PUBLIC DISCLOSURE

July 10, 2023

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Think Mutual Bank
Charter Number: 718037

5200 Members Parkway NW
Rochester, MN 55903

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

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

The following table indicates the performance level of Think Mutual Bank (Think) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Think Mutual 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 performance is good. Think demonstrates excellent lending activity, good borrower distribution, and adequate geographic distribution. Community development (CD) lending had a neutral impact on the Lending Test performance.

- The Investment Test performance is good. Think made a significant level of qualified CD investments and donations during the evaluation period. Qualified investments demonstrate adequate responsiveness to identified needs in the bank's assessment areas (AA).

- The Service Test performance is good. Branches are accessible to geographies and individuals of different income levels. Branch closures did not adversely affect accessibility. Employees provided a relatively high level of qualified CD services.

Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated and purchased 75.7 percent by number and 79.7 percent by dollar of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level.

The table on the following page shows the lending volume inside and outside the AAs during the evaluation period.

Lending Inside and Outside of the Assessment Area									
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	5,272	79.2	1,387	20.8	6,659	1,233,157	81.0	288,570	19.0	1,521,726
Small Business	1,781	90.4	189	9.6	1,970	87,524	92.5	7,071	7.5	94,595
Consumer	12,002	72.6	4,527	27.4	16,529	205,029	68.5	94,074	31.5	299,103
Total	**19,055**	**75.7**	**6,103**	**24.3**	**25,158**	**1,525,710**	**79.7**	**389,715**	**20.3**	**1,915,424**

The bank's performance lending inside the AAs did not present a concern and as such had a neutral impact on the geographic distribution analysis under the Lending Test.

Description of Institution

Think is single-state mutual thrift headquartered in Rochester, Minnesota. The bank currently operates eight branches and 15 automated teller machines (ATM) in the state of Minnesota, throughout the Rochester and Minneapolis metro areas. ATMs are cash dispensing only and do not accept deposits. At the beginning of the evaluation period, Think had ten branches, which included six in Rochester and four in the Minneapolis metro area. During evaluation period, Think closed two branches, one in Rochester and one in St. Paul, and opened no new branches.

For CRA purposes, Think operates in one rating area and two AAs. The rating area is the State of Minnesota. The AAs are referred to as Rochester and Minneapolis throughout this evaluation. While the Minneapolis AA is within a multistate metropolitan statistical area (MMSA), Think's delineated AA includes portions only in Minnesota.

During the evaluation period, Think offered a variety of different loan products, although focus was primarily on 1-4 family residential home loans and consumer loans. As of December 31, 2021, net loan and leases totaled $1.2 billion, which represented 53.8 percent of total assets. The loan portfolio was primarily comprised of home mortgage loans (76.1 percent), followed by consumer loans (13.1 percent) and business loans (10.8 percent) based on total commitment by dollar. Tier 1 capital was $315.3 million, resulting in a Tier 1 leverage ratio of 14.5 percent.

Think received a Satisfactory rating at the prior CRA evaluation on July 27, 2020. Performance in the Lending, Investment, and Service Tests were rated High Satisfactory. There are no known legal or financial factors impacting the bank's ability to meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Think was evaluated using the Large Bank performance criteria, which consists of Lending, Investment, and Service Tests. The evaluation period for this performance evaluation is January 1, 2019 through December 31, 2021. We reviewed home mortgage, small loans to businesses, and consumer loans reported by the bank in its Home Mortgage Disclosure Act (HMDA) and CRA loan application registers (LAR) during the evaluation period. In preparation for this evaluation, we conducted a targeted data

integrity examination and validated HMDA and CRA data was accurate, reliable, and could be used for our analysis.

During this evaluation, we also reviewed CD loans, investments, and services for the evaluation period. We analyzed each CD activity submitted by bank management to determine if it qualified as CD under the regulatory definitions in effect at the time the CD activity occurred.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state must be selected for a full-scope review. For purposes of this evaluation, both of the bank's AAs received a full-scope review. Refer to the "Scope" section under the State Rating section for details regarding how full-scope AAs were selected.

Ratings

The bank's overall rating is based entirely on the State of Minnesota since it is the bank's only rating area. The state rating is based on performance in the Rochester and Minneapolis AAs. Refer to the "Scope" section under the State Rating section for details regarding how the AAs were weighted in arriving at the respective ratings.

Home mortgage loans received the most weight, followed by consumer loans, and then business loans, when determining the Lending Test conclusions. Home mortgage loans were weighted most heavily because the loan category represented the largest portion of total loan originations and purchases during the evaluation period. Home mortgage loans represented 81.0 percent by dollar and 27.7 percent by number of total originations. Consumer loans received the next most weight and represented 63.1 percent by number and 13.4 percent by dollar of total originations. Business loans received the least weight and represented 9.2 percent by number and 5.6 percent by dollar. The bank did not originate or purchase small loans to farms during the evaluation period.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Minnesota

CRA rating for the State of Minnesota: 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 in the bank's AAs.

- The bank exhibits good distribution of loans to borrowers of different income levels and businesses of different sizes.

- Think exhibits adequate distribution of loans throughout geographies of different income levels.

- Think made a low level of CD loans.

- The bank had a significant level of qualified CD investments and donations.

- Think's service delivery systems are accessible to geographies and individuals of different income levels. Branch closures did not adversely affect accessibility.

- Services and branch hours do not vary in a way that inconveniences the AAs.

- Think employees provided a relatively high level of CD services to qualified organizations.

Description of Institution's Operations in Minnesota

Rochester AA
The Rochester AA consists of Olmsted and Dodge Counties, four census tracts (CT) in the western half of Wabasha County and two CTs in northwest Fillmore County. This portion of the AA is within the Rochester metropolitan statistical area (MSA). Additionally, the AA includes three CTs in the southern portion of Goodhue County and two CTs in northern Mower County. Goodhue and Mower Counties are in the non-MSA portion of Minnesota, outside the Rochester MSA. The addition of the five CTs from the non-MSA is not substantially extending beyond an MSA boundary and the AA is legal. It is reasonable to include these CTs given the proximity to the bank's branches. In the Rochester AA, Think operated six full-service branches in Rochester from 2019 through June 2021 and then five branches following the closure of the IBM Rochester branch in July 2021. Rochester branches account for 60.0 or 62.5 percent of the bank's total branch locations, depending on the date. There were 12 non-deposit-taking ATM locations in the AA as of December 31, 2021. Ten ATMs were in Rochester, one in Stewartville, and one in Byron.

