



Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

September 2, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Gate City Bank
Charter Number: 700257

500 2nd Avenue North
Fargo, ND 58102

Office of the Comptroller of the Currency
Minneapolis Office
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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 following table indicates the performance level of Gate City Bank (Gate City) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Gate City Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on a combination of the Fargo-Wahpeton ND-MN Combined Statistical Area (CSA), Grand Forks Multistate Metropolitan Statistical Area (MMSA), North Dakota, and Minnesota ratings. Performance in the State of North Dakota is weighted most heavily because it represents the bank's primary area with 42 percent of branch locations, 53 percent of deposit volume as of June 30, 2024, and 40 percent of the home mortgage and small business loan volume by dollar during the evaluation period. Performance in the Fargo-Wahpeton ND-MN CSA receives the next most weight as it represents 38 percent of branch locations, 35 percent of deposit volume as of June 30, 2024, and 40 percent of the home mortgage and small business loan volume by dollar during the evaluation period. Performance in the Grand Forks MMSA receives the next most weight as it represents 7 percent of branch locations, 10 percent of deposit volume as of June 30, 2024, and 10 percent of the home mortgage and small business loan volume by dollar during the evaluation period. Performance in the State of Minnesota receives the least weight as it represents 13 percent of branch locations, 3 percent of deposit volume as of June 30, 2024, and 10 percent of home mortgage and small business loan volume by dollar during the evaluation period.

Performance under the Lending Test is good. Lending activity is excellent, a substantial majority of loans are originated to borrowers located within the bank's assessment areas (AAs), the geographic distribution of loans is excellent, and the borrower distribution of loans is good. Gate City provided an adequate number of community development (CD) loans to address the needs of its AAs.

- The Investment Test rating is based on a combination of the Fargo-Wahpeton ND-MN CSA, Grand Forks MMSA, North Dakota, and Minnesota ratings. Investment Test performance is weighted in the same manner as the Lending Test.

Performance under the Investment Test is good. The volume of CD investment and donation activity appropriately meets the CD needs of Gate City's AAs. Responsiveness to CD needs is good.

- The Service Test rating is based on a combination of the Fargo-Wahpeton ND-MN CSA, Grand Forks MMSA, North Dakota, and Minnesota ratings. Service Test performance is weighted in the same manner as the Lending Test.

Performance under the Service Test is good. Gate City's branch locations are readily accessible to geographies and individuals of different income levels in the bank's AAs. Changes in branch locations has not adversely affected the accessibility of delivery systems. The range of services and business hours does not vary in a way that inconveniences low- and moderate-income (LMI) geographies or individuals. Gate City provides a relatively high level of CD service hours to its AAs.

Innovative or Flexible Lending Products

- Gate City uses flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals. Gate City offers Veteran's Administration, Federal Housing Administration, and first-time homebuyer loans in each of its AAs to facilitate home purchases.
- The bank offers a Better Life Start Loan program designed to address the needs of the unbanked/underbanked segment of its AAs. This unsecured loan product was designed for an individual to establish credit history without the need for a cosigner or requiring a certificate of deposit as collateral. During the evaluation period, Gate City originated 437 Better Life loans, totaling \$787 thousand.
- The bank offers a Better Life Student Loan Program designed to support college graduates pursuing homeownership by reducing student loan payments thus helping individuals qualify for a mortgage. During the evaluation period, the bank provided 219 loans, totaling \$9.6 million.
- The bank offers a Better Life Childcare loan to assist daycare providers with financing to start, maintain, or grow the services they offer. This program offers loans with low-interest rates. The bank has assisted 17 daycare facilities, totaling \$3.9 million.
- The bank offers a Neighborhood Revitalization Initiatives (NRI) which encourages home preservation by providing low-interest rate loans to eligible homeowners for qualified home improvement projects. During the evaluation period, the bank provided 297 NRI loans, totaling \$12.2 million.
- The bank offers alternate delivery systems that are available to all individuals and geographies, including mobile banking and online banking. Gate City also provides remote loan closing options for lending products when available by using DocuSign and remote notary platforms.

Retail Banking Services

- Gate City offers a full line of deposits such as checking accounts, savings account, and certificates of deposit. Retail banking services targeted to LMI individuals, but available to all customers, include free checking account and relationship savings accounts, which have a low minimum amount to open.
- Gate City does not charge automated teller machine (ATM) fees to customers anywhere in the world. Customers can use any ATM worldwide to access funds and Gate City will reimburse any incurred ATM fees. During the evaluation period, management refunded a total of \$6.8 million in ATM fees. To show support for LMI customers, management segmented this data focused on customers with \$2,400 or less of monthly deposit flow in their accounts. For this segment of

customers, Gate City refunded 1.48 million ATM fees totaling \$5.05 million during the evaluation period.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AA). The bank originated and purchased 93 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Table 1: Lending Inside and Outside of the Assessment Area									
	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside	Outside			
#	%	#	%	\$	%	\$	%			
Home Mortgage	9,045	93.0	676	7.0	9,721	1,747,568	91.0	172,901	9.0	1,920,467
Small Business	1,561	92.8	121	7.2	1,682	156,238	92.3	12,951	7.7	169,189
Small Farm	6	100.0	0	0.0	6	802	100.0	0	0.0	802
Total	10,612	93.0	797	7.0	11,409	1,904,608	91.1	185,852	8.9	2,090,458

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

Description of Institution

Gate City is a mutual thrift headquartered in Fargo, North Dakota. Gate City is an interstate bank with 45 branches. Of the total 45 branches, 35 operate in the State of North Dakota and ten branches operate in the State of Minnesota. Gate City operates 56 cash-dispensing ATMs, and none have deposit-taking capabilities.

The bank operates primarily in the larger markets of North Dakota and Minnesota. North Dakota markets primarily include Fargo, Grand Forks, Bismarck, and Minot, but there are also branches throughout rural North Dakota. Minnesota markets primarily include St. Cloud, Alexandria, and Elk River as well as rural areas in West Central Minnesota.

As of December 31, 2024, Gate City's assets totaled \$3.8 billion, loans totaled \$2.9 billion, deposits totaled \$3.3 billion, and tier one capital totaled \$355 million. The loan portfolio, by outstanding dollar volume, is comprised of 62 percent home mortgage loans, 24 percent consumer loans, and 14 percent commercial loans. Gate City's primary focus is on residential mortgage and consumer lending; however, the bank offers a full range of consumer and commercial deposit products and loan types. Gate City also offers agricultural lending with a nominal amount (less than one percent) outstanding as of December 31, 2024.

For purposes of this examination, Gate City operates in eight AAs across four rating areas. Rural areas of North Dakota and Minnesota were combined into one AA for each state. AAs include the Fargo-Wahpeton ND-MN CSA, Grand Forks MMSA, Bismarck MSA, Minot MSA, ND Non-MSA, St. Cloud MSA, Minneapolis MSA, and MN Non-MSA. Rating areas include State of North Dakota, State of Minnesota, Fargo-Wahpeton ND-MN CSA, and Grand Forks MMSA.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. Gate City received a Satisfactory rating in the previous CRA Performance Evaluation dated September 6, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Large Bank Lending, Investment, and Service Tests. The evaluation period was January 1, 2022, to December 31, 2024, except for the Minneapolis MSA and the Minot MSA. The evaluation period for the Minneapolis MSA was June 27, 2023, to December 31, 2024, and the evaluation period for the Minot MSA was January 1, 2024, to December 31, 2024. We reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small business loans reported under CRA during the evaluation period. We did not include small farm loans in our evaluation as the number originated during the evaluation period would not provide for meaningful analysis. We reviewed all CD loans, investments, donations, and services submitted by management as part of our examination. Examiners did not consider consumer loans in this evaluation as management did not request such consideration.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or CSA 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 Rating section 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 CSA, MMSA, and state ratings.

When determining conclusions, we weighted the bank's performance in North Dakota most heavily. The AA represents 42 percent of branch locations, 53 percent of deposit volume as of June 30, 2024, and 40 percent of the home mortgage and small business loan volume by dollar during the evaluation period. Performance in the Fargo-Wahpeton CSA carried the second most weight in overall conclusions, followed by Grand Forks MMSA in third, and lastly Minnesota.

When determining conclusions for the Lending Test, we weighted loan products to reflect Gate City's loan volume by product type during the evaluation period. Home mortgage loans were weighted most heavily in the Lending Test analysis. Home loans represented 92 percent by dollar volume and 85 percent by number of home, business, and farm loan originations during the evaluation period.

The MMSA and CSA ratings in rating areas with a single AA are based on performance in that AA. The state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the "Scope" section under each CSA, MMSA, and State 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 banks 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 assessment area 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 Consumer Financial Protection Bureau, 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.

Combined Statistical Area Rating

Fargo-Wahpeton ND-MN CSA

CRA rating for the Fargo-Wahpeton ND-MN CSA: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs of the AA.
- Gate City exhibits excellent geographic distribution of loans in the AA.
- The institution exhibits a good distribution of loans to borrowers of different income levels and businesses of different sizes.
- Gate City provided a poor level of CD loans to its AA.
- The volume of CD investments is excellent and represents excellent responsiveness to CD needs within the AA.
- Gate City is a leader in providing CD service hours in the AA.
- The institution's service delivery systems are readily accessible to geographies and individuals of different income levels. There are no changes in branch location or accessibility characteristics that would impact individuals or geographic areas from accessing the institution within the AA.

