



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 22, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Heritage National Bank
Charter Number: 15037

24 2nd Street South
Long Prairie, MN 56347

Office of the Comptroller of the Currency

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The lending test is rated: Satisfactory

The community development test is rated: Outstanding

The major factors that support this rating include:

- A majority of the bank's loans were inside its assessment areas (AA).
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The distribution of loans throughout geographies of different income levels is excellent.
- The bank received no CRA related complaints.
- Community development (CD) performance shows excellent responsiveness to AA needs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

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

American Heritage National Bank (AHNB) had an average LTD ratio of 80.87 percent over the ten quarters since the previous CRA evaluation. The bank's LTD ratio showed increasing trends through the evaluation period due to loan growth. The bank's LTD ratio ranged from a low of 65.45 percent in the third quarter of 2022 to a high of 89.50 percent in the second quarter of 2024. The bank ranked third among five banks operating within at least one of the AHNB's AAs with total assets between \$300 million and \$980 million. Comparable banks had average LTD ratios between 76.61 percent and 102.34 percent.

Lending in Assessment Area

A majority of the bank's loans were inside its AAs. The bank originated 70.35 percent by number and 64.10 percent by dollar of its loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. To evaluate the bank's lending inside and outside its AAs, we sampled 64 business loans and analyzed all home mortgage loans using Home Mortgage Disclosure Act (HMDA) data for the evaluation period. Sample sizes were 20 business loans per AA for the St. Cloud and MN Non-MSA AAs. For the Minneapolis MSA AA, we reviewed the full population of 24 business loans, and we analyzed 2024 separate from 2022-2023 given there were significant changes to the AA in 2024.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	214	69.71	93	30.29	307	89,685	63.77	50,946	36.23	140,631
Small Business	47	73.44	17	26.56	64	21,641	65.47	11,416	34.53	33,058
Total	261	70.35	110	29.65	371	111,326	64.10	62,362	35.90	173,689

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

Description of Institution

AHNB is a single state national bank headquartered in Long Prairie, Minnesota (MN). AHNB is wholly owned by American Heritage Holding Company, a one bank holding company located in St. Cloud, MN. The bank does not have any affiliates or subsidiaries. The bank operates seven full-service branches in Minnesota. There was one change to the bank's branches since the prior CRA evaluation. The bank opened a new branch in Wayzata, MN in October 2023. For this evaluation, the bank had three AAs, and performance in the AAs was reflected in the state of Minnesota rating area.

The bank is a full-service community bank offering traditional products and services, such as consumer and business checking and savings accounts and retail and commercial lending products. As of December 31, 2024, the bank had total assets of \$557 million. The bank's loan portfolio totaled \$425 million and represented 76 percent of total assets. Business loans comprised 72 percent, home mortgages 26 percent, farm loans totaled one percent, and consumer loans totaled less one percent of the loan portfolio. Tier 1 capital totaled \$63.1 million.

The bank received a satisfactory rating at the prior CRA evaluation, dated September 19, 2022. There were no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated ANHB's performance using CRA intermediate small bank performance standards, which consisted of the lending test and CD test. The evaluation period was January 1, 2022, through December 31, 2024 for both tests. The lending test performance within the Minneapolis MSA AA was separated into two analysis periods, 2022-2023 and 2024, because the AA significantly expanded in 2024.

For the lending test, we selected the primary loan products for each AA based on the number and dollar volume of loan originations during the evaluation period. Business and home mortgage loans were the primary products in each AA because they represented the largest volumes. We used HMDA data to analyze home mortgage lending because we previously determined the data was accurate and reliable. We sampled business loans to evaluate business lending performance.

For the CD test, we reviewed CD loans, investments, and services submitted by bank management. Qualified activities are included in this evaluation.

Selection of Areas for Full-Scope Review

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

Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating was based on the rating for the state of Minnesota. Minnesota was the bank's only rating area and had multiple AAs. A state rating area with multiple AAs is based on the weighted conclusions in those AAs. Refer to the "Scope" section under the state rating section for details regarding how the AAs were weighted in arriving at the respective rating.