The FDIC Deposit Market Share report as of June 30, 2021, indicated that Think had $1.5 billion of deposits within the AA. This accounted for 85.2 percent of the bank's total deposits. Think had a deposit market share of 16.4 percent, ranking first amongst 45 deposit-taking institutions in this AA. The competitors with the next largest deposit market shares included Wells Fargo (15.6 percent), U.S. Bank (7.8 percent), and Bremer Bank (6.0 percent).

Think's lending in the Rochester AA comprised 72.4 percent of its total lending during the evaluation period by number and 72.7 percent by dollar. Within the AA, consumer and home mortgage loans are the primary loan products. Consumer loans represented 64.0 percent by number and 12.9 percent by dollar of total loans made within the AA. Home mortgage lending represented 28.3 percent by number and 82.4 percent by dollar of total loans in the AA. Business lending represented 7.7 percent by number and 4.6 percent by dollar of all loans originated within the AA.

We completed one new community contact as part of this evaluation to better understand the credit needs within the AA. We contacted the president of a community development group serving the Rochester area. The contact stated the economy in the AA is strong and is driven heavily by healthcare, specifically Mayo Clinic, manufacturing, and education. The contact explained the primary credit needs in the area during the evaluation period were home mortgages and small business loans. The biggest challenge the Rochester AA faces is affordable housing. The contact stated that they have strong working relationships with several area banks, including Think. As part of this evaluation, we also reviewed four prior community contact forms that were completed within the evaluation period. These contacts also identified home mortgages and small business lending as credit needs and affordable housing as a primarily challenge that impacted the Rochester community during the evaluation period.

The following table provides information on the demographic composition of the Rochester AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester 2019-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	0.0	18.4	55.1	26.5	0.0
Population by Geography	210,934	0.0	18.4	51.0	30.6	0.0
Housing Units by Geography	87,784	0.0	19.6	51.7	28.7	0.0
Owner-Occupied Units by Geography	62,533	0.0	14.5	52.5	33.0	0.0
Occupied Rental Units by Geography	19,789	0.0	34.9	48.2	16.9	0.0
Vacant Units by Geography	5,462	0.0	23.0	55.2	21.9	0.0
Businesses by Geography	16,694	0.0	17.9	51.8	30.3	0.0
Farms by Geography	1,390	0.0	3.7	72.0	24.3	0.0
Family Distribution by Income Level	55,796	17.7	17.7	23.8	40.7	0.0
Household Distribution by Income Level	82,322	21.8	15.8	19.0	43.4	0.0
Median Family Income MSA - 40340 Rochester, MN MSA		$81,036	Median Housing Value			$180,710
Median Family Income Non-MSAs - MN		$63,045	Median Gross Rent			$820
			Families Below Poverty Level			5.3%

Minneapolis AA

For 2019 and 2020, the Minneapolis AA consisted of Carver, Dakota, Hennepin, Ramsey, Scott, and Washington Counties. There were four branches in the AA, which were in Apple Valley, Eagan, Edina, and St. Paul. The Minneapolis AA branches represented 40.0 percent of the bank's overall branch network. In 2021, the Minneapolis AA was reduced to Dakota and Hennepin Counties. The St. Paul branch closed in July 2021. The three remaining branches in the AA accounted for 37.5 percent of the bank's overall branch network.

The FDIC Deposit Market Share report as of June 30, 2021 indicated that Think had $268.0 million in deposits in the AA, which represented 14.8 percent of the bank's total deposits. The bank's deposit market share was 0.2 percent in the AA, ranking 27th among 84 deposit-taking institutions. The banks with the largest deposit market share in the AA included Wells Fargo Bank (40.3 percent), U.S. Bank (24.6 percent), and Ameriprise Bank (6.1 percent).

Think's lending in the Minneapolis AA comprised 27.6 percent of its total lending during the evaluation period by number and 27.3 percent by dollar. Think's primary loan products in the AA are home mortgage and consumer loans. Consumer loans represent 60.4 percent by number and 14.8 percent by dollar of loans in the AA. Home mortgage loans represent 25.9 percent by number and 76.5 percent by dollar of loans in the AA. Business loans represent 13.6 percent by number and 8.7 percent by dollar of loans within the AA.

We completed one new community contact as part of this evaluation to better understand the credit needs within the AA. The contact is a director at the Dakota County Community Development Agency. The contact stated the AA economy is strong with low levels of unemployment, diverse business sector, and educated labor force. However, the level of low- and moderate-income (LMI) people in the area has been increasing. The contact discussed opportunities for banks to continue providing community development support, affordable home mortgages, and loans to small businesses. The contact indicated that large and regional banks tend to dominate the market for affordable housing projects. The contact also shared that the pandemic negatively impacted downtown Minneapolis with several commercial offices still vacant. The contact indicated suburbs generally benefited economically from the pandemic with more people working from home and spending money in the local community rather than in downtown areas where they historically commuted for work. As part of this evaluation, we also reviewed five previously completed community contact reports from within the evaluation period. These community contacts commonly stated a need for affordable housing and loans to small businesses.

The tables on the following page provide information on the demographic composition of the Minneapolis AA during the evaluation period. Given the changes in AA delineation during the period, two tables are presented.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis 2019-2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	621	8.7	21.1	39.8	29.3	1.1
Population by Geography	2,613,350	7.3	18.9	40.0	33.4	0.4
Housing Units by Geography	1,077,958	6.8	19.5	41.5	31.8	0.4
Owner-Occupied Units by Geography	685,890	2.7	14.5	43.1	39.6	0.1
Occupied Rental Units by Geography	339,787	14.2	29.0	38.6	17.2	1.0
Vacant Units by Geography	52,281	11.1	23.0	39.6	25.4	0.9
Businesses by Geography	269,484	5.8	16.7	40.8	36.3	0.3
Farms by Geography	5,566	2.5	11.9	45.6	39.9	0.1
Family Distribution by Income Level	641,277	20.6	16.7	21.3	41.5	0.0
Household Distribution by Income Level	1,025,677	24.4	16.0	17.9	41.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		$84,589	Median Housing Value			$236,994
			Median Gross Rent			$965
			Families Below Poverty Level			7.4%