Description of Institution's Operations in Fargo-Wahpeton CSA

The Fargo-Wahpeton CSA represents one rating area and one AA for purposes of this evaluation. This AA consists of Cass and Richland counties in North Dakota and Clay and Wilkin counties in Minnesota. The AA includes the entire counties. This AA includes 44 census tracts (CTs) in Cass County, 16 CTs in Clay County, 6 CTs in Richland County, and 2 CTs in Wilkin County. Gate City operates 17 branches and 24 cash-dispensing ATMs within the AA. The branches are located across Fargo, West Fargo, and Wahpeton in North Dakota and Moorhead in Minnesota. This AA represents 38 percent of branch locations, 35 percent of deposit volume as of June 30, 2024, and 40 percent of loan volume during the evaluation period.

There is a high level of competition for financial services in the Fargo-Wahpeton CSA. As of June 30, 2024, FDIC deposit market share data shows 37 institutions operating 112 offices in the AA. Of those institutions, Gate City ranked third with 7.7 percent market share. The top two institutions accounted for 48 percent of market share. Bell Bank and First International Bank and Trust operate with the highest deposit market share in the AA.

According to Moody's, Education and Health Services represented the largest portion of employment at 19 percent, followed by Government at 13.7 percent, and then Retail Trade and Leisure and Hospitality Services, which are both at 10 percent each.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 2.4 percent, 2.1 percent, 2.9 percent, and 2.5 percent for Cass, Clay, Richland, and Wilkin counties, respectively.

We completed one community contact within the Fargo-Wahpeton CSA. The contact serves as an executive officer of a local nonprofit organization centered around assistance of LMI individuals. The contact stated the economy is relatively stable with a significant demand for affordable housing which is outpacing supply and the primary banking and credit need of the AA. The contact noted steady opportunities for financial institutions to be involved in community development during the evaluation period but noted regulatory headwinds may limit these opportunities in the future.

The following table provides information on the demographic composition of the Fargo-Wahpeton CSA.

Assessment Area - Fargo-Wahpeton CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	68	7.35	17.65	51.47	23.53	0.00
Population by Geography	272,878	6.38	16.76	52.23	24.63	0.00
Housing Units by Geography	121,307	7.79	20.66	52.50	19.05	0.00
Owner-Occupied Housing by Geography	63,887	1.94	12.94	58.88	26.25	0.00
Occupied Rental Units by Geography	47,440	13.97	30.25	44.39	11.39	0.00
Vacant Units by Geography	9,980	15.89	24.48	50.25	9.38	0.00
Businesses by Geography	10,557	8.53	22.24	48.78	20.44	0.00
Farms by Geography	884	1.36	6.56	75.45	16.63	0.00
Family Distribution by Income Level	64,180	18.78	18.16	23.77	39.28	0.00
Household Distribution by Income Level	111,327	23.77	16.04	18.80	41.39	0.00
Unemployment rate (%)	3.11	6.11	3.76	3.09	1.82	0.00
Households Below Poverty Level (%)	11.95	33.31	15.22	10.27	5.47	0.00
Median Family Income (2020 - Fargo, ND-MN MSA)	\$90,450			Median Housing Value	\$211,200	
Median Family Income (Non-MSAs - MN)	\$74,710			Median Gross Rent	\$804	
Median Family Income (Non-MSAs - ND)	\$81,182			Families Below Poverty Level	6.27	
Median Family Income (2020 - Fargo, ND-MN MSA) for 2024	\$105,900					
Median Family Income (Non-MSAs - MN) for 2024	\$90,300					
Median Family Income (Non-MSAs - ND) for 2024	\$98,800					
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 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-Wahpeton CSA

We completed a full scope review of the Fargo-Wahpeton CSA, which is the only AA in the CSA. Refer to Appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FARGO-WAHPETON CSA

LENDING TEST

The bank's performance under the Lending Test in the Fargo-Wahpeton CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Fargo-Wahpeton CSA was good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Table 3: Lending Activity							
Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Fargo-Wahpeton CSA	3,561	592	1	8	4,162	100.0	100.0
Total	3,561	592	1	8	4,162	100.0	100.0
Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Fargo-Wahpeton CSA	696,942	72,954	45	849	770,790	100.00	100.00
Total	696,942	72,954	45	849	770,790	100.00	100.00

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

The tables above include data on all loan originations and purchases in the Fargo-Wahpeton CSA during the evaluation period. Examiners did not analyze farm loans given the low volume of originations. Lending volume in relation to the bank's deposits, competition, and market presence were considered to determine responsiveness to AA credit needs.

Gate City's lending market share in the Fargo-Wahpeton CSA is excellent compared to its deposit share. According to the FDIC Deposit Market Share data as of June 30, 2024, the bank had \$1.1 million in deposits with a deposit market share of 7.7 percent. According to the 2024 peer mortgage data, the bank ranked first out of 201 lenders originating home mortgage loans in the AA. The bank's market share of 16.6 percent is stronger than the bank's deposit market share. According to the 2023 peer small business data, the bank ranked eighth out of 74 lenders originating small business loans in the AA. The bank's market share of 2.8 percent is weaker than the bank's deposit market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in the AA.

Home Mortgage Loans

Refer to Table 7 in the CSA 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 is excellent. The proportion of loans in low-income geographies exceeded the percentage of owner-occupied housing units and was near aggregate lending performance. The proportion of loans in moderate-income geographies was below the percentage of owner-occupied housing units and was near aggregate lending performance.

Small Loans to Businesses

Refer to Table 9 in the CSA 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 small loans to businesses is excellent. The proportion of loans in low-income geographies was near the percentage of businesses and was below aggregate lending performance. The proportion of loans in moderate-income geographies exceeded both the percentage of businesses and aggregate lending performance.

Lending Gap Analysis

Data detailing Gate City's lending activity during the evaluation period for home mortgage loans and small loans to businesses did not reveal any conspicuous gaps in the bank's lending activity. Management made a home mortgage loan or a small business loan in each LMI CT within the CSA during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table 8 in the CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families and near aggregate lending performance. The proportion of loans to moderate-income borrowers was near to the percentage of moderate-income families but was below the aggregate lending.

Small Loans to Businesses

Refer to Table 10 in the CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The borrower distribution of small loan to businesses is good. The proportion of loans was below the percentage of small businesses but exceeded the aggregate lending.

Community Development Lending

The institution made a low level of CD loans. CD lending had a negative impact on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section above for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans, that also qualify as CD loans.

The level of CD lending was poor. The bank made eight CD loans totaling \$849 thousand, which represented 0.7 percent of allocated tier one capital. By dollar volume, 89 percent of the loans were for community services and 11 percent were for affordable housing. CD loan originations exhibit adequate responsiveness to CD needs within the AA.

The following are examples of CD loans the bank originated or purchased in the CSA:

- The bank made a \$224 thousand loan to a recovery center to build out their new leased space. The organization supports 99% LMI individuals.
- The bank made a \$50 thousand loan to assist an organization that completes home repairs for individuals with disability, veterans, and income qualifying individuals.
- The bank made a \$250 thousand loan to an organization centered around offering services to women and children needing shelter, supportive housing, childcare, RN services, etc.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices to serve AA credit needs. Flexible lending programs are described in more detail in the overall CRA rating section.

INVESTMENT TEST

The institution's performance under the Investment Test in Fargo-Wahpeton CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the CSA was excellent.

The institution had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Fargo-Wahpeton CSA	11	1,805	346	15,935	357	100.0	17,740	100.0	-	-
Total	11	1,805	346	15,935	357	100.0	17,740	100.0	-	-

Gate City provided an excellent volume of CD investment and grants to the Fargo-Wahpeton CSA during the evaluation period. Investments and donations totaled \$17.7 million during the evaluation period. This represents 14.4 percent of allocated tier one capital. During the evaluation period, management purchased 15 investments totaling \$14.9 million. Additionally, the bank received credit for 11 previously qualifying investments that are still outstanding. Management provided 331 donations totaling \$1.1 million. The donations support affordable housing and community service organizations.

The following are examples of qualified investments and donations in the CSA:

- A \$1.1 million investment in a Fannie Mae 30-year mortgage-backed security in which all borrowers were low- or moderate-income.
- A \$10 thousand donation to a local non-profit community land trust that works to provide affordable housing.
- A \$100 thousand donation to a local community service group which provides individualized support to low-income individuals with disabilities.

SERVICE TEST

The institution's performance under the Service Test in the Fargo-Wahpeton CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the CSA was excellent.

Retail Banking Services

Assessment Area	Table 5: Distribution of Branch Delivery Systems												
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Branches					Population				
				Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Fargo-Wahpeton CSA	100.0	17	100.0	17.6	35.3	41.2	5.9	0.00	6.4	16.8	52.2	24.6	0.0
Total	100.0	17	100.0	17.6	35.3	41.2	5.9	0.00	6.4	16.8	52.2	24.6	0.0

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

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Fargo-Wahpeton CSA. There are 17 full-service branches in the AA as of December 31, 2024. There are three branches in low-income CTs and six branches in moderate-income CTs. The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank also has six additional branches located in middle- or upper-income CTs that are two miles or less from a low- or moderate-income CT.

Table 6: Distribution of Branch Openings/Closings											
Assessment Area	Branch Openings/Closings										
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)								
			Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp
Fargo-Wahpeton CSA	0	0	-	-	-	-	-	-	-	-	-
Total	0	0	-	-	-	-	-	-	-	-	-

Source: 1/1/2022 - 12/31/2024 Bank Data.

The bank did not open or close branches in this AA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. All branches offer the same products with no variation to the geography income level. Business hours are similar between all branches in the AA.

Community Development Services

The institution is a leader in providing CD services.

The bank provided 67 qualified services totaling 2,000 hours to 23 different organizations during the evaluation period. Strong leadership is evident through board or committee participation in 58 of those activities. Service activities were responsive to CD needs, particularly related to financial education and budgeting assistance.