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 AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The distribution of loans throughout geographies of different income levels is excellent.
- CD performance shows excellent responsiveness to AA needs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Minnesota

During the evaluation period, AHNB had three AAs in Minnesota, which are referred to throughout this evaluation as the St. Cloud MSA, MN Non-MSA, and Minneapolis MSA AAs.

St. Cloud MSA

There are three branches within the AA, which include two branches in St. Cloud and one in Avon. During the evaluation period, the St. Cloud MSA AA included Benton and Stearns Counties, except for census tract (CT) 109.00 in the southwestern corner of Stearns County. The St. Cloud MSA AA consisted of 46 total CTs, which included one low-income, eight moderate-income, 29 middle-income, seven upper-income, and one unknown income level CTs. The bank's primary lending focus in the AA was business and home mortgage loans.

Competition within the bank's market was strong. The June 2024 FDIC Deposit Market Share Report showed 33 deposit-taking institutions with 59 locations in Stearns and Benton Counties. AHNB ranked sixth with a deposit market share of 4.12 percent. Competitors included community, regional, and large banks. The top three institutions by deposit share were Stearns Bank, Bremer Bank, and Wells Fargo. These institutions had a combined deposit market share of 44.33 percent.

We reviewed a community contact interaction that was completed during the evaluation period. The contact works at a CD organization that serves the St. Cloud MSA by providing small business financing and grants to local schools and nonprofits. The contact indicated that during the evaluation period, unemployment and poverty rates in the area were low. The housing market was difficult due to increasing home prices and inconsistencies in appraised value. The contact indicated needs and opportunities for home mortgage and business loans. The contact perceived moderate involvement by banks in community development and added that community banks tended to be more active in supporting the community than regional or nationwide banks.

The table below provides AA demographic and economic data.

Assessment Area - St. Cloud MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	2.17	17.39	63.04	15.22	2.17
Population by Geography	196,056	1.22	16.86	63.60	17.29	1.03
Housing Units by Geography	80,753	1.11	18.43	64.62	15.21	0.63
Owner-Occupied Housing by Geography	50,793	0.05	12.24	67.80	19.81	0.10
Occupied Rental Units by Geography	23,779	2.88	33.21	55.69	6.59	1.62
Vacant Units by Geography	6,181	3.06	12.39	72.80	10.58	1.16
Businesses by Geography	7,066	0.17	12.50	65.65	17.82	3.86
Farms by Geography	590	0.00	5.25	76.78	17.97	0.00
Family Distribution by Income Level	47,124	18.46	18.57	24.09	38.88	0.00
Household Distribution by Income Level	74,572	22.89	16.92	18.66	41.53	0.00
Unemployment rate (%)	4.64	4.19	8.53	3.43	4.19	17.49
Households Below Poverty Level (%)	10.69	54.29	20.15	8.93	2.59	40.92
Median Family Income (41060 - St. Cloud, MN MSA)		\$80,403		Median Housing Value		\$192,450
Median Family Income (41060 - St. Cloud, MN MSA) for 2024		\$97,800		Median Gross Rent		\$796
				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						

MN Non-MSA

The bank has two branches located within the AA. Branches are in Browerville and Long Prairie. During the evaluation period, the MN Non-MSA AA was comprised of six census tracts in Todd County, which included no low-income, one moderate-income tract, and five middle-income CTs. The bank’s primary lending focus in the AA was business and home mortgages.

Competition within the bank’s market was moderate. The June 2024 FDIC Deposit Market Share Report showed six deposit-taking institutions with ten locations in Todd County. AHNB ranked first with a deposit market share of 33.81 percent. Competitors included regional and community banks. The First International Bank & Trust and Minnesota National Bank held the second and third highest deposit shares. The top three institutions had a combined deposit market share of 69.38 percent.