Source: 2015 ACS and 2020 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	394	7.9	21.1	41.1	29.2	0.8
Population by Geography	1,606,232	7.3	19.3	39.6	33.5	0.4
Housing Units by Geography	680,398	6.8	19.8	41.2	31.6	0.6
Owner-Occupied Units by Geography	424,346	2.4	15.0	42.4	40.1	0.1
Occupied Rental Units by Geography	222,316	14.4	28.5	39.2	16.4	1.5
Vacant Units by Geography	33,736	10.8	23.2	39.2	25.4	1.4
Businesses by Geography	195,332	5.8	16.3	40.9	36.6	0.5
Farms by Geography	3,513	2.6	14.2	44.3	38.8	0.1
Family Distribution by Income Level	392,723	20.4	16.5	21.0	42.1	0.0
Household Distribution by Income Level	646,662	24.4	16.0	17.8	41.7	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		$84,589	Median Housing Value			$243,073
			Median Gross Rent			$982
			Families Below Poverty Level			7.3%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Minnesota

The rating for the state of Minnesota is based on the performance of the Rochester and Minneapolis AAs. Each AA received a full-scope review. Performance in the Rochester AA received more weight than performance in the Minneapolis AA. The Rochester AA accounted for a higher portion of lending activity, deposits, and branches during the evaluation period. The Rochester AA represented 72.4 percent of total loans by number from 2019-2021, 85.2 percent of total deposits as of June 30, 2021, and 60.0 percent of branches at the beginning of the evaluation period.

As previously discussed under the Scope of Evaluation section, home mortgage loans received the most weight, followed by consumer loans, and then business loans, when determining the Lending Test conclusions. Farm loans were not included within this analysis because Think did not originate or purchase farm loans during the evaluation period.

For the Lending Test, retail lending performance was split into two analysis periods, 2019-2020 and 2021, due to changes in the Minneapolis AA delineation during the evaluation period. The lending performance in 2019-2020 received more weight than 2021 because it accounted for a longer time and larger loan volume. Think originated 71.9 percent of its total loans by number in 2019-2020 and 28.1 percent in 2021.

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 Areas Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Rochester and Minneapolis AAs are good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Consumer	Community Development	Total	%State Loans	%State Deposits
Minneapolis	1,365	717	0	3,180	1	5,263	27.6	14.8
Rochester	3,907	1,064	0	8,822	2	13,795	72.4	85.2

Dollar Volume of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Consumer	Community Development	Total	%State* Loans	%State Deposits
Minneapolis	318,207	36,330	0	61,444	5,420	421,401	27.3	14.8
Rochester	914,950	51,194	0	143,585	2,261	1,111,990	72.7	85.2

Rochester AA
The level of lending activity in the Rochester AA is excellent. During the evaluation period, the bank originated a substantial volume of loans by number and dollar, specifically home mortgage and consumer loans, as reflected in the tables above. Think's lending market share and rank are excellent in relation to its deposit market share. Based on the FDIC Deposit Market Share Report from June 30, 2021, there were 45 deposit taking institutions with one or more banking offices in the Rochester AA. Think ranked first with a deposit market share of 16.4 percent. Aggregate home mortgage data for 2021 indicates Think had 10.4 percent of the home mortgage lending market share, which is below its deposit market share. However, Think ranked first out of 315 lenders that reported home mortgages. Think's ranking as the top mortgage lender in the AA indicates excellent lending activity. Aggregate data for small loans to businesses in 2021 indicates Think had a market share of 15.1 percent and ranked second out of 78 lenders that reported small loans to businesses in the AA. Think's business lending share was near its deposit share and coupled with its ranking supports excellent performance. Think originated no farm loans during the evaluation period. Think has strategically chosen not to offer farm loans. Aggregate consumer loan data is not available.

Minneapolis AA
The level of lending activity in the Minneapolis AA is excellent. During the evaluation period, the bank originated a large volume of loans by number and dollar, specifically home mortgage and consumer loans, as reflected in the tables above. Think's lending market share was excellent compared to its deposit market share in the AA. Based on the FDIC Deposit Market Share Report from June 30, 2021, there were 84 deposit taking institutions with one or more banking offices in the Minneapolis AA. Think ranked 27th with a deposit share of 0.2 percent. Think's market share for small loans to businesses and home mortgage loans exceeded its deposit share in the AA. Aggregate home mortgage data for 2021 indicates Think had a market share of 0.3 percent and ranked 60 out of 589 lenders that reported home mortgage loans. Aggregate data for small loans to business in 2021 indicates Think had a market share of 1.1 percent and ranked 17 out of 196 lenders that reported small business loans in the AA. Think originated no farm loans during the evaluation period. Think has strategically chosen not to offer farm loans. Aggregate consumer loan data is not available.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

There were no low-income geographies in the Rochester AA during the evaluation period. Our geographic distribution analysis in this AA is based on lending within moderate-income geographies. The Minneapolis AA contained both low-income and moderate-income geographies.

Home Mortgage Loans

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

Rochester AA
The geographic distribution of home mortgage loans in different income level geographies in the Rochester AA is adequate. In 2019-2020, Think's home mortgage lending in moderate-income geographies was lower than the demographic comparator, which is the percentage of owner-occupied housing units in moderate-income geographies, and somewhat lower than aggregate lending performance in moderate-income geographies. In 2021, Think's home mortgage lending in moderate-

income geographies was near the demographic and aggregate lending performance in moderate-income geographies.

Minneapolis AA
The geographic distribution of home mortgage loans in different income level geographies in the Minneapolis AA is adequate. In 2019-2020, Think's home mortgage lending in low-income geographies was lower than the demographic comparator, the percentage of owner-occupied housing units in low-income geographies, and lower than aggregate lending performance in low-income geographies. Think's home mortgage lending in moderate-income geographies was lower than the percentage of owner-occupied housing units in moderate-income geographies and somewhat lower than aggregate lending performance in moderate-income geographies. In 2021, Think's home mortgage lending in low-income geographies was lower than the demographic and aggregate lending comparators. Think's home mortgage lending in moderate-income geographies was somewhat lower than the demographic comparator and aggregate lending performance in moderate-income geographies.

During 2019-2020, the bank's St. Paul branch in Ramsey County was near several LMI geographies. However, competition in the area was significant. Additionally, the St. Paul branch was temporarily closed in March 2020 due to the pandemic and remained closed until it was permanently closed in July 2021. The bank's AA was much smaller for 2021 and proximity to low-income geographies was affected. The nearest low-income geography in the bank's AA for 2021 was about nine miles or 20 minutes from the closest branch. Other banks operate in and nearby those low-income areas. This context provides a reasonable explanation for Think's lower performance in low-income geographies.