Multistate Metropolitan Statistical Area Rating

Grand Forks MMSA

CRA rating for the Grand Forks MMSA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA.
- Gate City exhibits excellent geographic distribution of loans in the AA.
- Gate City exhibits good distribution of loans to borrowers of different income levels and businesses of different sizes.
- Gate City provided a good level of CD loans to its AA.
- The volume of CD investments is adequate and represents good responsiveness to CD needs within the AA.
- Gate City provides a relatively high level of CD service hours in its AA.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. There are no changes in branch location of accessibility characteristics that would impact individuals or geographic areas from accessing the institution within the AA.

Description of Institution's Operations in Grand Forks MMSA

The Grand Forks MMSA consists of Grand Forks County in ND and Polk County in MN, in their entirety. This AA includes 22 CTs in Grand Forks County and 10 CTs in Polk County. Gate City operates three branches and three cash dispensing ATMs in the Grand Forks MMSA. All three branches are in Grand Forks.

There is a moderate level of competition for financial services in the Grand Forks MMSA. As of June 30, 2024, FDIC deposit market share data shows 20 institutions operating 38 offices in the AA. Of those institutions, Gate City ranked fourth with 7.8 percent market share. The top two institutions accounted for 37 percent of market share. Alerus Financial and Bremer Bank operate with the highest deposit market share in the Grand Forks MMSA.

According to Moody's, Government represented the largest portion of employment at 24 percent, followed by Education and Health Services at 17 percent, Retail Trade at 12 percent, and Leisure and Hospitality Services at 10 percent.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 2.2 percent and 2.7 percent for Grand Forks and Polk counties, respectively.

We completed one community contacts for the Grand Forks MMSA as part of this evaluation. The contact is a director of a housing agency within the MMSA. The contact stated the economy of Grand Forks is largely dependent on the large university located there. The community has low unemployment rates with a lot of job openings. The contact stated the Grand Forks area is struggling with affordability due to low housing inventory. There is a large demand and credit need for affordable housing, and rental units can be expensive due to high demand. The contact also stated that Gate City Bank is active in the community and known for the quality of their loan products.

The following table provides information on the demographic composition of the Grand Forks MMSA.

Assessment Area - Grand Forks MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	3.13	21.88	53.13	18.75	3.13
Population by Geography	104,362	2.30	18.29	53.14	23.99	2.29
Housing Units by Geography	48,287	1.53	18.96	56.38	20.25	2.87
Owner-Occupied Housing by Geography	23,975	0.03	11.22	58.58	27.78	2.39
Occupied Rental Units by Geography	19,423	2.93	30.11	48.76	14.23	3.96
Vacant Units by Geography	4,889	3.33	12.60	75.88	7.24	0.94
Businesses by Geography	3,682	0.22	21.78	57.41	19.72	0.87
Farms by Geography	497	0.00	3.82	82.70	13.48	0.00
Family Distribution by Income Level	23,352	22.11	15.70	22.88	39.31	0.00
Household Distribution by Income Level	43,398	25.03	15.03	16.91	43.03	0.00
Unemployment rate (%)	3.57	4.60	4.08	4.15	1.33	7.51
Households Below Poverty Level (%)	14.98	60.73	15.99	16.78	7.21	11.85
Median Family Income (24220 - Grand Forks, ND-MN MSA)	\$82,257			Median Housing Value	\$171,700	
Median Family Income (24220 - Grand Forks, ND-MN MSA) for 2024	\$104,300			Median Gross Rent	\$730	
				Families Below Poverty Level	7.46	
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 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 Grand Forks MMSA

We completed a full-scope review of the Grand Forks MMSA, which is the only AA in the MMSA. Refer to Appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GRAND FORKS MMSA

LENDING TEST

The bank's performance under the Lending Test in the Grand Forks MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Grand Forks MMSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							
Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Grand Forks MMSA	970	180	0	10	1,160	100.0	100.0
Total	970	180	0	10	1,160	100.0	100.0
Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Grand Forks MMSA	175,601	15,983	0	2,007	193,591	100.00	100.0
Total	175,601	15,983	0	2,007	193,591	100.00	100.0

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

Lending volume in relation to the bank's deposits, competition, and market presence were considered when determining responsiveness to AA credit needs.

Gate City's lending market share in the Grand Forks MMSA is excellent compared to its deposit market share. According to the FDIC Deposit Market Share data as of June 30, 2024, the bank had \$307 thousand in deposits with a deposit market share of 7.8 percent. According to the 2024 peer mortgage data, the bank ranked first out of 143 lenders originating home mortgage loans in the AA. The bank's market share of 15.8 percent is stronger than the bank's deposit market share. According to the 2023 peer small business data, the bank ranked eighth of 56 lenders originating small business loans in the AA. The bank's market share of 3.5 percent is weaker than the bank's deposit market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the MMSA 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 is excellent. The proportion of loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and aggregate lending performance. There was no lending in the one low-income CT in the AA due to this CT being comprised entirely of a college campus.

Small Loans to Businesses

Refer to Table 9 in the 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 small loans to businesses is excellent. The proportion of loans in moderate-income geographies was near the percentage of businesses and exceeded aggregate lending

performance. There was no lending in the one low-income CT in the AA due to this CT being comprised entirely of a college campus.

Lending Gap Analysis

Data detailing Gate City's lending activity during the evaluation period for home mortgage loans and small loans to businesses did not reveal any conspicuous gaps in the bank's lending activity. During the evaluation period, management did not make loans in two CTs, although we found reasonable explanation of the gap as one CT is comprised entirely of a college campus and the other is comprised mostly of the same campus as well as a small number of twin home and apartment housing mainly utilized by college students.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families and below aggregate lending performance. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near aggregate lending performance.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of small loans to business of different sizes is good. The proportion of loans was well below the percentage of small businesses but exceeded aggregate lending performance.

Community Development Lending

The institution made a relatively high level of CD loans. CD lending had a positive impact on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section above for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans, that also qualify as CD loans.

The level of CD lending was good. The bank made 10 CD loans totaling \$2.01 million, which represented 5.7 percent of allocated capital. By dollar volume, 82 percent were for community services and 18 percent were for affordable housing. CD loans demonstrate good responsiveness to CD needs in the AA.

The following are examples of CD loans the bank originated or purchased in the MMSA:

- The bank made a \$370 thousand loan to purchase a duplex to use for housing for mentally handicapped individuals.
- The bank made a \$114 thousand loan to a business that supports families impacted by domestic violence.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs. Flexible lending programs are described in more detail in the overall CRA rating section.

INVESTMENT TEST

The bank's performance under the Investment Test in the Grand Forks MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Grand Forks MMSA is adequate.

The institution had an adequate level of qualified CD investments and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited good responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Grand Forks MMSA	1	101	92	634	93	100.0	735	100.0	-	-
Total	1	101	92	634	93	100.0	735	100.0	-	-

Gate City provided an adequate volume of CD investments and grants to the Grand Forks MMSA during the evaluation period. CD investments and donations demonstrate good responsiveness to community needs and opportunities in the AA. Investments and donations totaled \$735 thousand during the evaluation period. This represents 2.1 percent of allocated tier one capital.

During the evaluation period, management purchased three investments totaling \$483 thousand. Additionally, the bank received credit for 1 previously qualifying investment that is still outstanding. Management provided 89 donations totaling \$151 thousand. The donations support affordable housing and community service organizations.

The following are examples of qualified investments and donations in the MMSA:

- A \$5 thousand donation to a local organization who provides dental services for low-income individuals.
- A \$4 thousand donation to an organization who provides services for homeless and low-income individuals.

SERVICE TEST

The institution's performance under the Service Test in the Grand Forks MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Grand Forks MMSA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems

Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Grand Forks MMSA	100.0	3	100.0	0.0	66.7	33.3	0.0	0.0	2.3	18.3	53.1	24.0	2.3
Total	100.0	3	100.0	0.0	66.7	33.3	0.0	0.0	2.3	18.3	53.1	24.0	2.3

Source: FFIEC File – 2020, 2024 Census

1/1/2022 - 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.0%.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Grand Forks MMSA. There are 3 full-service branches in the AA as of December 31, 2024. Two of the three branches are located in moderate-income CTs, and the third branch is across the street from a moderate-income CT. The only low-income CT in the AA is comprised entirely of a college campus. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

Table 6: Distribution of Branch Openings/Closings

Assessment Area	Branch Openings/Closings			Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings		Low	Mod	Mid	Upp	NA
Grand Forks MMSA	0	0		-	-	-	-	-
Total	0	0		-	-	-	-	-

Source: 1/1/2022 - 12/31/2024 Bank Data.

The bank did not open or close branches in this AA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. All branches offer the same products with no variation to the geography income level. Business hours are similar between all branches in the AA.

Community Development Services

The institution provided a relatively high level of CD services.

The bank provided 13 qualified services totaling 277 hours to 4 different organizations during the evaluation period. Strong leadership is evident through board or committee participation in all of those activities. Service activities were responsive to CD needs, particularly related to affordable housing and community services to LMI individuals.

State Rating

State of North Dakota

CRA rating for the State of North Dakota: High Satisfactory.

The Lending Test is rated: High Satisfactory.

The Investment Test is rated: Low Satisfactory.

The Service Test is rated: High Satisfactory.

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in Gate City's AAs.
- The bank exhibits good geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank provided an adequate level of CD loans in the state.
- The volume of CD investments is adequate and represents good responsiveness to CD needs within the AA.
- Bank employees provide a relatively high number of CD service hours in the AA.
- Service delivery systems are accessible to geographies and individuals of different income levels. Branch openings had no adverse effect on the accessibility of its delivery systems.