We reviewed a community contact interaction that was completed during the evaluation period. The contact works at a small business development organization that serves the bank’s AA and several other counties in central Minnesota. The contact indicated local banks were meeting credit needs of the community. The contact stated there were opportunities for banks to provide general banking services to small businesses and financial literacy outreach to small businesses and consumers.

The table below provides AA demographic and economic data.

Assessment Area - MN Non-MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.00	16.67	83.33	0.00	0.00
Population by Geography	19,194	0.00	16.61	83.39	0.00	0.00
Housing Units by Geography	10,447	0.00	14.19	85.81	0.00	0.00
Owner-Occupied Housing by Geography	6,296	0.00	17.15	82.85	0.00	0.00
Occupied Rental Units by Geography	1,175	0.00	16.09	83.91	0.00	0.00
Vacant Units by Geography	2,976	0.00	7.16	92.84	0.00	0.00

Assessment Area - MN Non-MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Businesses by Geography	635	0.00	15.59	84.41	0.00	0.00
Farms by Geography	139	0.00	23.74	76.26	0.00	0.00
Family Distribution by Income Level	5,125	23.02	19.86	25.13	31.98	0.00
Household Distribution by Income Level	7,471	23.42	18.32	19.66	38.59	0.00
Unemployment rate (%)	4.26	0.00	4.95	4.12	0.00	0.00
Households Below Poverty Level (%)	12.56	0.00	19.31	11.17	0.00	0.00
Median Family Income (Non-MSAs - MN)		\$74,710			Median Housing Value	\$167,250
Median Family Income (Non-MSAs - MN) for 2024		\$90,300			Median Gross Rent	\$661
					Families Below Poverty Level	8.55
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 bank operates two branches in the AA. The Clearwater branch was in operation for the full evaluation period, while the Wayzata branch opened in October 2023. The Minneapolis MSA AA changed during the evaluation period when the bank expanded its AA due to the Wayzata branch opening. For this evaluation, the expanded AA delineation was considered for 2024 only since analysis was performed using calendar years.

For 2022 and 2023, the Minneapolis MSA AA consisted of portions of Sherburne and Wright Counties. There were four CTs in total, which included three in Sherburne County and one in Wright County. There were no low-income, one moderate-income, three middle-income, and no upper-income or unknown level CTs in the AA.

For 2024, the AA consisted of portions of Sherburne, Wright, and Hennepin Counties. There was a total of 74 CTs, which included no low-income, four moderate-income, 25 middle-income, 45 upper-income, and no unknown level income CTs. The partial addition of Hennepin County in 2024 expanded the AA significantly with 70 additional CTs.

The bank’s primary lending focus in the AA during the evaluation period was business and home mortgages. A small portion of the bank’s total deposits were from the Minneapolis MSA AA. Deposits from the AA totaled \$24 million and represented 5.0 percent of total deposits based on the June 2024 FDIC Deposit Market Share Report.

Competition within the bank’s market was strong. The June 2024 FDIC Deposit Market Share Report showed 84 deposit-taking institutions with 317 locations within Sherburne, Wright, and Hennepin Counties. AHNB ranked 76th with a deposit market share of 0.02 percent. Competitors included community, regional, and large banks. The top three institutions by deposit market share were U.S. Bank, Wells Fargo, and Ameriprise Bank. Those institutions had a combined deposit market share of 68.71 percent.

As part of this evaluation, we contacted a community member at an economic development organization serving Sherburne County. The organization supports business growth in the county through financing and technical assistance. The contact stated Sherburne County experienced population and business growth during the evaluation period. The contact indicated local banks generally met credit needs and

were active in the community, but there continued to be needs and opportunities for loans to small businesses and affordable housing. The contact perceived that people in the area generally preferred a local bank rather than a regional or nationwide bank.