Small Loans to Businesses

Refer to Table Q 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.

Rochester AA
The geographic distribution of small loans to businesses in different income level geographies in the Rochester AA is good. In 2019-2020, Think's small loans to businesses in moderate-income geographies was near the demographic comparator, which is the percentage of businesses in moderate-income geographies. Think's performance was also near the aggregate lending performance in moderate-income geographies. In 2021, Think's small loans to businesses in moderate-income geographies was near the demographic comparator and somewhat lower than aggregate lending.

Minneapolis AA
The geographic distribution of small loans to businesses in different income level geographies in the Minneapolis AA is adequate. In 2019-2020, Think's small loans to businesses in low-income geographies was lower than the demographic comparator of businesses in low-income geographies and lower than aggregate lending to low-income geographies. In 2021, Think's small loans to businesses in low-income geographies exceeded the demographic and aggregate comparators. In 2019-2020, Think's small loans to businesses in moderate-income geographies was lower than the demographic comparator of businesses in moderate-income geographies and lower than aggregate lending in moderate-income geographies. In 2021, Think's small loans to businesses was somewhat lower than the demographic and aggregate comparators.

Consumer Loans

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

<u>Rochester AA</u>
The geographic distribution of consumer loans in different income level geographies in the Rochester AA is adequate. The bank's consumer lending in moderate-income geographies for 2019-2020 and 2021 was somewhat lower than the demographic comparator, which is the percentage of households in moderate-income geographies. There is no aggregate lending data available for consumer loans. The bank's branches are near several moderate-income geographies.

<u>Minneapolis AA</u>
The geographic distribution of consumer loans in different income level geographies in the Minneapolis AA is poor. In 2019-2020 and 2021, Think's consumer lending to low-income geographies was significantly lower than the percentage of households in low-income geographies. In 2019-2020 and 2021, Think's consumer lending to moderate-income geographies was lower than the percentage of households in moderate-income geographies. There is no aggregate lending data available for consumer loans.

The bank's performance is partially explained with performance context. The bank's 2019-2020 Minneapolis AA was very large in relation to the bank's footprint and competition in the AA was significant. While the bank's St. Paul branch was near several LMI geographies, it was temporarily closed in March 2020 due to the pandemic and remained shut down until it was permanently closed in July 2021. The bank's AA was much smaller for 2021 and remaining branches were not near low-income geographies. Branches were near moderate-income geographies throughout the evaluation period.

Lending Gap Analysis

We reviewed the 2019-2021 HMDA and CRA data to identify gaps, particularly in LMI geographies, where no lending occurred during the evaluation period.

<u>Rochester AA</u>
There were no gaps identified in the Rochester AA during the evaluation period.

<u>Minneapolis AA</u>
There were no unexplained conspicuous lending gaps identified in the Minneapolis AA during the evaluation period. There were ten LMI geographies where no lending occurred from 2019-2021 and those geographies were part of the AA during the entire evaluation period. Additionally, there were 15 LMI geographies where no lending occurred from 2019-2020 and that geography was part of the AA for only the 2019-2020 period and removed in 2021. The gaps do not represent a concern. In most instances, the geographies with no lending were not near any of the bank's branches and several other banks offered more convenient locations. There were also instances where the LMI geographies with gaps contained airports, cemeteries, parks, and schools, which typically do not need loans or do not have traditional credit needs that can be met by community banks and therefore reduced lending opportunities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

Rochester AA
The distribution of home mortgages to borrowers of different income levels within the Rochester AA is good. In 2019-2020 and 2021, the bank's home mortgage lending performance to low-income borrowers was significantly lower than the percentage of low-income families in the AA and somewhat lower than aggregate lending to low-income borrowers. In 2019-2020 and 2021, the bank's home mortgage lending performance to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was near aggregate lending to moderate-income borrowers.

Aggregate lending data indicates that the demographic comparator may not be a realistic comparator for gauging the bank's lending performance to low-income borrowers. Aggregate data showed lenders collectively originated a significantly smaller portion of their home mortgages to low-income borrowers than the percentage of low-income families in the AA. Poverty level and housing costs were notable barriers to home ownership for low-income families. The median housing value in the Rochester AA during the evaluation period was approximately $180,000 and 5.3 percent of families were living in poverty. Those living in poverty were less likely to qualify for a home mortgage, particularly given the cost to purchase a home. Those living in poverty are included in the low-income demographic. This performance context reasonably explains why aggregate lending and the bank's lending is lower than the demographic.

Minneapolis AA
The distribution of home mortgages to borrowers of different income levels within the Minneapolis AA is adequate. In 2019-2020 and 2021, the bank's home mortgage lending performance to low-income borrowers was significantly lower than the percentage of low-income families in the AA and lower than aggregate lending to low-income borrowers. In 2019-2020, the bank's home mortgage lending performance to moderate-income borrowers was somewhat lower than the percentage of moderate-income families in the AA and lower than aggregate lending to moderate-income borrowers. In 2021, the bank's home mortgage lending performance to moderate-income borrowers was near the percentage of moderate-income families in the AA and somewhat lower than aggregate lending to moderate-income borrowers. In isolation, the bank's home mortgage lending to low-income borrowers for the evaluation period is very poor and lending to moderate-income borrowers is adequate before considering performance context.

The bank's performance lending to low-income borrowers is partially explained. Aggregate lending data reflected lenders collectively originated a small percentage of home mortgages to low-income borrowers (6-8 percent) and their performance was well below the AA demographic (20 percent of families were low-income). Think's home mortgage lending to low-income borrowers was lower than aggregate performance. Poverty level and housing costs were notable barriers to home ownership for low-income families. The median housing value in the Minneapolis AA during the evaluation period was

approximately $240,000 and 7.3 percent of families were living in poverty. Those living in poverty were less likely to qualify for a home mortgage, particularly given the cost to purchase a home.

Small Loans to Businesses

Refer to Table R 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.

<u>Rochester AA</u>
The distribution of small loans to businesses of different sizes in the Rochester AA is excellent. In 2019-2020, the bank's lending to small businesses was near to the percentage of small businesses in the AA and significantly exceeded aggregate lending to small businesses. In 2021, the bank's lending to small businesses exceeded the percentage of small businesses in the AA and significantly exceeded aggregate lending to small businesses.