Description of Institution's Operations in North Dakota

Gate City operates three AAs within the State of North Dakota: ND Non-MSA, Bismarck MSA, and Minot MSA (2024 only).

ND Non-MSA

The ND Non-MSA includes the following counties in their entirety: Adams, Barnes, Benson, Bottineau (2022-2023 only), Eddy, Foster, Hettinger, McHenry (2022-2023 only), Mclean, Mountrail, Nelson, Ramsey, Renville (2022-2023 only), Stark, Steele, Stutsman, Traill, Walsh, Ward (2022-2023 only), and Williams. Gate City operates 10 branches and 10 cash-dispensing ATMs in the ND Non-MSA. Branches are in Carrington, Devils Lake, Dickinson, Hettinger Jamestown, Mayville, Park River, Williston, the Cash Wise in Dickinson, and the Cash Wise in Williston. There were also two Minot branches, and the Mohall branch located in the ND Non-MSA but moved into the Minot MSA in 2024. The ND Non-MSA is the largest AA in the state of North Dakota with 46 percent of deposits, 53 percent of branches, and 45 percent of loans.

There is a high level of competition for financial services in the ND Non-MSA. As of June 30, 2024, FDIC deposit market share data shows 34 financial institutions operating 103 offices in the AA. Of those institutions, Gate City ranked second with an 8.1 percent market share. Bravera Bank operates with the highest deposit market share in the ND Non-MSA.

According to Moody's, Government represented the largest portion of employment at 19.1 percent, followed by Education and Health Services at 15.6 percent and Retail Trade at 10.3 percent.

We interviewed one community contact within the AA during the examination and reviewed one community contact completed during the evaluation period. The first contact identified the need for new home construction within Eastern counties of the state, the lack of available contractors, and housing affordability as major concerns within the AA. The contact shared that there is additional need for housing-related financial support but noted that many of the financial institutions across the state have a high level of involvement in CD activities. The second contact identified workforce development, infrastructure (including housing and childcare), and business development as primary needs in the AA. The contact noted that the housing supply is limited in the area and identified financing affordable housing as a CD opportunity in the area.

The following table provides information on the demographic composition of the ND Non-MSA.

Assessment Area – ND Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.00	15.79	61.40	22.81	0.00
Population by Geography	177,997	0.00	11.95	60.56	27.49	0.00
Housing Units by Geography	89,464	0.00	11.58	64.13	24.29	0.00
Owner-Occupied Housing by Geography	46,544	0.00	10.98	62.36	26.66	0.00
Occupied Rental Units by Geography	24,989	0.00	15.41	62.76	21.83	0.00
Vacant Units by Geography	17,931	0.00	7.79	70.65	21.57	0.00
Businesses by Geography	9,141	0.00	10.39	56.13	33.48	0.00
Farms by Geography	1,388	0.00	4.68	74.35	20.97	0.00
Family Distribution by Income Level	42,684	20.44	16.47	21.18	41.92	0.00
Household Distribution by Income Level	71,533	23.99	14.87	18.48	42.67	0.00
Unemployment rate (%)	2.78	0.00	5.67	2.62	1.90	0.00
Households Below Poverty Level (%)	11.16	0.00	15.5	10.7	10.14	0.00
Median Family Income (Non-MSAs - ND)	\$81,182			Median Housing Value	\$158,300	
Median Family Income (Non-MSAs - ND) for 2024	\$98,800			Median Gross Rent	\$706	
				Families Below Poverty Level	6.89	
FFIEC File – 2020 Census						
FFIEC File – 2024 Census						
2024 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						

Bismarck MSA

The Bismarck MSA consists of Burleigh, Morton, and Oliver counties, in their entirety. This AA includes 19 CTs in Burleigh county, 7 CTs in Morton county, and 1 CT in Oliver county. Gate City operates six branches and six cash-dispensing ATMs in the Bismarck MSA. Five branches are in Bismarck, and one is in Mandan. The Bismarck MSA is the second largest AA in the State of North Dakota with 37 percent of deposits, 32 percent of branches, and 50 percent of loans in North Dakota.

There is a moderate level of competition for financial services in the Bismarck MSA. As of June 30, 2024, FDIC deposit market share data shows 18 financial institutions operating 55 offices in the AA. Of

those institutions, Gate City ranked third with a 10.3 percent market share. The top three institutions account for 39 percent of market share. Starion Bank and Dakota Community Bank & Trust operate with the highest deposit market share in the Bismarck MSA.

According to Moody's, Government represented the largest portion of employment at 20.6 percent, followed by Education and Health Services at 19.5 percent and Retail Trade at 11.6 percent.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 2.3 percent, 2.6 percent, and 4.6 percent for Burleigh, Morton, and Oliver counties, respectively.

We completed one new community contact to obtain an understanding of the community development and credit needs of the AA. The contact works for a housing agency in the state of North Dakota. We also reviewed one previously completed contact from 2024. This contact works for a local chamber of commerce. The Bismarck area has a strong labor market with low unemployment. Bismarck has a high number of state government and medical jobs, as well as proximity to the oil fields in western North Dakota, which results in higher average incomes than the rest of the state. Housing prices are high because of high demand and low inventory. There is a large demand for affordable housing, and rental units can be expensive due to high demand. There are credit needs for all loan types. One contact mentioned the need for loans for new construction of both single-family and multifamily properties to improve inventory, while the other added that business and farm loans are also in demand. Both contacts stressed that a bank's involvement in the community is important. Local financial institutions have a high degree of involvement in the community, while large, nationwide banks struggle to make inroads if they are not active in the community.

The following table provides information on the demographic composition of the Bismarck MSA.

Assessment Area – Bismarck MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	27	0.00	11.11	81.48	7.41	0.00		
Population by Geography	133,626	0.00	8.09	81.55	10.36	0.00		
Housing Units by Geography	59,232	0.00	10.02	81.36	8.62	0.00		
Owner-Occupied Housing by Geography	38,041	0.00	7.48	80.49	12.03	0.00		
Occupied Rental Units by Geography	16,009	0.00	14.70	83.11	2.19	0.00		
Vacant Units by Geography	5,182	0.00	14.24	82.34	3.42	0.00		
Businesses by Geography	7,016	0.00	10.80	79.35	9.85	0.00		
Farms by Geography	520	0.00	4.62	84.23	11.15	0.00		
Family Distribution by Income Level	34,592	17.99	18.07	25.41	38.53	0.00		
Household Distribution by Income Level	54,050	22.98	16.23	19.45	41.34	0.00		
Unemployment rate (%)	2.37	0.00	5.58	2.19	0.98	0.00		
Households Below Poverty Level (%)	8.98	0.00	9.27	9.82	1.18	0.00		
Median Family Income (13900 – Bismarck, ND MSA)	\$93,359			Median Housing Value	\$254,500			
Median Family Income (13900 – Bismarck, ND MSA) for 2024	\$108,500			Median Gross Rent	\$871			
				Families Below Poverty Level	4.27			
FFIEC File – 2020 Census								
FFIEC File – 2024 Census								
2024 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								

Minot MSA

The Minot MSA consists of McHenry, Renville, and Ward counties, in their entirety. The evaluation period for the Minot MSA is 2024 only as Minot became an MSA in 2024. Prior to 2024, these three counties were evaluated under the ND Non-MSA. This AA includes 2 CTs in McHenry county, 1 CT in Renville county, and 1 CT in Ward county. Gate City operates three branches and two cash-dispensing ATMs in the AA. Two branches are in Minot and one in Mohall. The Minot MSA is the third largest AA in the state of North Dakota with 17 percent of deposits, 16 percent of branches, and 5 percent of loans.

There is a moderate level of competition for financial services in the Minot MSA. As of June 30, 2024, FDIC deposit market share data shows 14 financial institutions operating 31 offices in the AA. Of those institutions, Gate City ranked fourth with an 8.1 percent market share. The top two institutions account for 49 percent of market share. First Western Bank & Trust and First International Bank & Trust operate with the highest deposit market share in the Minot MSA.

According to Data USA, the major industries in the Minot MSA are Health Care and Social Assistance, Retail Trade, and Educational Services.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 3.8 percent, 1.8 percent, and 2.4 percent for McHenry, Renville, and Ward counties, respectively.

The following table provides information on the demographic composition of the Minot MSA.

Assessment Area – Minot MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.00	5.26	89.47	5.26	0.00
Population by Geography	77,546	0.00	4.03	88.33	7.64	0.00
Housing Units by Geography	37,619	0.00	3.94	88.76	7.29	0.00
Owner-Occupied Housing by Geography	19,755	0.00	3.56	89.45	6.99	0.00
Occupied Rental Units by Geography	12,170	0.00	5.23	87.3	7.47	0.00
Vacant Units by Geography	5,694	0.00	2.51	89.50	7.99	0.00
Businesses by Geography	3,338	0.00	2.61	94.04	3.36	0.00
Farms by Geography	364	0.00	1.10	95.88	3.02	0.00
Family Distribution by Income Level	19,113	15.77	18.74	26.66	38.83	0.00
Household Distribution by Income Level	31,925	21.99	16.64	20.26	41.12	0.00
Unemployment rate (%)	3.56	0.00	1.06	3.92	1.02	0.00
Households Below Poverty Level (%)	10.40	0.00	17.00	10.08	10.53	0.00
Median Family Income (33500 - Minot, ND MSA)	\$85,182		Median Housing Value		\$203,000	
Median Family Income 33500 – Minot, ND MSA) for 2024	\$106,800		Median Gross Rent		\$857	
			Families Below Poverty Level			
FFIEC File – 2020 Census						
FFIEC File – 2024 Census						
2024 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 North Dakota

We completed a full-scope review of the ND Non-MSA and the Bismarck MSA. We completed a limited-scope review of the Minot MSA. Performance in the ND Non-MSA carried the most weight followed by the Bismarck MSA and then the Minot MSA. Refer to Appendix A for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH DAKOTA

LENDING TEST

The bank's performance under the Lending Test in North Dakota is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the ND Non-MSA is excellent, and the Bismarck MSA is adequate.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity*							
Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
ND Non-MSA	1,642	427	3	3	2,075	47.5%	46.0%
Bismarck ND MSA	1,813	225	2	0	2,040	46.7%	36.8%
Minot ND MSA	218	37	0	0	255	5.8%	17.2%
Total	3,673	689	5	3	4,370	100.0%	100.0%
Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
ND Non-MSA	297,158	45,966	687	3,470	347,281	45.4%	46.0%
Bismarck ND MSA	362,397	13,023	70	0	375,490	49.5%	36.8%
Minot ND MSA	36,192	2,639	0	0	38,831	5.1%	17.2%
Total	695,747	61,628	757	3,470	761,602	100.0%	100.0%

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

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The tables above include data on all loan originations and purchases in North Dakota during the evaluation period. Examiners did not analyze farm loans given the low volume of originations. Lending volume in relation to the bank's deposits, competition, and market presence were considered when determining responsiveness to AA credit needs.