We also reviewed a community contact interaction that was completed during the evaluation period. The contact worked at a community development organization that served the Twin Cities metropolitan area, including Hennepin County. The community contact noted that local lenders were responsive in helping meet the credit needs of the area. The contact identified small business loans as a primary credit need. The contact stated the local community has stabilized since the pandemic but has struggling to find skilled workers.

The tables below provide AA demographic and economic data for each analysis period.

Assessment Area - Minneapolis MSA						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.00	25.00	75.00	0.00	0.00
Population by Geography	19,659	0.00	38.64	61.36	0.00	0.00
Housing Units by Geography	8,174	0.00	38.81	61.19	0.00	0.00
Owner-Occupied Housing by Geography	5,153	0.00	22.39	77.61	0.00	0.00
Occupied Rental Units by Geography	2,376	0.00	79.67	20.33	0.00	0.00
Vacant Units by Geography	645	0.00	19.38	80.62	0.00	0.00
Businesses by Geography	618	0.00	18.45	81.55	0.00	0.00
Farms by Geography	63	0.00	11.11	88.89	0.00	0.00
Family Distribution by Income Level	4,934	25.84	20.65	23.57	29.94	0.00
Household Distribution by Income Level	7,529	29.31	18.00	19.39	33.30	0.00
Unemployment rate (%)	2.94	0.00	3.69	2.56	0.00	0.00
Households Below Poverty Level (%)	14.17	0.00	26.71	5.64	0.00	0.00
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)	\$103,977	Median Housing Value		\$272,200		
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2023	\$124,300	Median Gross Rent		\$1,007		
		Families Below Poverty Level		8.19		
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area - Minneapolis MSA						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	0.00	5.41	33.78	60.81	0.00
Population by Geography	325,638	0.00	6.06	29.21	64.73	0.00
Housing Units by Geography	136,313	0.00	7.00	31.48	61.52	0.00
Owner-Occupied Housing by Geography	97,723	0.00	3.79	29.05	67.15	0.00
Occupied Rental Units by Geography	31,917	0.00	16.77	38.38	44.85	0.00
Vacant Units by Geography	6,673	0.00	7.22	34.02	58.76	0.00
Businesses by Geography	18,932	0.00	2.29	35.65	62.06	0.00
Farms by Geography	609	0.00	2.63	28.74	68.64	0.00
Family Distribution by Income Level	87,866	13.13	13.97	17.98	54.92	0.00
Household Distribution by Income Level	129,640	17.21	14.04	16.02	LA.73	0.00
Unemployment rate (%)	2.68	0.00	3.72	3.00	2.44	0.00

Assessment Area - Minneapolis MSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Households Below Poverty Level (%)	5.17	0.00	14.49	5.55	3.92	0.00
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)		\$103,977		Median Housing Value		\$356,850
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2024		\$123,700		Median Gross Rent		\$1,403
				Families Below Poverty Level		3.13
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

The Minnesota state rating is based on the performance in the St. Cloud MSA, MN Non-MSA, and Minneapolis MSA AAs. The St. Cloud MSA AA and the MN Non-MSA AA were selected for full-scope reviews and the Minneapolis MSA AA was a limited-scope review. Performance in the St. Cloud MSA AA carried the most weight when determining the state rating, followed by the MN Non-MSA and the Minneapolis MSA AAs, respectively. The St. Cloud MSA AA represented the largest portion of the bank’s branches, deposits, and loan volume within the state. The St. Cloud MSA AA represented 67 percent of the bank’s deposits in 2024 and 74 percent of the bank’s loan originations during the evaluation period. The MN Non-MSA AA accounted for 28 percent of deposits and 18 percent of lending, and the Minneapolis MSA AA accounted for five percent of deposits and eight percent of lending. Refer to Appendix A for a list of the AAs under review.

In the St. Cloud MSA and Minneapolis MSA AAs, business and home mortgage lending performance were weighted equally because lending volumes between products were comparable. Specifically, home mortgage lending in each AA represented the majority by number and business lending represented the majority by dollar. In the MN Non-MSA AA, home mortgage lending performance was weighted more heavily than business lending performance because there was more home mortgage activity by dollar and number.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s lending performance in the state of Minnesota was reasonable.

