



PUBLIC DISCLOSURE

April 26, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mid-Central National Bank
Charter 25227

520 Jefferson St. S.
Wadena, MN 56482

Office of the Comptroller of the Currency

222 S. 9th St., 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.

Table of Contents

Overall CRA Rating..... 1
Description of Institution..... 2
Scope of the Evaluation..... 2
Discriminatory or Other Illegal Credit Practices Review..... 4
State Rating..... 5
 State of Minnesota..... 5
Appendix A: Scope of Examination..... A-1
Appendix B: Summary of MMSA and State Ratings..... B-1
Appendix C: Definitions and Common Abbreviations..... C-1
Appendix D: Tables of Performance Data..... D-1

Overall CRA Rating

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

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The distribution of loans throughout different income level geographies is excellent.
- The distribution of loans among borrowers of different income levels is excellent.
- The bank originated a majority of its loans inside its assessment area (AA).
- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- There were no CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable. Mid-Central National Bank's (Mid-Central) quarterly LTD ratio averaged 100.88 percent over 21 quarters since the prior CRA evaluation, covering December 31, 2015 through December 31, 2020. Mid-Central's LTD ratio ranks first in comparison to similarly situated institutions. Similarly situated institutions operate in Mid-Central's AA with total assets ranging from \$76 to \$260 million.

| Institution | Total Assets as of 12/31/2020 (000's) | Average LTD Ratio (%) |
|--|---|--------------------------|
| Mid-Central National Bank | 141,301 | 100.88 |
| The First National Bank of Henning | 260,181 | 77.21 |
| Wadena State Bank | 212,186 | 68.10 |
| Community First Bank | 114,154 | 63.99 |
| Farmers & Merchants State Bank of New York Mills | 76,201 | 56.82 |

Source: Call Report data from 12/31/2015 to 12/31/2020.

Lending in Assessment Area

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

We analyzed 20 home mortgage loans and 20 consumer loans originated between January 1, 2018 and December 31, 2020. The bank originated 77.5 percent by number and 59.2 percent by dollar volume of its total loans inside its AA during the evaluation period. This analysis is performed at the bank level, rather than the AA level. Refer to the table on the following page for details on lending inside and outside the bank's AA.

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|-----------------|-------------|----------|-------------|------------|---------------------------------|-------------|--------------|-------------|-------------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 14 | 70.0 | 6 | 30.0 | 20 | 1,888 | 58.2 | 1,357 | 41.8 | 3,244 |
| Consumer | 17 | 85.0 | 3 | 15.0 | 20 | 158 | 75.0 | 53 | 25.0 | 211 |
| Total | 31 | 77.5 | 9 | 22.5 | 40 | 2,046 | 59.2 | 1,409 | 40.8 | 3,455 |

Source: Loan sample using 01/01/2018 - 12/31/2020 bank data.

Description of Institution

Mid-Central is a \$141 million national bank headquartered in Wadena, MN. Mid-Central is wholly owned by Jiko Group, Inc (JGI). Mid-Central has three full-service locations in Minnesota, including the main office in Wadena and two branches in Staples and Long Prairie. There were no branch openings or closings during the evaluation period.

During the evaluation period, the bank's ownership, name, charter type, and affiliates changed due to a holding company acquisition. JGI purchased 100 percent of the bank from Mid-Central Financial Corporation on September 3, 2020. As part of the holding company acquisition, Mid-Central converted from a stock thrift to a national bank and changed its name from Mid-Central Federal Savings Bank to Mid-Central National Bank. The charter number also changed from 706149 to 25227. The bank gained two new affiliates, Jiko Technologies Inc. (JTI) and Jiko Securities Inc. (JSI).

Mid-Central offers a variety of traditional commercial and retail banking products and services at each of its locations. Product and service offerings did not change as a result of the holding company acquisition. The bank also offers a unique demand deposit account associated with the Jiko Product offered by affiliate JSI. The deposit account is structured as a zero-balance account with all funds swept into a brokerage account maintained by JSI. A customer can use the deposit account for ACH and debit card transactions, which are funded from sale proceeds of U.S. Treasury securities held in the related JSI brokerage account and transferred back to the deposit account. The bank operates three automated teller machines (ATMs), one at each location. None of the ATMs accept deposits.