ND Non-MSA

Gate City's lending market share in the ND Non-MSA is excellent compared to its deposit share. According to the FDIC Deposit Market Share data as of June 30, 2024, the bank had \$747 million in deposits with a deposit market share of 8.1 percent. According to the 2024 peer mortgage data, the bank ranked first out of 176 lenders originating home mortgage loans in the AA. The bank's market share of 13.6 percent is stronger than the bank's deposit market share. According to the 2023 peer small business data, the bank ranked 11th out of 81 lenders originating small business loans in the AA. The bank's market share of 2.7 percent was weaker than the bank's deposit market share.

Bismarck MSA

Gate City's lending market share in the Bismarck MSA is excellent compared to its deposit share. According to the FDIC Deposit Market Share data as of June 30, 2024, the bank had \$597 million in deposits with a deposit market share of 10.3 percent. According to the 2024 peer mortgage data, the bank ranked first out of 125 lenders originating home mortgage loans in the AA. The bank's market share of 19.3 percent is stronger than the bank's deposit market share. According to the 2023 peer small business data, the bank ranked 10th out of 58 lenders originating small business loans in the AA. The bank's market share of 3 percent was weaker than the bank's deposit market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the State of North Dakota 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.

ND Non-MSA

The geographic distribution of home mortgage loans is excellent. The proportion of loans in moderate-income geographies during 2022-2023 was near to the percentage of owner-occupied housing units and exceeded aggregate lending performance. The proportion of loans in moderate-income geographies during 2024 was near the percentage of owner-occupied housing units and exceeded aggregate lending performance. There were no low-income geographies in the AA.

Bismarck MSA

The geographic distribution of home mortgage loans is adequate. The proportion of loans to moderate-income geographies was below both the percentage of owner-occupied housing units and aggregate lending performance. There were no low-income geographies in the AA.

Small Loans to Businesses

Refer to Table 9 in the State of North Dakota 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.

ND Non-MSA

The geographic distribution of small loans to businesses is adequate. The proportion of loans in moderate-income geographies during 2022-2023 was below both the percentage of businesses and aggregate lending performance. The proportion of loans in moderate-income geographies during 2024 was below the percentage of businesses. Aggregate lending performance data was not available for 2024. There were no low-income geographies in the AA.

Bismarck MSA

The geographic distribution of small loans to businesses is excellent. The proportion of loans in moderate-income geographies exceeded the percentage of businesses and was near aggregate lending performance. There were no low-income geographies in the AA.

Lending Gap Analysis

Data detailing Gate City's lending activity during the evaluation period for home mortgage loans and small loans to businesses did not reveal any conspicuous gaps in the bank's lending activity. During the evaluation period, management did not make loans in two CTs in the ND Non-MSA, although we found reasonable explanation for both. Management made a home mortgage or small business loan in each LMI CT within the Bismarck MSA during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table 8 in the State of North Dakota 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.

ND Non-MSA

The borrower distribution of home mortgage loans is excellent. The proportion of loans to low-income borrowers in 2022-2023 and 2024 was well below the percentage of low-income families but exceeded aggregate lending performance. The proportion of loans to moderate-income borrowers during the same period exceeded the percentage of moderate-income families and was near to aggregate lending performance.

Bismarck MSA

The borrower distribution of home mortgage loans is adequate. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families and below aggregate lending performance. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to aggregate lending performance.

Small Loans to Businesses

Refer to Table 10 in the State of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

ND Non-MSA

The borrower distribution of small loans to businesses is excellent. The proportion of loans in 2022-2023 was near to the percentage of small businesses and exceeded aggregate lending performance. The

proportion of loans in 2024 was near to the percentage of small businesses. The aggregate lending data for 2024 is not yet available.

Bismarck MSA

The borrower distribution of small loans to businesses is excellent. The proportion of loans was near to the percentage of small businesses and exceeded aggregate lending performance.

Community Development Lending

The institution made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section above for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

ND Non-MSA

The level of CD lending was adequate. The bank made three CD loans totaling \$3.5 million, which represented four percent of allocated tier one capital. All three loans were for community services. CD loan originations exhibit adequate responsiveness to CD needs within the AA.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank made a \$1.6 million line of credit for the construction of a new care facility for individuals with disabilities, and
- The bank made a \$180 thousand loan for the purchase of an office building for an association that provides assistance to homeless individuals.

Bismarck MSA

Management did not originate or purchase any CD loans in the Bismarck MSA during the evaluation period.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs. Flexible lending programs are described in more detail in the overall CRA rating section.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 14 in the State of North Dakota section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Minot MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The institution's performance under the Investment Test in North Dakota is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the ND Non-MSA is adequate, and the Bismarck MSA Needs Improvement.

The institution had an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited adequate responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
ND Non-MSA	3	1,330	68	565	71	36.2	1,895	38.8	-	-
Bismarck MSA	4	718	95	348	99	50.5	1,066	21.8	-	-
Minot MSA	5	1,057	20	676	25	12.8	1,733	35.5	-	-
Broader Statewide or Regional Area	-	-	1	191	1	0.5	191	3.9	-	-
Total	12	3,105	184	1,780	196	100.0	4,885	100.0	-	-

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

ND Non-MSA

Gate City provided an adequate volume of CD investments and donations to the ND Non-MSA during the evaluation period. CD investments and donations demonstrate adequate responsiveness to community needs and opportunities in the AA. Donations and investments totaled \$1.9 million during the evaluation period. This represents 2.2 percent of allocated tier one capital.

During the evaluation period, management purchased two investments totaling \$520 thousand. Additionally, the bank received credit for three previously qualifying investments that are still outstanding. Management provided 66 donations, totaling \$45 thousand. The donations support affordable housing and community service organizations.

The following are examples of qualified investments and donations in the AA:

- A security with book value of \$1.1 million for a multifamily apartment building with a high percentage of low- and very low-income units,
- 12 donations totaling four thousand to a mentoring organization that serves low- to moderate-income and high-risk children, and
- Three donations totaling one thousand to an organization that provides services to victims of domestic violence.

Bismarck MSA

Gate City provided a poor volume of CD investments and donations to the Bismarck MSA during the evaluation period. CD investments and donations totaled \$1.1 million during the evaluation period. This represents 1.6 percent of allocated tier one capital.

During the evaluation period, management purchased two investments totaling \$293 thousand. Additionally, the bank received credit for four previously qualifying investments that are still outstanding. Management provided 93 donations, totaling \$55 thousand. The donations support affordable housing and community service organizations.

The following are examples of qualified investments and donations in the AA:

- Mortgage-backed securities whose underlying loans were to LMI borrowers.
- 14 donations totaling six thousand to a homeless shelter and soup kitchen.
- Six donations totaling six thousand to a nonprofit that helps low-income homeowners.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Minot MSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in North Dakota is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the ND Non-MSA is good and in the Bismarck MSA is excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems*

Assessment Area	Deposits		Branches						Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
ND Non-MSA	46.0	10	52.6	0.0	10.0	70.0	20.0	0.0	0.0	11.9	60.6	27.5	0.0	
Bismarck MSA	36.8	6	31.6	0.0	16.7	66.6	16.7	0.0	0.0	8.1	81.5	10.4	0.0	
Minot MSA	17.2	3	15.8	0.0	0.0	100.0	0.0	0.0	0.0	4.0	88.3	7.7	0.0	

Source: FFIEC File – 2020, 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%*

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

ND Non-MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the ND Non-MSA. There were 10 full-service branches in the AA. There is one branch located in a moderate-income CT. The bank's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies.

Bismarck MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Bismarck MSA. There were six full-service branches in the AA. There is one branch located in a moderate-income CT. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank also has two additional branches located in middle- or upper-income CTs that are within a mile of a moderate-income CT.

Table 6: Distribution of Branch Openings/Closings*

Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings				
			Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
ND Non-MSA	1	0	-	-	-	1	-
Bismarck MSA	0	0	-	-	-	-	-
Minot MSA	0	0	-	-	-	-	-
Total	1	0	-	-	-	1	-

Source: 1/1/2022 - 12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

ND Non-MSA

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Management opened one branch location in Williston during the evaluation period. This branch is located in an upper-income CT.

Bismarck MSA

The bank did not open or close any branches in the Bismarck MSA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. All branches offer the same products with no variation to the geography income level. Business hours are similar between all branches in the AA.

Community Development Services

The institution provided a relatively high number of CD services.