<u>Minneapolis AA</u>
The distribution of small loans to businesses of different sizes in the Minneapolis AA is excellent. In 2019-2020, the bank's lending to small businesses was near the percentage of small businesses in the AA and significantly exceeded aggregate lending to small businesses. In 2021, the bank's lending to small businesses exceeded the percentage of small businesses in the AA and significantly exceeded aggregate lending to small businesses.

Consumer Loans

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

<u>Rochester AA</u>
The distribution of loans to consumers of different income levels in the Rochester AA is excellent. In 2019-2020 and 2021, Think's consumer lending to low-income borrowers exceeded the percentage of low-income households in the AA. In 2019-2020 and 2021, Think's consumer lending to moderate-income borrowers significantly exceeded the percentage of moderate-income households in the AA. There is no aggregate lending data for comparison.

<u>Minneapolis AA</u>
The distribution of loans to consumers of different income levels in the Minneapolis AA is good. In 2019-2020, Think's consumer lending to low-income borrowers was lower than the percentage of low-income households in the AA. In 2021, the bank's consumer lending to low-income borrowers was somewhat lower than the demographic comparator. In 2019-2020, Think's consumer lending to moderate-income borrowers exceeded the percentage of moderate-income households in the AA. In 2021, the bank's consumer lending to moderate-income borrowers was near the demographic comparator. There is no aggregate lending data for comparison.

Low-income borrowers, particularly those living in poverty, were less likely to qualify for a loan, which reduced lending opportunities and helped explain the bank's lower performance originating loans to low-income borrowers. Demographic data indicated the level of households within the AA living in poverty was 10.3 percent in 2020 and 10.5 percent in 2021. Households in poverty are included within the low-income demographic comparator.

Community Development Lending

The institution made a low level of CD loans.

The Lending Activity Tables, shown above on page 9, set forth 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.

<u>Rochester AA</u>
Think made a low level of CD loans in the Rochester AA. During the evaluation period, the bank made two CD loans totaling $2.3 million that benefited the Rochester AA. The CD loans represented 0.8 percent of allocated capital. Allocated capital is Tier 1 capital as of December 31, 2021 multiplied by the percentage of the bank's deposits in the AA according to the FDIC Deposit Market Share Report as of June 30, 2021. The bank's qualified CD loans in the Rochester AA were both Paycheck Protection Program (PPP) loans that supported revitalization efforts in response to the pandemic by maintaining jobs and essential services for LMI individuals.

Community contacts indicated a need and opportunities for CD lending. While there was competition for CD loans given the number of financial institutions in the AA, Think had a large presence in the market during the evaluation period and the financial capacity to increase CD lending. It is important to note that since Think is evaluated under the Large Bank CRA examination type, only loans not reported in CRA or HMDA data, except for multifamily loans, can be presented for CD loan consideration.

<u>Minneapolis AA</u>
Think made an adequate level of CD loans in the Minneapolis AA. During the evaluation period, Think made one CD loan for $5.4 million, which represented 11.6 percent of allocated capital. The loan size in relation to the bank's allocated capital is excellent. However, it was only one loan. Community contacts indicated there were opportunities and a need for CD lending within the AA. The bank's CD loan in the AA supported economic development by financing a small business' purchase and construction of a new property to be used by a related construction company for its main operations. The construction company's new location created and retained jobs for LMI individuals. Small business financing was an identified need in the AA and the bank's loan demonstrated adequate responsiveness.

Product Innovation and Flexibility

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs.

During the evaluation period, Think offered several flexible loan products that promoted affordable homeownership for LMI individuals in both AAs. Think continued to offer the American Dream Mortgage, an internally developed home mortgage product designed for LMI first-time homebuyers. Think also offered Fannie Mae HomeReady loans and loans with Federal Home Loan Bank down payment assistance.

Think originated and offered loan products that promoted flexible small business lending. Think offered Small Business Administration (SBA) loan programs. In example, the bank originated loans under the SBA's Paycheck Protection Program (PPP) during the pandemic, which helped stabilize small businesses and retain jobs. During the evaluation period, Think made 1,403 PPP loans totaling $52.7 million.

The bank had no innovative lending products during the evaluation period.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Rochester AA is adequate. Based on a full-scope review, the bank's performance in the Minneapolis AA is excellent.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Minneapolis	2	1,527	28	5,376	30	33.3	6,902	79.3	0	0
Rochester	1	651	59	1,154	60	66.7	1,805	20.7	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Rochester AA
Think made an adequate level of qualified investments and donations in the Rochester AA. Think's qualified investments and donations in the AA totaled $1.8 million and represented 0.7 percent of allocated capital. Think's investments and donations exhibited adequate responsiveness to identified affordable housing needs in the AA.

Think maintained one prior period investment benefiting the Rochester AA. The investment was a low-income housing tax credit (LIHTC) project to rehabilitate an affordable apartment building in Rochester. The outstanding balance of this investment was $651 thousand as of December 31, 2021. This investment represents 0.2 percent of allocated capital.

During the evaluation period, Think made no new qualified investments exclusive to the Rochester AA. The bank purchased a $5.0 million investment in a Minnesota Housing Finance Agency (MFHA) bond to support affordable housing throughout the state of Minnesota. This investment has potential to benefit the Rochester AA, as well as the Minneapolis AA, and other parts of the state. The MHFA bond purchase represents about 1.6 percent of Tier 1 capital. This broader state investment is considered at the State of MN level since it impacts both AAs and the broader state area.

During the evaluation period, Think made 59 donations totaling $1.2 million to different qualified organizations. The donations represented 0.4 percent of allocated capital. Donations primarily supported organizations providing community services to LMI individuals and a few donations were given to organizations providing affordable housing. For example, Think donated $245 thousand to the Boys and

Girls Club of Rochester to support the organization's purpose of providing educational and health services to children from predominately LMI families. In another example, Think contributed $150 thousand to First Homes, a subsidiary of Rochester Area Foundation, to support financial assistance programs to make home ownership affordable for LMI individuals and families.

Minneapolis AA

Think made an excellent level of qualified investments and donations in the Minneapolis AA. Think's qualified investments and donations in the AA totaled $6.9 million and represented 14.8 percent of allocated capital. Affordable housing was an identified need within the AA and Think's investments and donations exhibited good responsiveness.