As of December 31, 2020, the bank's total loan portfolio was \$88.7 million based on outstanding balance and \$93.1 million based on total commitment. By dollar, the total committed loan portfolio consists of 65 percent home mortgage loans, 18 percent consumer loans, 12 percent business loans, and 5 percent farm loans. Total loans outstanding represent 63 percent of total assets. As of December 31, 2020, tier one capital totaled \$16.4 million and the tier one leverage capital ratio was 12.05 percent.

Mid-Central received an "Outstanding" rating at the prior CRA evaluation dated January 18, 2016. There are no legal or financial factors impeding the bank's ability to meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Mid-Central's CRA performance using small bank performance standards consisting of the Lending Test, which evaluates the bank's record of meeting the credit needs of its AA. The

evaluation period for the borrower and geographic distribution portions of the Lending Test covered January 1, 2018 through December 31, 2020. The complaint review covered January 17, 2016 through April 26, 2021, which aligns with the timeframe since the prior CRA evaluation.

To determine the bank's lending performance, we selected primary products based on the number and dollar volume of loan originations during the evaluation period. Home mortgage loans and consumer loans are the primary products for this evaluation as they represent the largest volume of originations by dollar and number, respectively. The table below shows loan origination and purchase volume.

| Origination Volume | | | | |
|---------------------------|------------------------------------|--------------|-----------------|--------------|
| Loan Type | Dollar Amount of Loans \$(000s) | | Number of Loans | |
| | \$ | % of Total | # | % of Total |
| Home Mortgage | 71,546 | 60.4 | 605 | 16.9 |
| Consumer | 35,144 | 29.7 | 2,717 | 76.0 |
| Farm | 5,378 | 4.5 | 80 | 2.2 |
| Business | 6,304 | 5.3 | 171 | 4.8 |
| Total | 118,373 | 100.0 | 3,573 | 100.0 |

Source: 01/01/2018 - 12/31/2020 Bank Data.

We selected initial samples of 20 home mortgage loans and 20 consumer loans to complete the Lending Test analysis. Additional loans were selected as needed to have sufficient information to perform meaningful analysis of borrower and geographic lending distributions within the AA.

We also reviewed the financial, economic, and environmental factors in the AA to provide context for the bank's lending performance. In addition, we contacted community members with knowledge of the economic conditions and demographics to gain insight on the credit needs of the AA.

Activities from affiliates JTI and JSI are not considered in the scope of this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state are selected for a full-scope review. For purposes of this evaluation, the bank has only one AA, the MN Non-MSA consisting of Todd and Wadena Counties and the eastern portion of Otter Tail County. This AA was selected for a full-scope review and evaluated under the State of Minnesota rating area.

Refer to the "Scope" section under the State Rating and Appendix A, Scope of Examination, for more details on the AA.

Ratings

Mid-Central's overall rating is based on the bank's lending performance within the State of Minnesota. It is the bank's only rating area. We evaluated lending performance using the following performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different income levels, lending to different income level geographies, and responses to CRA-related complaints. In developing our conclusions, we placed an equal weight on home mortgage and consumer lending for the Lending Test given they had similar origination volumes.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans throughout different income level geographies is excellent.
- The distribution of loans among borrowers of different income levels is excellent.
- There were no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

Mid-Central has one AA that is considered for the Minnesota rating area. The bank's only AA, referred to as the MN Non-MSA AA, includes Todd County, Wadena County, and the eastern portion of Otter Tail County. The AA consists of three moderate-income census tracts (CT) and 13 middle-income CTs. There are no low- or upper-income CTs in the AA. Two middle-income CTs in Wadena County were designated as distressed in 2020 due to the unemployment level. The AA meets the regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) geographies.

The bank has three full-service locations, all of which are located in Minnesota. The main office in Wadena is located in Wadena County within a moderate-income geography. The Long Prairie branch is located in Todd County within a middle-income geography. The Staples branch is located in Todd County within a moderate-income geography. There were no branches opened or closed during the evaluation period.

According to the June 30, 2020 FDIC Deposit Market Share Report, competition is high with 25 institutions operating in the AA. Competitors include national and state community banks, as well as branches of large national banks. The bank ranked eighth out of 25 reporting institutions with \$112 million in total deposits and a 4.88 percent deposit market share.