ND Non-MSA

Gate City provided a relatively high level of CD services in the ND Non-MSA. The bank provided 12 qualified services totaling 371 hours to 7 different organizations during the evaluation period. Strong leadership is evident through board or committee participation in all of those activities. Service activities were responsive to CD needs, particularly to community services to LMI individuals.

Bismarck MSA

Gate City provided a relatively high level of CD services in the Bismarck MSA. The bank provided 13 qualified services totaling 170 hours to 6 different organizations during the evaluation period. Strong leadership is evident through board or committee participation in six of those activities. Service activities were responsive to CD needs, particularly to affordable housing and community services to LMI individuals.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Minot MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: High Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs of the AA.
- Gate City exhibited an excellent geographic distribution of loans in the AA.
- The institution exhibits an adequate distribution of loans to borrowers of different income levels and businesses of different sizes.
- Gate City did not originate any CD loans in the State of Minnesota during the evaluation period.
- The volume of CD investments is excellent and represents good responsiveness to CD needs within the AA.
- Gate City provided an adequate level of CD service hours in the AAs.
- The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. There was one branch opened during the evaluation period, but there is no adverse effect on the accessibility of branch delivery systems.

Description of Institution's Operations in Minnesota

Gate City operates three AAs within the State of Minnesota: MN Non-MSA, St. Cloud MSA, and Minneapolis MSA (branch opened in 2023).

MN Non-MSA

The MN Non-MSA consists of Becker, Douglas, Norman, and Otter Tail counties in their entirety. This AA includes 10 CTs in Becker County, 11 CTs in Douglas County, 3 CTs in Norman County, and 17 CTs in Otter Tail county. Gate City operates two branches and two cash-dispensing ATMs in the MN Non-MSA. The branches are in Alexandria and Fergus Falls. The MN Non-MSA is the largest AA in the state of Minnesota with 76 percent of deposits, 33 percent of branches, and 87 percent of loans in Minnesota.

There is a high level of competition for financial services in the MN Non-MSA. As of June 30, 2024, FDIC deposit market share data shows 32 institutions operating 66 offices in the AA. Of those institutions, Gate City ranked 19th with 1.2 percent market share. The top two institutions accounted for

36 percent of market share. Bremer Bank and Bell Bank operate with the highest deposit market share in the MN Non-MSA.

According to Data USA, the largest industries in this AA are Health Care and Social Assistance, Manufacturing, and Retail Trade.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 3.8 percent, 2.7 percent, 3.5 percent, and 3.7 percent for Becker, Douglas, Norman, and Otter Tail counties, respectively.

The following table provides information on the demographic composition of the MN Non-MSA.

Assessment Area - MN Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	0.00	7.32	75.61	17.07	0.00
Population by Geography	140,711	0.00	10.39	71.09	18.52	0.00
Housing Units by Geography	80,898	0.00	9.39	72.50	18.11	0.00
Owner-Occupied Housing by Geography	45,333	0.00	8.20	71.72	20.08	0.00
Occupied Rental Units by Geography	12,883	0.00	17.44	76.19	6.36	0.00
Vacant Units by Geography	22,682	0.00	7.22	71.96	20.82	0.00
Businesses by Geography	6,487	0.00	13.66	68.17	18.17	0.00
Farms by Geography	748	0.00	5.88	76.87	17.25	0.00
Family Distribution by Income Level	38,204	16.63	18.82	23.05	41.50	0.00
Household Distribution by Income Level	58,216	21.88	16.35	18.54	43.22	0.00
Unemployment rate (%)	3.49	0.00	5.62	3.49	2.29	0.00
Households Below Poverty Level (%)	9.88	0.00	17.56	9.94	5.01	0.00
Median Family Income (Non-MSAs - MN)	\$74,710		Median Housing Value		\$203,200	
Median Family Income (Non-MSAs - MN) for 2024	\$90,300		Median Gross Rent		\$733	
			Families Below Poverty Level		5.27	
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 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						

St Cloud MSA

The St Cloud MSA consists of Benton and Stearns counties in their entirety. This AA includes 10 CTs in Benton County and 37 CTs in Stearns County. Gate City operates three branches and seven cash-dispensing ATMs in the St. Cloud MSA. The branches are located inside grocery store locations in Sauk Rapids, St. Cloud, and Waite Park. The St Cloud MSA is the second largest AA in the state of Minnesota with 14 percent of deposits, 50 percent of branches, and 12 percent of loans in Minnesota.

There is a high level of competition for financial services in the St Cloud MSA. As of June 30, 2024, FDIC deposit market share data shows 33 financial institutions operating 59 offices in the AA. Of those institutions, Gate City ranked 33rd with under one percent market share. The top two institutions accounted for 36 percent of market share. Stearns Bank and Bremer Bank operate with the highest deposit market share in the St. Cloud MSA.

According to Moody's, Education and Health Services represented the largest portion of employment at 20 percent, followed by Manufacturing at 13.9 percent and Government at 13.8 percent.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 3.6 percent and 2.8 percent for Benton and Stearns Counties, respectively.

The following table provides information on the demographic composition of the St. Cloud MSA.

Assessment Area - St. Cloud MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	2.13	17.02	63.83	14.89	2.13
Population by Geography	199,671	1.20	16.55	64.26	16.98	1.01
Housing Units by Geography	82,381	1.09	18.07	65.31	14.91	0.62
Owner-Occupied Housing by Geography	52,003	0.05	11.96	68.55	19.35	0.09
Occupied Rental Units by Geography	24,055	2.85	32.83	56.20	6.51	1.60
Vacant Units by Geography	6,323	2.99	12.11	73.41	10.34	1.14
Businesses by Geography	7,221	0.17	12.23	66.39	17.44	3.78
Farms by Geography	653	0.00	4.75	79.02	16.23	0.00
Family Distribution by Income Level	48,126	18.55	18.57	24.11	38.77	0.00
Household Distribution by Income Level	76,058	22.92	16.96	18.63	41.49	0.00
Unemployment rate (%)	4.59	4.19	8.53	3.39	4.19	17.49
Households Below Poverty Level (%)	10.68	54.29	20.15	8.98	2.59	40.92
Median Family Income (41060 - St. Cloud, MN MSA)	\$80,403		Median Housing Value		\$192,400	
Median Family Income (41060 - St. Cloud, MN MSA) for 2024	\$97,800		Median Gross Rent		\$785	
			Families Below Poverty Level		6.22	
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 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						

Minneapolis MSA

The Minneapolis MSA consists of Sherburne County in its entirety. This AA includes 19 CTs in Sherburne County. Gate City operates one branch and two cash-dispensing ATMs in the AA. This branch was opened in June 2023. The branch is in Elk River. The Minneapolis MSA is the third largest AA in the state of Minnesota with 11 percent of deposits, 17 percent of branches, and one percent of loans in Minnesota.

There is a moderate level of competition for financial services in the Minneapolis MSA. As of June 30, 2024, FDIC deposit market share data shows 13 financial institutions operating 17 offices in the AA. Of those institutions, Gate City ranked 12th with under one percent market share. The top three institutions account for 61 percent of market share. The Bank of Elk River, Wells Fargo, and First Bank Elk River operate with the highest deposit market share in the Minneapolis MSA.

According to the Sherburne County website, the major industries include utilities, manufacturing, health care, and retail.

According to the Bureau of Labor Statistics, the non-seasonally adjusted December 2024 unemployment rate was 2.9 percent for Sherburne County.

The following table provides information on the demographic composition of the Minneapolis MSA.

Assessment Area - Minneapolis MSA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	19	0.00	10.53	84.21	5.26	0.00	
Population by Geography	97,183	0.00	13.07	81.27	5.67	0.00	
Housing Units by Geography	34,356	0.00	14.52	80.70	4.78	0.00	
Owner-Occupied Housing by Geography	27,181	0.00	9.50	85.38	5.11	0.00	
Occupied Rental Units by Geography	5,610	0.00	39.95	56.13	3.92	0.00	
Vacant Units by Geography	1,565	0.00	10.54	87.35	2.11	0.00	
Businesses by Geography	2,253	0.00	13.05	77.76	9.19	0.00	
Farms by Geography	110	0.00	13.64	80.00	6.36	0.00	
Family Distribution by Income Level	24,373	18.54	20.74	27.28	33.44	0.00	
Household Distribution by Income Level	32,791	19.08	16.69	21.54	42.69	0.00	
Unemployment rate (%)	2.37	0.00	3.21	2.29	1.74	0.00	
Households Below Poverty Level (%)	5.93	0.00	17.41	4.03	2.67	0.00	
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)	\$103,977			Median Housing Value	\$251,700		
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2024	\$123,700			Median Gross Rent	\$1,075		
				Families Below Poverty Level	3.21		
FFIEC File - 2020 Census							
FFIEC File - 2024 Census							
2024 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

We completed a full-scope review of the MN Non-MSA. We completed a limited-scope review of the St. Cloud MSA and the Minneapolis MSA. Performance in the MN Non-MSA carried the most weight followed by the St Cloud MSA and then the Minneapolis MSA. Refer to Appendix A for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Table 3: Lending Activity*

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
MN Non-MSA	709	89	0	0	798	84.8	75.6
St. Cloud MSA	119	9	0	0	128	13.6	13.5
Minneapolis MSA	13	2	0	0	15	1.6	10.9
Total	841	100	0	0	941	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
MN Non-MSA	155,254	5,086	0	0	160,340	86.7	75.6
S. Cloud MSA	21,483	535	0	0	22,018	11.9	13.5
Minneapolis MSA	2,540	52	0	0	2,592	1.4	10.9
Total	179,277	5,673	0	0	184,950	100.0	100.0

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%.