Think maintained two prior period investments benefiting the Minneapolis AA. The investments were LIHTC projects to build new affordable apartment buildings in Hennepin County. The outstanding balance of those investments totaled $1.5 million, which represented 3.3 percent of allocated capital. Additionally, Think made three new qualified investments that benefited the AA during the evaluation period. The new investments totaled $5.2 million and represented 11.1 percent of allocated capital. Investments included $2.3 million in St. Paul Independent School District bonds, which helped maintain and renovate school facilities for a district that primarily serves LMI students. The new investments also targeted affordable housing with a $2.9 million mortgage-backed security containing 12 home mortgages to LMI borrowers within the AA. As noted above, there was also a broader state investment of $5.0 million in MFHA that could potentially benefit the Minneapolis AA and is considered at the State of MN level.

During the evaluation period, Think also made 25 donations totaling $183 thousand to different qualified organizations. The donations represented 0.4 percent of allocated capital. Donations primarily supported organizations providing community services to LMI individuals and two donations were given to organizations providing affordable housing. For example, Think contributed $75 thousand to Lutheran Social Services of Minnesota to support the Rezek House, which provides transitional housing for homeless young adults in St. Paul, and the Center of Changing Lives, which provides affordable housing and community services in Minneapolis. In another example, Think donated $30 thousand to 360 Communities, which provides food shelves, domestic violence shelters, and resource centers in Dakota County.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Rochester AA is good. Based on a full-scope review, the bank's performance in the Minneapolis AA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.

Given branch closures in 2021, we analyzed the branch distribution in 2019-2020 separately from 2021. The 2021 distribution shown below is reflective of the St. Paul (Minneapolis AA) and Rochester IBM (Rochester AA) branch closures.

Distribution of Branch Delivery System											
	Deposits	Branches						Population			
Assessment Area	% 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	Upper	Low	Mod	Mid	Upper
Minneapolis 2019-2020	15.9	4	40.0	0.0	25.0	75.0	0.0	7.3	18.9	40.0	33.4
Minneapolis 2021	14.8	3	37.5	0.0	0.0	100.0	0.0	7.3	19.3	39.6	33.5
Rochester 2019-2020	84.1	6	60.0	0.0	17.0	50.0	33.0	0.0	18.4	51.0	30.6
Rochester 2021	85.2	5	62.5	0.0	0.0	60.0	40.0	0.0	18.4	51.0	30.6
Source: 2015 ACS; 01/01/2019-12/31/2021 Bank Data; FDIC Deposit Market Share Reports as of June 30, 2020 and June 30, 2021.											

Rochester AA
Branch locations are accessible to geographies and individuals of different income levels. There were no low-income geographies in the AA during the evaluation period. In 2019-2020, there were six branches in the AA. Of those branches, one branch was in a moderate-income geography and the other five branches were in a middle-income geography. The percentage of bank branches in a moderate-income geography is near the population percentage in a moderate-income geography. In 2021, following the permanent closure of the Rochester IBM branch, there were no branches in a moderate-income geography. The remaining five branches were in a middle-income geography. Throughout the evaluation period of 2019-2021, four branches were nearby moderate-income geographies, including the downtown Rochester branch that was within a few blocks of three moderate-income geographies. There were no deposit-taking ATMs in the AA during the evaluation period.

Minneapolis AA
Branch locations are reasonably accessible to geographies and individuals of different income levels. In 2019-2020, there were four branches in the AA. Of those branches, one branch was in a moderate-income geography and the other three were in a middle-income geography. There were no branches in a low-income geography, which was significantly below the population percentage in low-income geographies. However, the St. Paul branch was nearby several low-income geographies. The bank's branch distribution in moderate-income geographies exceeded the population percentage in moderate-income geographies. In 2021, following the permanent closure of the St. Paul branch, there were no branches in a LMI geography, which compared poorly to the population percentages in LMI geographies. The remaining three branches were in middle-income geographies. The branches were approximately one to three miles from the nearest moderate-income geography, making them reasonably accessible. There were no deposit-taking ATMs in the AA during the evaluation period.

Alternative systems for delivering retail banking services expand access to LMI geographies and individuals. Alternative delivery systems were available consistently in both AAs and included the ability to make deposits by mail, free automated phone banking, free online banking, online bill pay, and free mobile deposits. Think customers had access to eight surcharge-free ATM transactions per month

within the MoneyPass and PULSE ATM networks, in addition to free ATM transactions at all Think-owned ATMs. To ensure banking services to consumers and small businesses are easily accessible, the Bank streamlined requirements to be eligible. For example, Think did not require ChexSystems inquiries to assess eligibility for account ownership. This allowed account ownership for more customers who would not qualify if this standard was in place.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Moderate	Middle	Upper
Minneapolis	0	1	0	-1	0	0
Rochester	0	1	0	-1	0	0

To the extent changes have been made, 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.

Rochester AA
The branch closure in the Rochester AA has not adversely affected the accessibility of delivery systems. Think closed its branch in the IBM campus in Rochester in July 2021. The branch was located within a moderate-income geography. While it was the bank's only location within a moderate-income geography, the closure did not have a material effect. Access to the branch was restricted to IBM employees due to IBM's security requirements and the public could not use the branch. The branch was temporarily closed in March 2020 at the onset of the pandemic and did not reopen prior to the permanent closure in July 2021. During the pandemic, customers adapted to using alternative services and a physical branch became less critical. There were no complaints received by Think or the OCC in response to the branch closure. Think continued to operate other branches nearby that could reasonably serve the area.

Minneapolis AA
The branch closure in the Minneapolis AA has generally not adversely affected the accessibility of delivery systems. Think closed its St. Paul branch in July 2021. The branch was located within a moderate-income geography. It was Think's only branch within the AA that was located in a LMI geography. The branch was temporarily closed in March 2020 at the onset of the pandemic and did not reopen prior to the permanent closure in July 2021. The branch was in the skyway in downtown St. Paul. During the pandemic, customers adapted to using alternative services and a physical branch became less important. The pandemic made remote work more common and reduced the foot traffic in downtown St. Paul, which further support the bank's reason for closure. There were no complaints received by Think or the OCC in response to the branch closure.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.