Distribution of Loans by Income Level of the Geography

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

For the St. Cloud MSA AA, the bank's performance in moderate-income geographies carried more weight than performance in low-income geographies given the bank's AA included only one low-income CT and eight moderate-income CTs. For the MN Non-MSA and Minneapolis AAs, conclusions were based on lending in moderate-income geographies only since there were no low-income CTs in these AAs during the evaluation period.

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.

St. Cloud MSA

The bank exhibited excellent geographic distribution of home mortgage loans in the St. Cloud MSA AA. The bank's percentage of home mortgage loans in low- and moderate-income (LMI) CTs exceeded aggregate lending performance and the percentage of owner-occupied housing units (demographic comparator) in those geographies.

MN Non-MSA

The bank exhibited reasonable geographic distribution of home mortgage loans in the MN Non-MSA AA. The bank's percentage of home mortgage loans in moderate-income CTs was near aggregate lending and below the demographic comparator. More weight was placed on the bank's performance in comparison to aggregate lending because aggregate performance was more representative of the lending opportunities 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.

St. Cloud MSA

The bank exhibited excellent geographic distribution of business loans in the St. Cloud MSA AA. The bank's percentage of business loans in moderate-income CTs exceeded aggregate lending performance and the percentage of businesses (demographic comparator) in moderate-income geographies. The bank did not make any business loans in the one low-income CT within the AA, which was reasonable given there were minimal lending opportunities as evidenced by the low aggregate and demographic comparators each at 0.49 percent.

MN Non-MSA

The bank exhibited excellent geographic distribution of business loans in the MN Non-MSA AA. The bank's percentage of business loans in moderate-income CTs exceeded aggregate lending performance and the demographic comparator.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

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.

St. Cloud MSA

The bank exhibited poor distribution of home mortgage loans to individuals of different income levels in the St. Cloud MSA AA. The bank's percentage of home mortgage loans to LMI borrowers was significantly below the percentage of LMI families and aggregate lending to LMI borrowers in the AA.

MN Non-MSA

The bank exhibited reasonable distribution of home mortgage loans to individuals of different income levels in the MN Non-MSA AA. The bank's percentage of home mortgage loans to low-income borrowers was below the demographic and aggregate lending comparators. Within the AA, 8.55 percent of families are in poverty. Families in poverty were less likely to be able to afford a home, which limited lending opportunities to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers was near the demographic and aggregate lending comparators.

Small Loans to Businesses

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

St. Cloud MSA

The bank exhibited excellent distribution of loans to businesses of different sizes in the St. Cloud MSA AA. The bank's percentage of loans to small businesses significantly exceeded aggregate lending to small businesses and was below the percentage of small businesses in the AA. We placed more weight on the bank's performance in comparison to aggregate lending since it was more representative of lending opportunities.

MN Non-MSA

The bank exhibited excellent distribution of loans to businesses of different sizes in the MN Non-MSA AA. The bank's percentage of loans to small businesses exceeded aggregate lending to small businesses and was near the percentage of small businesses in the AA. We placed more weight on the bank's performance in comparison to aggregate lending since it was more representative of lending opportunities.

Responses to Complaints

The bank received no CRA related complaints since the prior CRA evaluation.

Conclusions for Area Receiving a Limited Scope Review

The bank did not originate a sufficient volume of home mortgage or business loans in the Minneapolis MSA AA to conduct a meaningful analysis. For home mortgage, the bank made six loans inside the AA for 2022-2023 and eight loans in 2024. For business, the bank made eight business loans inside the AA during 2022-2023 and five in 2024.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AAs. The bank exhibited excellent responsiveness in the St. Cloud MSA and adequate responsiveness in the MN Non-MSA AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
St Cloud MSA	9	56.25	8,359	97.11
MN Non-MSA	7	43.75	249	2.89
Minneapolis MSA	0	0.00	0	0.00

St. Cloud MSA

The bank originated nine CD loans totaling \$8.36 million, which represented 19.84 percent of allocated tier one capital, in the St. Cloud MSA during the evaluation period. These CD loans supported economic development. Allocated capital was calculated using tier 1 capital, as of December 31, 2024, multiplied by the deposit percentage in the AA, based on deposit data from the June 2024 FDIC Deposit Market Share Report.