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

MN Non-MSA

Gate City's lending market share in the MN Non-MSA is excellent compared to its deposit market share. According to the FDIC Deposit Market Share data as of June 30, 2024, the bank had \$62 million in deposits with a deposit market share of 1.2 percent. According to the 2024 peer mortgage data, the bank ranked third out of 232 lenders originating home mortgage loans in the AA. The bank's market share of 7 percent is stronger than the bank's deposit market share. According to the 2023 peer small business data, the bank ranked 11th out of 61 lenders originating small business loans in the AA. The bank's market share of 1.4 percent was comparable to the bank's deposit market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

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 loan originations and purchases.

MN Non-MSA

The geographic distribution of home mortgage loans is excellent. The proportion of loans in moderate-income geographies exceeded the percentage of owner-occupied housing units and was near to aggregate lending performance. There were no low-income geographies 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.

MN Non-MSA

The geographic distribution of small loans to businesses is excellent. The proportion of loans in moderate-income geographies was near the percentage of businesses and exceeded aggregate lending performance. There were no low-income geographies in the AA.

Lending Gap Analysis

Data detailing Gate City's lending activity during the evaluation period for home mortgage loans and small loans to businesses did not reveal any conspicuous gaps in the bank's lending activity. Management made a home mortgage loan or small business loan in each LMI CT within the MN Non-MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

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 loan originations and purchases.

MN Non-MSA

The borrower distribution of home mortgage loans is adequate. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families and below aggregate lending performance. The proportion of loans to moderate-income borrowers was below both the percentage of moderate-income families and aggregate lending performance.

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 origination and purchase of small loans to businesses.

MN Non-MSA

The borrower distribution of small loans to businesses is excellent. The proportion of loans exceeded both the percentage of small businesses and aggregate lending performance.

Community Development Lending

The institution made few, if any, CD loans. CD lending had a negative impact on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section above for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

MN Non-MSA

Management did not originate any CD loans in the MN Non-MSA during the evaluation period.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices to serve AA credit needs. Flexible lending programs are described in more detail in the overall CRA rating section.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Minnesota section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the St. Cloud MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the Minneapolis MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area.

INVESTMENT TEST

The bank's performance under the Investment Test in Minnesota is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

The institution had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited good responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Table 4: 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	1	88	14	2,252	15	26.3	2,340	36.8	-	-
St Cloud MSA	-	-	36	2,935	36	63.2	2,935	46.2	-	-
Minneapolis MSA	1	279	4	794	5	8.8	1,073	16.9	-	-
Broader Statewide or Regional Area	-	-	1	5	1	1.7	5	0.1	-	-
Total	2	367	55	5,986	57	100.0	6,353	100.0	-	-

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

MN Non-MSA

Gate City provided an excellent volume of CD investments and grants to the MN Non-MSA during the evaluation period. CD investments and donations demonstrate good responsiveness to community needs

and opportunities in the AA. Investments and donations total \$2.3 million during the evaluation period. This represents 32.8 percent of allocated tier one capital.

During the evaluation period, management purchased two investments totaling \$2.2 million. Additionally, the bank received credit for 1 previously qualifying investment that is still outstanding. Management provided 12 donations totaling \$67 thousand. The donations support affordable housing and community service organizations.

The following are examples of qualified investments and donations in the AA:

- A \$21 thousand donation to an organization who provides community services for LMI seniors residing in senior living facilities.
- A \$1,500 donation to provide school supplies to low-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the St. Cloud MSA and the Minneapolis MSA was consistent with the bank's overall performance under the Investment Test in the MN Non-MSA.

SERVICE TEST

The bank's performance under the Service Test in Minnesota is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems*

Assessment Area	Deposits		Branches					Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
MN Non-MSA	75.6	2	33.3	0.0	50.0	50.0	0.0	0.0	0.0	10.4	71.1	18.5	0.0
St. Cloud MSA	13.5	3	50.0	0.0	66.7	33.3	0.0	0.0	1.2	16.6	64.3	16.9	1.0
Minneapolis MSA	10.9	1	16.7	0.0	0.0	100.0	0.0	0.0	0.0	13.1	81.3	5.6	0.0

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

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

MN Non-MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Minnesota Non-MSA. There are two full-service branches in the AA. There was one branch in a moderate-income CT. There were no low-income geographies in the AA. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

Table 6: Distribution of Branch Openings/Closings*

Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings				
			Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
MN Non-MSA	0	0	-	-	-	-	-
St Cloud MSA	0	0	-	-	-	-	-
Minneapolis MSA	1	0	-	-	1	-	-
Total	1	0	-	-	1	-	-

Source: 1/1/2022 - 12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Management opened one branch location in Elk River during the evaluation period. This branch is located in a middle-income CT.

Services and business hours do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. All branches offer the same products with no variation to the geography income level. Business hours are similar between all branches in the AA.

Community Development Services

The institution provided an adequate level of CD services.

MN Non-MSA

The bank provided 4 qualified services totaling 34 hours to 3 different organizations during the evaluation period. Strong leadership is evident through board or committee participation in all of those activities. Service activities were responsive to CD needs, particularly related to affordable housing and community services to LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the St. Cloud MSA is consistent with the bank's overall performance under the Service Test in the MN Non-MSA. The bank's performance under the Service Test in the Minneapolis MSA is weaker than the bank's overall performance in the MN Non-MSA.

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 to 12/31/2024	
Bank Products Reviewed:	Home mortgage and small business loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of AAs and Type of Examination		
Rating and AAs	Type of Exam	Other Information
MMSA(s)		
Fargo-Wahpeton ND-MN CSA	Full-scope	Cass and Richland counties in North Dakota Clay and Wilken counties in Minnesota
Grand Forks ND-MN MMSA	Full-scope	Grand Forks county in North Dakota Polk county in Minnesota
North Dakota		
Bismarck ND MSA	Full-scope	Burleigh, Morton, and Oliver counties
Minot ND MSA	Limited-scope	McHenry, Renville, and Ward counties
North Dakota Non-MSA	Full-scope	Adams, Barnes, Benson, Bottineau (2022-2023 only), Eddy, Foster, Hettinger, McHenry (2022-2023 only), Mclean, Mountrail, Nelson, Ramsey, Renville (2022-2023 only), Stark, Steele, Stutsman, Traill, Walsh, Ward (2022-2023 only), and Williams counties
Minnesota		
St. Cloud MN MSA	Limited-scope	Benton and Stearns counties
Minneapolis MN MSA	Limited-scope	Sherburne county
Minnesota Non-MSA	Full-scope	Becker, Douglas, Norman, and Otter Tail counties

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Gate City Bank	High Satisfactory	High Satisfactory	High Satisfactory	High Satisfactory
MMSA or State:				
Fargo-Wahpeton ND-MN CSA	Outstanding	Outstanding	Outstanding	High Satisfactory
Grand Forks ND-MN MMSA	Outstanding	Low Satisfactory	Outstanding	Outstanding
State of North Dakota	High Satisfactory	Low Satisfactory	High Satisfactory	High Satisfactory
State of Minnesota	High Satisfactory	High Satisfactory	High Satisfactory	High Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests 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 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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/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 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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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 loans are treated the same 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/AA. 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/AA. 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 AA.

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.

Fargo-Wahpeton ND-MN CSA

Assessment Area:	Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography															2022 - 2024			
	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
Fargo-Wahpeton CSA	3,561	696,942	100.00	20,489	1.94	2.78	3.15	12.94	10.05	11.05	58.88	47.63	49.42	26.25	39.54	36.38	--	0.0	--
Total	3,561	696,942	100.00	20,489	1.94	2.78	3.15	12.94	10.05	11.05	58.88	47.63	49.42	26.25	39.54	36.38	--	0.0	--

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

Assessment Area:	Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower															2022 - 2024			
	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
Fargo-Wahpeton CSA	3,561	696,942	100.00	20,489	18.78	6.09	8.01	18.16	18.11	21.63	23.77	25.11	22.98	39.28	40.58	29.16	--	10.11	18.22
Total	3,561	696,942	100.00	20,489	18.78	6.09	8.01	18.16	18.11	21.63	23.77	25.11	22.98	39.28	40.58	29.16	--	10.11	18.22

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

Assessment Area:	Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography															2022 - 2024			
	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-Wahpeton CSA	592	72,954	100.00	12,822	8.53	7.43	9.10	22.24	36.49	22.72	48.78	31.76	42.61	20.44	24.32	25.57	--	0.0	--
Total	592	72,954	100.00	12,822	8.53	7.43	9.10	22.24	36.49	22.72	48.78	31.76	42.61	20.44	24.32	25.57	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 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-Wahpeton CSA	592	72,954	100.00	12,822	80.16	60.30	49.99	8.57	38.18	11.26	1.52		
Total	592	72,954	100.00	12,822	80.16	60.30	49.99	8.57	38.18	11.26	1.52		

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

Grand Forks MMSA

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
Grand Forks MMSA	970	175,601	100.00	5,908	0.03	0.0	--	11.22	14.33	12.69	58.58	39.28	51.73	27.78	45.26	33.82	2.39	1.13	1.76
Total	970	175,601	100.00	5,908	0.03	0.0	--	11.22	14.33	12.69	58.58	39.28	51.73	27.78	45.26	33.82	2.39	1.13	1.76

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 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
Grand Forks MMSA	970	175,601	100.00	5,908	22.11	5.46	8.51	15.70	19.38	21.87	22.88	25.15	21.99	39.31	44.33	30.30	--	5.67	17.33
Total	970	175,601	100.00	5,908	22.11	5.46	8.51	15.70	19.38	21.87	22.88	25.15	21.99	39.31	44.33	30.30	--	5.67	17.33