Rochester AA
Branch services and hours in the Rochester AA do not vary in a way that inconveniences customers. All branches offered a full range of traditional deposit and loan products, as well as insurance and financial planning. The bank's deposit products included free basic personal and business checking accounts, a variety of loan products, including mortgages for first-time homebuyers, home equity, automobile, secured, and unsecured consumer loans. Weekday lobby hours were similar between all branches in the

AA during the evaluation period. Four of the six branches offered comparable drive-up service hours and Saturday lobby hours. The downtown Rochester branch and former IBM branch did not have drive-up service or Saturday lobby hours, which was explainable. The locations of the branches did not have space to accommodate drive-up facilities and the areas were predominantly weekday use with diminished traffic on the weekends. Branch lobbies were temporarily closed during part of 2020 and 2021 in response to the pandemic, which was reasonable. All branches and the corporate office offered cash-dispensing ATMs. Think also operated six additional 24-hour ATMs located around the greater Rochester area.

Minneapolis AA
Branch services and hours in the Minneapolis AA do not vary in a way that inconveniences customers. All branches offered a full range of traditional deposit and loan products, as well as insurance and financial planning. The bank's deposit products included free basic personal and business checking accounts, a variety of loan products, including mortgages for first-time homebuyers, home equity, automobile, secured, and unsecured consumer loans. Weekday lobby hours were similar between all branches in the AA. Three of the four branches offered comparable drive-up service hours and Saturday lobby hours. The St. Paul branch, located in a moderate-income CT, did not offer drive-up service or Saturday hours. Differences with the St. Paul branch were reasonable since there was low demand on weekends and physical space restricted a drive-up. Branch lobbies were temporarily closed during part of 2020 and 2021 in response to the pandemic, which was reasonable. The Edina and Eagan branches offered community rooms that could be used by nonprofit organizations at no cost. All branches offered cash-dispensing ATMs.

Community Development Services

The institution provides a relatively high level of CD services.

Rochester AA
Bank employees provided a relatively high level of CD services in the Rochester AA. During the evaluation period, 13 employees provided 2,277 hours of service to 11 qualified organizations. Most CD services were provided to organizations serving LMI individuals. Two employees served organizations providing affordable housing, which was an identified need in the AA. All service hours were in a leadership role. Employees provided their technical expertise by serving on board or board committee of the organization. CD service examples are outlined below.
- One employee served as a board member for an organization building affordable homes for LMI families in the Rochester area.
- Two employees served as board members for an organization providing youth development programming for LMI children in Rochester.

Minneapolis AA
Bank employees provided an adequate level of CD services in the Minneapolis AA. During the evaluation period, three employees provided 396 hours of service to two qualified organizations. The qualified organizations provide community services primarily to LMI individuals. All service hours were in a leadership role. Employees provided their technical expertise by serving on board or board committee of the organization. CD service examples are outlined below.
- Two employees served as committee members for an organization breaking domestic violence and poverty cycles by providing domestic violence shelters, food shelves, and community resources in Dakota County.

- One employee served as a board member of an organization providing college scholarships to LMI individuals and community grants to organizations that serve LMI individuals around Eagan.

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:	01/01/2019-12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, consumer loans Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Minnesota		
Rochester AA	Full scope	2019-2021: Entire counties of Dodge and Olmsted and partial counties of Fillmore, Wabasha, Goodhue, and Mower. Census tract numbers for partial counties: Fillmore: 9602, 9603 Wabasha: 4903, 4904, 4905, 4906 Goodhue: 807, 808, 809 Mower: 12, 14
Minneapolis AA	Full scope	2019-2020: Entire counties of Dakota, Hennepin, Scott, Carver, Washington, and Ramsey 2021: Entire counties of Dakota and Hennepin

Appendix B: Summary of MMSA and State Ratings

RATINGS – THINK MUTUAL BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
Think Mutual Bank	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Minnesota	High Satisfactory	High Satisfactory	High Satisfactory	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 §1003.2 of this title, and that is not an excluded transaction under §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 investments, and branch distribution).

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

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

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

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

MMSA (state): 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.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year.

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

Table O. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

Table S.   **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T.   **Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to $500 thousand) originated and purchased by the bank to farms with revenues of $1 million or less to: 1) the percentage distribution of farms with revenues of greater than $1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table U.   **Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table V.   **Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2019-20	
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Minneapolis MSA	1,041	249,752	27.6	197,552	2.7	1.1	2.5	14.5	8.8	12.3	43.1	39.0	41.4	39.6	51.0	43.7	0.1	0.1	0.1
Rochester MSA	2,735	636,319	72.4	13,732	0.0	0.0	0.0	14.5	9.2	13.0	52.5	39.0	48.2	33.0	51.8	38.9	0.0	0.0	0.0
Total	3,776	886,071	100.0	211,284	2.5	0.3	2.3	14.5	9.1	12.4	43.9	39.0	41.9	39.0	51.6	43.4	0.1	0.0	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021	
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Minneapolis MSA	324	68,455	21.7	113,043	2.4	0.9	2.7	15.0	10.8	14.0	42.4	44.1	41.4	40.1	44.1	41.8	0.1	0.0	0.1
Rochester MSA	1,172	278,631	78.3	12,327	0.0	0.0	0.0	14.5	12.8	14.6	52.5	42.6	49.6	33.0	44.6	35.8	0.0	0.0	0.0
Total	1,496	347,086	100.0	125,370	2.1	0.2	2.4	14.9	12.4	14.1	43.7	42.9	42.2	39.2	44.5	41.2	0.1	0.0	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower   **2019-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Minneapolis MSA	1,041	249,752	27.6	197,552	20.6	2.1	6.2	16.7	11.8	18.9	21.3	23.7	22.1	41.5	60.6	37.8	0.0	1.7	15.0
Rochester MSA	2,735	636,319	72.4	13,732	17.7	7.0	9.2	17.7	19.6	22.5	23.8	21.2	21.3	40.7	51.4	33.6	0.0	0.8	13.4
Total	**3,776**	**886,071**	**100.0**	**211,284**	**20.4**	**5.6**	**6.4**	**16.7**	**17.5**	**19.1**	**21.5**	**21.9**	**22.0**	**41.4**	**54.0**	**37.5**	**0.0**	**1.0**	**14.9**

Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower   **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Minneapolis MSA	324	68,455	21.7	113,043	20.4	5.2	8.0	16.5	15.1	19.6	21.0	25.9	20.9	42.1	53.4	35.0	0.0	0.3	16.5
Rochester MSA	1,172	278,631	78.3	12,327	17.7	8.6	11.3	17.7	22.6	24.0	23.8	21.5	21.1	40.7	46.7	31.0	0.0	0.6	12.6
Total	**1,496**	**347,086**	**100.0**	**125,370**	**20.1**	**7.9**	**8.3**	**16.6**	**21.0**	**20.0**	**21.3**	**22.5**	**20.9**	**42.0**	**48.1**	**34.6**	**0.0**	**0.5**	**16.1**