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

- A \$4.24 million SBA 504 loan to a small business to promote economic development in St. Cloud.
- A \$40 thousand loan to a small business in a moderate-income CT, which helped support job creation for LMI individuals.

MN Non-MSA

The bank originated seven CD loans totaling \$249 thousand in the MN Non-MSA during the evaluation period, which represented 1.40 percent of allocated capital. These CD loans supported economic development.

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

- A \$50 thousand loan to a small farm located in a moderate-income CT to fund crop inputs.
- A \$27 thousand loan to a small farm located in a moderate-income CT to purchase a tractor for farm work.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
St. Cloud MSA	0	0	12	3,245	12	60.00	3,245	99.75	0	0
MN Non-MSA	0	0	5	2	5	25.00	2	0.07	0	0
Minneapolis MSA	0	0	0	0	0	0	0	0.00	0	0
Broader Statewide or Regional Area	0	0	3	6	3	15.00	6	0.18	0	0
Total	0	0	20	3,253	20	100.00	3,253	100.00	0	0

St Cloud MSA AA

AHNB made 12 qualified investments totaling \$3.25 million, or 7.70 percent of allocated capital, in the St. Cloud MSA AA during the evaluation period. Qualified investments were comprised of \$3.22 million in investments and \$22 thousand in donations. Qualified investments supported affordable housing for LMI individuals and economic development.

The following are examples of qualified investments in the AA:

- A \$1.19 million investment in a pool of mortgage-backed securities that supported affordable housing for LMI individuals in Stearns County.
- A \$2 thousand donation to a community development organization that supported economic development by providing technical assistance to small businesses in the St. Cloud area.

MN Non-MSA AA

AHNB made 5 qualified investments totaling \$2.2 thousand or 0.01 percent of allocated capital in the MN Non-MSA AA during the evaluation period. Qualified investments were comprised entirely of donations. Donations primarily supported economic development in LMI areas.

The following is an example of qualified investment in the AA:

- A \$500 dollar donation to an organization that supported economic and community development in Todd County through education, training, and other technical assistance for small businesses.

Broader Statewide and Regional Area

AHNB made three qualified donations totaling \$6 thousand to an organization that supports economic development in 14 counties in central Minnesota, including counties in each of the bank's AAs.

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

Extent to Which the Bank Provides Community Development Services

St Cloud MSA

Four employees provided 348 hours of CD service to three organizations in the St Cloud MSA AA. Organizations served promoted economic development and provided community services for LMI individuals. For example, one employee served at a local city chamber of commerce as a committee member and helped select candidates for a leadership development program that provided technical assistance to small businesses.

MN Non-MSA

Three employees provided 756 hours of CD service to four organizations in the MN Non-MSA AA. Organizations served promoted economic development and provided community services for LMI individuals. Strong leadership is evident through board participation in each of those activities. For example, one employee served as board chairman for a county development corporation that provided financing and technical assistance to small businesses.

Broader Statewide and Regional Area

Two employees provided 185 hours of CD service to an organization supporting economic development in 14 counties in central Minnesota, including counties in each of the bank's AAs. The organization provided business loans and bank employees served on the organization's loan review committee.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Minneapolis MSA AA was weaker than the bank's overall performance under the CD Test in the full-scope areas. The bank did not originate any CD loans or make qualified investments in the Minneapolis MSA AA during the evaluation period. Two employees provided 360 hours of CD service to three different organizations supporting economic development in the Minneapolis MSA AA. The employees served in leadership roles at city and county economic development authorities in Sherburne and Wright Counties.