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

Assessment Area:	Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography															2022 - 2024			
	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
Grand Forks MMSA	180	15,983	100.00	4,004	0.22	0.0	0.07	21.78	20.00	17.18	57.41	35.56	50.10	19.72	43.89	30.39	0.87	0.56	2.25
Total	180	15,983	100.00	4,004	0.22	0.0	0.07	21.78	20.00	17.18	57.41	35.56	50.10	19.72	43.89	30.39	0.87	0.56	2.25

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues															2022 - 2024			
	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	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Grand Forks MMSA	180	15,983	100.00	4,004	76.13	52.78	48.93	9.59	44.44	14.29	2.78								
Total	180	15,983	100.00	4,004	76.13	52.78	48.93	9.59	44.44	14.29	2.78								

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

State of North Dakota

Assessment Area:	Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography															2022 - 2024			
	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
Bismarck MSA	1,813	362,397	100.00	9,514	--	0.0	--	7.48	5.30	6.60	80.49	75.73	79.03	12.03	18.97	14.36	--	0.0	--
Total	1,813	362,397	100.00	9,514	--	0.0	--	7.48	5.30	6.60	80.49	75.73	79.03	12.03	18.97	14.36	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

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
ND Non-MSA	1,239	224,867	100.00	9,449	--	0.0	--	8.63	8.56	7.69	72.42	64.89	69.22	18.95	26.55	23.03	--	0.0	--
Total	1,239	224,867	100.00	9,449	--	0.0	--	8.63	8.56	7.69	72.42	64.89	69.22	18.95	26.55	23.03	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

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
Minot MSA	218	36,192	35.10	1,599	--	0.0	--	3.56	1.83	2.50	89.45	93.12	91.06	6.99	5.05	5.94	--	0.0	--
ND Non-MSA	403	72,291	64.90	2,975	--	0.0	--	10.98	9.68	8.64	62.36	51.86	56.87	26.66	38.46	34.32	--	0.0	--
Total	621	108,483	100.00	4,574	--	0.0	--	8.77	6.92	6.49	70.43	66.34	68.82	20.80	26.73	24.40	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 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

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
Bismarck MSA	1,813	362,397	100.00	9,514	17.99	5.96	9.33	18.07	18.20	21.00	25.41	26.25	24.10	38.53	44.24	30.74	--	5.35	14.82
Total	1,813	362,397	100.00	9,514	17.99	5.96	9.33	18.07	18.20	21.00	25.41	26.25	24.10	38.53	44.24	30.74	--	5.35	14.82

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 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 - 2023		
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		
ND Non-MSA	1,239	224,867	100.00	9,449	18.91	9.44	7.87	17.08	21.31	21.56	22.95	25.91	23.56	41.05	37.53	28.62	--	5.81	18.39		
Total	1,239	224,867	100.00	9,449	18.91	9.44	7.87	17.08	21.31	21.56	22.95	25.91	23.56	41.05	37.53	28.62	--	5.81	18.39		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2023 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																			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		
Minot MSA	218	36,192	35.10	1,599	15.77	7.34	8.63	18.74	25.23	23.89	26.66	26.15	22.39	38.83	38.53	23.70	--	2.75	21.39		
ND Non-MSA	403	72,291	64.90	2,975	20.44	7.20	6.62	16.47	17.87	18.45	21.18	22.08	23.16	41.92	46.90	33.48	--	5.96	18.29		
Total	621	108,483	100.00	4,574	18.99	7.25	7.32	17.17	20.45	20.35	22.87	23.51	22.89	40.96	43.96	30.06	--	4.83	19.37		

Source: FFIEC File - 2020, 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 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		
Bismarck MSA	225	13,023	100.00	5,547	--	0.0	--	10.80	12.00	13.09	79.35	77.33	75.99	9.85	10.67	10.92	--	0.0	--		
Total	225	13,023	100.00	5,547	--	0.0	--	10.80	12.00	13.09	79.35	77.33	75.99	9.85	10.67	10.92	--	0.0	--		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA 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 - 2023		
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		

	#	\$	% 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
ND Non-MSA	340	35,987	100.00	11,308	--	0.0	--	8.71	6.47	7.98	68.33	57.65	66.58	22.96	35.88	25.44	--	0.0	--
Total	340	35,987	100.00	11,308	--	0.0	--	8.71	6.47	7.98	68.33	57.65	66.58	22.96	35.88	25.44	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2023 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 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 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
Minot MSA	37	2,639	29.84	--	--	0.0	--	2.61	5.41	--	94.04	91.89	--	3.36	2.70	--	--	0.0	--
ND Non-MSA	87	9,979	70.16	--	--	0.0	--	10.39	6.90	--	56.13	31.03	--	33.48	62.07	--	--	0.0	--
Total	124	12,618	100.00	--	--	0.0	--	8.31	6.45	--	66.27	49.19	--	25.42	44.35	--	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- 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
Bismarck MSA	225	13,023	100.00	5,547	79.77	79.56	55.63	8.41	20.00	11.82	0.44
Total	225	13,023	100.00	5,547	79.77	79.56	55.63	8.41	20.00	11.82	0.44

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 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 - 2023											
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
ND Non-MSA	340	35,987	100.00	11,308	77.03	71.76	52.73	9.79	28.24	13.18	0.0
Total	340	35,987	100.00	11,308	77.03	71.76	52.73	9.79	28.24	13.18	0.0

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2023 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 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
ND Non-MSA	340	35,987	100.00	11,308	77.03	71.76	52.73	9.79	28.24	13.18	0.0
Total	340	35,987	100.00	11,308	77.03	71.76	52.73	9.79	28.24	13.18	0.0

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Minot MSA	37	2,639	29.84	--	80.23	72.97	--	7.97	27.03	11.80	0.0
ND Non-MSA	87	9,979	70.16	--	78.15	66.67	--	9.08	33.33	12.77	0.0
Total	124	12,618	100.00	--	78.71	68.55	--	8.78	31.45	12.51	0.0

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

State of Minnesota

Assessment Area:	Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography												2022 - 2024						
	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	709	155,254	85.63	9,716	--	0.0	--	8.20	9.87	10.20	71.72	67.70	66.94	20.08	22.43	22.85	--	0.0	--
St. Cloud MSA	119	21,483	14.37	13,580	0.05	0.0	0.58	11.96	15.13	16.18	68.55	64.71	65.42	19.35	20.17	17.75	0.09	0.0	0.07
Total	828	176,737	100.00	23,296	0.03	0.0	0.34	10.21	10.63	13.68	70.02	67.27	66.05	19.69	22.10	19.88	0.05	0.0	0.04

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

Assessment Area:	Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography												2023 - 2024						
	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	
Minneapolis MSA	13	2,540	100.00	5,503	--	0.0	--	9.50	15.38	9.78	85.38	76.92	85.17	5.11	7.69	5.05	--	0.0	--
Total	13	2,540	100.00	5,503	--	0.0	--	9.50	15.38	9.78	85.38	76.92	85.17	5.11	7.69	5.05	--	0.0	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, 2024 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	709	155,254	85.63	9,716	16.63	4.94	8.00	18.82	14.95	19.43	23.05	19.18	20.12	41.50	54.16	38.09	--	6.77	14.36
St. Cloud MSA	119	21,483	14.37	13,580	18.55	2.52	9.48	18.57	21.01	26.27	24.11	23.53	23.43	38.77	42.02	26.26	--	10.92	14.57
Total	828	176,737	100.00	23,296	17.70	4.59	8.86	18.68	15.82	23.42	23.64	19.81	22.05	39.98	52.42	31.19	--	7.37	14.48

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 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																	2023 - 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
Minneapolis MSA	13	2,540	100.00	5,503	18.54	7.69	9.78	20.74	0.0	29.66	27.28	38.46	26.93	33.44	38.46	21.42	--	15.38	12.21
Total	13	2,540	100.00	5,503	18.54	7.69	9.78	20.74	0.0	29.66	27.28	38.46	26.93	33.44	38.46	21.42	--	15.38	12.21

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, 2024 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	89	5,086	90.82	5,130	--	0.0	--	13.66	13.48	12.59	68.17	75.28	64.97	18.17	11.24	22.44	--	0.0	--
St. Cloud MSA	9	535	9.18	5,970	0.17	0.0	0.49	12.23	0.0	14.76	66.39	77.78	64.34	17.44	22.22	18.14	3.78	0.0	2.28
Total	98	5,621	100.00	11,100	0.09	0.0	0.26	12.90	12.24	13.76	67.23	75.51	64.63	17.79	12.24	20.13	1.99	0.0	1.23

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- CRA 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																	2023 - 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	
Minneapolis MSA	2	52	100.00	1,586	--	0.0	--	13.05	0.0	9.65	77.76	100.00	86.07	9.19	--	4.29	--	0.0	--	
Total	2	52	100.00	1,586	--	0.0	--	13.05	0.0	9.65	77.76	100.00	86.07	9.19	--	4.29	--	0.0	--	

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 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	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate			
MN Non-MSA	89	5,086	90.82	5,130	79.90	85.39	55.83	9.33	14.61	10.78	0.0									
St. Cloud MSA	9	535	9.18	5,970	80.17	100.00	47.76	10.15	--	9.68	0.0									
Total	98	5,621	100.00	11,100	80.04	86.73	51.49	9.76	13.27	10.20	0.0									

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 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																	2023 - 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	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate			
Minneapolis MN MSA	2	52	100.00	1,586	83.71	100.00	53.03	7.32	--	8.97	0.0									
Total	2	52	100.00	1,586	83.71	100.00	53.03	7.32	--	8.97	0.0									

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, -- CRA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%