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																						2019-20
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Minneapolis MSA	419	26,964	41.2	61,509	5.8	2.4	5.5	16.7	10.7	15.9	40.8	44.6	40.5	36.3	42.2	37.9	0.3	0.0	0.2			
Rochester MSA	597	32,992	58.8	3,249	0.0	0.0	0.0	17.9	15.7	17.9	51.8	43.6	49.2	30.3	40.7	32.9	0.0	0.0	0.0			
Total	1,016	59,956	100.0	64,758	5.5	1.0	5.3	16.8	13.7	16.0	41.5	44.0	40.9	36.0	41.3	37.6	0.3	0.0	0.2			

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																						2021
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Minneapolis MSA	298	9,366	39.0	48,989	5.8	6.4	6.0	16.3	12.4	16.2	40.9	43.6	40.2	36.6	37.6	37.3	0.5	0.0	0.3			
Rochester MSA	467	18,202	61.0	3,992	0.0	0.0	0.0	17.8	15.6	18.9	51.6	45.0	48.9	30.6	39.4	32.2	0.0	0.0	0.0			
Total	765	27,568	100.0	52,981	5.3	2.5	5.6	16.4	14.4	16.4	41.8	44.4	40.8	36.1	38.7	36.9	0.4	0.0	0.3			

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues   **2019-20**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	419	26,964	41.2	61,509	87.6	81.6	45.3	5.0	18.4	7.4	0.0
Rochester MSA	597	32,992	58.8	3,249	85.9	81.2	49.1	4.4	18.8	9.7	0.0
Total	**1,016**	**59,956**	**100.0**	**64,758**	**87.5**	**81.4**	**45.5**	**5.0**	**18.6**	**7.6**	**0.0**

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues   **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	298	9,366	39.0	48,989	87.6	91.6	49.5	4.7	8.4	7.6	0.0
Rochester MSA	467	18,202	61.0	3,992	86.2	93.1	56.4	4.0	6.9	9.9	0.0
Total	**765**	**27,568**	**100.0**	**52,981**	**87.5**	**92.5**	**50.0**	**4.7**	**7.5**	**7.8**	**0.0**

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																					**2019-20**
	Total Loans to Farms				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**					
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**			
Minneapolis MSA	0	0	0.0	382	2.5	0.0	1.0	11.9	0.0	3.1	45.6	0.0	56.5	39.9	0.0	39.3	0.1	0.0	0.0			
Rochester MSA	0	0	0.0	630	0.0	0.0	0.0	3.7	0.0	0.5	72.0	0.0	85.2	24.3	0.0	14.3	0.0	0.0	0.0			
Total	**0**	**0**	**0.0**	**1,012**	**2.0**	**0.0**	**0.4**	**10.2**	**0.0**	**1.5**	**50.9**	**0.0**	**74.4**	**36.8**	**0.0**	**23.7**	**0.1**	**0.0**	**0.0**			

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																					**2021**
	Total Loans to Farms				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**					
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**			
Minneapolis MSA	0	0	0.0	258	2.6	0.0	1.9	14.2	0.0	4.3	44.3	0.0	60.9	38.8	0.0	32.9	0.1	0.0	0.0			
Rochester MSA	0	0	0.0	746	0.0	0.0	0.0	4.2	0.0	0.4	71.7	0.0	86.6	24.1	0.0	13.0	0.0	0.0	0.0			
Total	**0**	**0**	**0.0**	**1,004**	**1.8**	**0.0**	**0.5**	**11.2**	**0.0**	**1.4**	**52.5**	**0.0**	**80.0**	**34.4**	**0.0**	**18.1**	**0.1**	**0.0**	**0.0**			

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-20

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis MSA	0.0	0.0	0.0	382	95.6	0.0	51.0	2.5	0.0	1.9	0.0
Rochester MSA	0.0	0.0	0.0	630	97.8	0.0	57.3	1.2	0.0	1.0	0.0
Total	**0.0**	**0.0**	**0.0**	**1,012**	**96.1**	**0.0**	**54.9**	**2.2**	**0.0**	**1.7**	**0.0**

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2021

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis MSA	0.0	0.0	0.0	258	95.8	0.0	55.8	2.2	0.0	2.0	0.0
Rochester MSA	0.0	0.0	0.0	746	97.9	0.0	61.9	1.2	0.0	0.9	0.0
Total	**0.0**	**0.0**	**0.0**	**1,004**	**96.4**	**0.0**	**60.4**	**1.9**	**0.0**	**1.7**	**0.0**

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2019-20
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Minneapolis MSA	2,422	44,539	28.1	6.5	2.4	19.3	10.6	41.6	44.5	32.1	42.5	0.4	0.1	
Rochester MSA	6,205	94,166	71.9	0.0	0.0	19.4	16.2	51.4	50.4	29.1	33.4	0.0	0.0	
Total	8,627	138,705	100.0	6.0	0.7	19.3	14.6	42.4	48.8	31.9	35.9	0.3	0.0	

Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2021
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Minneapolis MSA	758	16,905	22.5	6.6	1.1	19.6	11.3	41.3	45.9	32.0	41.6	0.6	0.1	
Rochester MSA	2,617	49,419	77.5	0.0	0.0	19.4	16.4	51.4	49.2	29.1	34.5	0.0	0.0	
Total	3,375	66,324	100.0	5.8	0.2	19.6	15.2	42.4	48.4	31.6	36.1	0.5	0.0	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-20
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Minneapolis MSA	2,422	44,539	28.1	24.4	12.2	16.0	17.9	17.9	18.3	41.8	27.3	0.0	24.2
Rochester MSA	6,205	94,166	71.9	21.8	23.8	15.8	20.0	19.0	14.5	43.4	15.7	0.0	26.0
Total	8,627	138,705	100.0	24.2	20.5	16.0	19.4	18.0	15.6	41.9	19.0	0.0	25.5

Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Minneapolis MSA	758	16,905	22.5	24.4	18.9	16.0	15.6	17.8	16.2	41.7	24.8	0.0	24.5
Rochester MSA	2,617	49,419	77.5	21.8	24.1	15.8	21.2	19.0	15.2	43.4	16.1	0.0	23.4
Total	3,375	66,324	100.0	24.1	22.9	16.0	19.9	18.0	15.5	41.9	18.0	0.0	23.6

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%