaps to moderate-income geographies within the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table 10 in the state of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent. The bank's percentage of loans to small businesses exceeded both the percentage of small businesses and the aggregate lending to small businesses in the AA.

Home Mortgage Loans

Refer to Table 8 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 originations.

The distribution of home mortgage loans to individuals of different income levels is excellent. The bank's percentage of home mortgage loans to low-income individuals was below the percentage of low-income households and near aggregate lending to low-income individuals. We placed more weight on the bank's performance in comparison to aggregate lending because it was more reflective of lending opportunities. We also considered poverty levels and housing prices because those factors can reduce the level of qualified borrowers in the low-income category. Within the AA, 5.72 percent of families were in poverty and the median home value as \$187,100. The bank's percentage of home mortgage loans to moderate-income individuals exceeded the percentage of moderate-income households and aggregate lending to moderate-income individuals in the AA.

Responses to Complaints

Northwestern did not receive any complaints related to performance in meeting the AA's credit needs.

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 MSAs and non-MSAs 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:	01/01/2022 – 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, and consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Fargo MMSA	Full-Scope	Clay County, MN and Cass County, ND
Minnesota		
MN Non-MSA	Full-Scope	Becker, Norman, Otter Tail, Wilkin Counties MN

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank	Lending Test Rating
Northwestern Bank, National Association	Satisfactory
MMSA or State:	
Fargo MMSA	Satisfactory
State of Minnesota	Outstanding

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/AA.

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 low- and moderate-income 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 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 state/AA.

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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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 7. 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 8. 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 9. 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 10. 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.
- Table 13. 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 14. 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.

Fargo MMSA

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022 - 2024

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Fargo MMSA	20	3,645	100.00	11,843	10.73	0.00	9.85	25.92	45.00	24.60	44.05	35.00	38.92	19.31	20.00	26.63	0.00	0.00	0.00
Total	20	3,645	100.00	11,843	10.73	0.00	9.85	25.92	45.00	24.60	44.05	35.00	38.92	19.31	20.00	26.63	0.00	0.00	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022 - 2024

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Fargo MMSA	20	3,645	100.00	11,843	79.38	45.00	49.18	9.99	55.00	10.63	0.00
Total	20	3,645	100.00	11,843	79.38	45.00	49.18	9.99	55.00	10.63	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022 - 2024

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
Fargo MMSA	20	312	100.00	7.73	10.00	22.23	10.00	49.11	70.00	20.93	10.00	0.00	0.00
Total	20	312	100.00	7.73	10.00	22.23	10.00	49.11	70.00	20.93	10.00	0.00	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2022 - 2024

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Fargo MMSA	20	312	100.00	23.62	30.00	15.90	55.00	18.89	10.00	41.59	5.00	0.00	0.00
Total	20	312	100.00	23.62	30.00	15.90	55.00	18.89	10.00	41.59	5.00	0.00	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Minnesota

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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	20	3,895	100.00	5,222	0.00	0.00	0.00	10.57	15.00	12.50	76.72	75.00	70.15	12.71	10.00	17.35	0.00	0.00	0.00
Total	20	3,895	100.00	5,222	0.00	0.00	0.00	10.57	15.00	12.50	76.72	75.00	70.15	12.71	10.00	17.35	0.00	0.00	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	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	20	3,895	100.00	5,222	17.52	5.00	8.98	19.30	25.00	19.32	23.08	40.00	20.26	40.11	30.00	36.56	0.00	0.00	14.88
Total	20	3,895	100.00	5,222	17.52	5.00	8.98	19.30	25.00	19.32	23.08	40.00	20.26	40.11	30.00	36.56	0.00	0.00	14.88

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MN Non-MSA	20	2,052	100.00	3,854	0.00	0.00	0.00	18.40	45.00	16.76	69.75	50.00	68.73	11.85	5.00	14.50	0.00	0.00	0.00
Total	20	2,052	100.00	3,854	0.00	0.00	0.00	18.40	45.00	16.76	69.75	50.00	68.73	11.85	5.00	14.50	0.00	0.00	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MN Non-MSA	20	2,052	100.00	3,854	77.85	100.00	57.76	10.27	0.00	11.88	0.00
Total	20	2,052	100.00	3,854	77.85	100.00	57.76	10.27	0.00	11.88	0.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%