Appendix A: Scope of Examination

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

Time Period Reviewed:	12/01/2022-12/31/2024	
Bank Products Reviewed:	Home mortgage and small business loans Community development loans, qualified investments, and community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota:		
St. Cloud MSA	Full-scope	Benton County Stearns County (partial) Includes CTs: 3.01, 3.02, 4.01, 4.02, 5, 6.01, 6.02, 7.01, 8.01, 9.01, 10.01, 101.01, 101.02, 102, 104.01, 104.02, 104.03, 105, 106, 110, 111, 112, 113.01, 113.02, 113.04, 114, 115, 116
MN Non-MSA	Full-scope	Todd County (partial) Includes CTs: 7903, 7904, 7905, 7906, 7907, 7908
Minneapolis MSA	Limited-scope	Sherburne County (partial) Includes 3 CTs: 303.01, 303.02, 315 Wright County (partial) Includes 1 CT: 1003 Hennepin (partial) --- 2024 ONLY Includes 70 CTs: 0232.01, 0233.00, 0234.01, 0261.04, 0262.01, 0262.02, 0262.05, 0262.06, 0262.07, 0262.08, 0263.01, 0263.02, 0264.03, 0264.04, 0264.05, 0264.06, 0265.05, 0265.07, 0265.08, 0265.09, 0265.10, 0265.11, 0265.14, 0265.15, 0265.16, 0266.05, 0266.06, 0266.09, 0266.10, 0266.11, 0266.14, 0266.15, 0266.16, 0266.17, 0267.07, 0267.08, 0267.11, 0267.12, 0267.13, 0267.17, 0267.18, 0267.19, 0267.20, 0267.21, 0267.22, 0267.23, 0267.24, 0267.25, 0267.26, 0269.10, 0269.11, 0269.12, 0270.01, 0270.02, 0271.01, 0271.02, 0272.02, 0272.03, 0272.04, 0272.05, 0273.00, 0274.00, 0275.01, 0275.03, 0275.04, 0276.01, 0276.02, 0277.01, 0277.02, 0277.03

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
American Heritage National Bank	Satisfactory	Outstanding	Satisfactory
State:			
Minnesota	Satisfactory	Outstanding	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of 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 Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/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.

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

Minnesota

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate			
MN Non-MSA	22	4,517	11.00	1,063	0.00	0.00	0.00	17.15	9.09	12.04	82.85	90.91	87.96	0.00	0.00	0.00	0.00	0.00	0.00			
St. Cloud MSA	178	77,164	89.00	13,580	0.05	7.30	0.58	12.24	21.35	16.18	67.80	44.38	65.42	19.81	26.97	17.75	0.10	0.00	0.07			
Total	200	81,681	100.00	14,643	0.05	6.50	0.53	12.79	20.00	15.52	69.46	49.50	67.80	17.63	24.00	16.09	0.09	0.00	0.06			

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																				2022 - 2023		
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			
Minneapolis MSA	6	3,413	100.00	1,054	0.00	0.00	0.00	22.39	16.67	26.00	77.61	83.33	74.00	0.00	0.00	0.00	0.00	0.00	0.00			
Total	6	3,413	100.00	1,054	0.00	0.00	0.00	22.39	16.67	26.00	77.61	83.33	74.00	0.00	0.00	0.00	0.00	0.00	0.00			

Source: FFIEC File - 2020 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																				2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$ (000s)	% 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	8	4,591	100.00	8,841	0.00	0.00	0.00	3.79	12.50	3.79	29.05	37.50	25.73	67.15	50.00	70.48	0.00	0.00	0.00			
Total	8	4,541	100.00	8,841	0.00	0.00	0.00	3.79	12.50	3.79	29.05	37.50	25.73	67.15	50.00	70.48	0.00	0.00	0.00			

Source: FFIEC File - 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																			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	22	4,517	11.00	1,063	23.02	4.55	14.68	19.86	18.18	23.99	25.13	27.27	22.67	31.98	45.45	27.85	0.00	4.55	10.82		
St. Cloud MSA	178	77,164	89.00	13,580	18.46	3.93	9.48	18.57	8.99	26.27	24.09	8.99	23.43	38.88	25.84	26.26	0.00	52.25	14.56		
Total	200	81,681	100.00	14,643	18.91	4.00	10.14	18.70	10.00	26.14	24.19	11.00	23.26	38.20	28.00	26.04	0.00	47.00	14.42		

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		
Minneapolis MSA	6	3,413	100.00	1,054	25.84	0.00	18.79	20.65	50.00	29.13	23.57	0.00	20.97	29.94	0.00	18.41	0.00	50.00	12.71		
Total	6	3,413	100.00	1,054	25.84	0.00	18.79	20.65	50.00	29.13	23.57	0.00	20.97	29.94	0.00	18.41	0.00	50.00	12.71		

Source: FFIEC File - 2020 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				
	#	\$ (000s)	% 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	8	4,591	100.00	8,841	13.13	0.00	5.34	13.97	37.50	15.48	17.98	0.00	20.22	54.92	50.00	45.23	0.00	12.50	13.59		
Total	8	4,591	100.00	8,841	13.13	0.00	5.34	13.97	37.50	15.48	17.98	0.00	20.22	54.92	50.00	45.23	0.00	12.50	13.59		

Source: FFIEC File - 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				
	#	\$ (000s)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
MN Non-MSA	20	3,380	50.00	337	0.00	0.00	0.00	15.59	20.00	13.65	84.41	80.00	86.35	0.00	0.00	0.00	0.00	0.00	0.00		
St. Cloud MSA	20	19,965	50.00	5,970	0.49	0.00	0.49	12.50	15.00	14.76	65.65	60.00	64.34	17.59	25.00	18.14	3.86	0.00	2.28		
Total	40	23,345	100.00	6,307	0.16	0.00	0.45	12.75	17.50	14.70	67.20	70.00	65.51	16.35	12.50	17.17	3.54	0.00	2.16		

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				
	#	\$ (000s)	% 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	8	3,351	100.00	516	0.00	0.00	0.00	24.31	0.00	15.50	75.69	100.00	84.50	0.00	0.00	0.00	0.00	0.00	0.00		
Total	8	3,351	100.00	516	0.00	0.00	0.00	24.31	0.00	15.50	75.69	100.00	84.50	0.00	0.00	0.00	0.00	0.00	0.00		

Source: FFIEC File - 2020 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				
	#	\$ (000s)	% 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	5	2,235	100.00	516	0.00	0.00	--	2.29	0.00	--	35.65	60.00	--	62.06	40.00	--	0.00	0.00	--		
Total	5	2,235	100.00	516	0.00	0.00	--	2.29	0.00	--	35.65	60.00	--	62.06	40.00	--	0.00	0.00	--		

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		
	#	\$ (000s)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MN Non-MSA	20	3,380	50.00	337	87.09	75.00	55.19	2.99	15.00	9.92	10.00
St. Cloud MSA	20	19,965	50.00	5,970	85.42	65.00	47.76	4.94	35.00	9.64	0.00
Total	40	23,345	100.00	6,307	85.56	70.00	48.15	4.78	25.00	9.66	5.00

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		
	#	\$ (000s)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	8	3,351	100.00	516	86.73	75.00	53.10	7.12	25.00	6.15	0.00
Total	8	3,351	100.00	516	86.73	75.00	53.10	7.12	25.00	6.15	0.00

Source: FFIEC File - 2020 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		
	#	\$ (000s)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	5	2,325	100.00	--	81.98	80.00	--	9.97	20.00	8.25	0.00
Total	5	2,235	100.00	--	81.98	80.00	--	9.97	20.00	8.25	0.00

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%