We contacted two community organizations and reviewed several recently completed contact reports for the area. The contacts included Wadena Housing and Redevelopment Authority, Central Minnesota Housing Partnership, Osakis Area Chamber of Commerce, Region Five Development Commission, and the Otter Tail County Community Development Agency. The contacts identified Todd, Wadena, and Otter Tail Counties as lower-income with primarily rural communities. Contacts noted that the housing inventory in these communities is very low. Combined with rising home prices, individuals need to act quickly and have down payments ready when new listings are posted. These market conditions have largely removed low- and moderate-income individuals from the home purchase market. Contacts also indicated that several affordable homes in the area need renovations or repairs. Contacts stated there are affordable housing projects within the area. However, nearly all are rental units rather than homes for purchase.

The following table shows demographic and economic information for the MN Non-MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: MN Non-MSA - 2019 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 16 | 0.0 | 18.8 | 81.3 | 0.0 | 0.0 |
| Population by Geography | 57,162 | 0.0 | 19.3 | 80.7 | 0.0 | 0.0 |
| Housing Units by Geography | 31,504 | 0.0 | 18.5 | 81.5 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 18,637 | 0.0 | 18.8 | 81.2 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 4,685 | 0.0 | 27.9 | 72.1 | 0.0 | 0.0 |
| Vacant Units by Geography | 8,182 | 0.0 | 12.5 | 87.5 | 0.0 | 0.0 |
| Businesses by Geography | 4,545 | 0.0 | 22.8 | 77.2 | 0.0 | 0.0 |
| Farms by Geography | 587 | 0.0 | 14.7 | 85.3 | 0.0 | 0.0 |
| Family Distribution by Income Level | 15,271 | 21.8 | 20.0 | 25.3 | 32.9 | 0.0 |
| Household Distribution by Income Level | 23,322 | 27.7 | 16.0 | 19.9 | 36.4 | 0.0 |
| Median Family Income Non-MSAs - MN | | \$63,045 | Median Housing Value | | | \$145,803 |
| | | | Median Gross Rent | | | \$597 |
| | | | Families Below Poverty Level | | | 9.2% |
| <i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Scope of Evaluation in Minnesota

The Minnesota state rating is based solely on results of the MN Non-MSA AA. As indicated previously, this is the bank's only AA and received a full-scope review. Consumer loan and home mortgage loans received equal weight when determining Lending Test conclusions.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Geographic distribution conclusions were based on performance lending in moderate-income geographies only since there are no low-income geographies within the bank's AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the MN Non-MSA AA is excellent. During the evaluation period, Mid-Central significantly exceeded the demographic and aggregate lending data comparators for home mortgage lending to borrowers located in moderate-income geographies within the AA.

Consumer Loans

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

The geographic distribution of consumer loans is excellent. During the evaluation period, Mid-Central significantly exceeded the demographic comparator for consumer lending to borrowers located in moderate-income geographies in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of home mortgage loans to borrowers of different income levels in the MN Non-MSA AA is reasonable. During the evaluation period, Mid-Central's home mortgage lending to low-income borrowers was below the demographic comparator but near the aggregate comparator. Aggregate lending to low-income borrowers was well below the percentage of low-income families in the AA, which indicates there are market factors impacting lenders' ability to originate home mortgage loans to low-income borrowers despite the demographics. The bank's home mortgage lending to moderate-income borrowers was near demographic and aggregate lending data.

Mid-Central's lower performance, particularly for home purchase loans, is attributed to several factors. In the AA, 9.2 percent of families are below poverty level. Families in poverty are less likely to be able to afford a home and qualify for a home mortgage loan. The median home value in the AA is \$145,803. As indicated by community contacts, the competitive home buying market is driving up home prices and has resulted in lack of affordable housing inventory that makes it difficult for LMI borrowers to purchase a home. Additionally, the low-interest rate environment stemming from the COVID-19 pandemic in 2020 resulted in increased home refinance lending for most banks within the market. Refinance activity skewed the bank's lending performance in 2020 towards middle- and upper-income borrowers who could afford to refinance their home mortgage loans. Generally, LMI borrowers are less likely to refinance their homes because of the associated upfront costs.

Consumer Loans

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

The distribution of consumer loans to borrowers of different income levels in the MN Non-MSA AA is excellent. During the evaluation period, Mid-Central significantly exceeded the demographic comparators for consumer lending to LMI borrowers in the AA.

Responses to Complaints

There were no CRA-related complaints during the evaluation period.

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: | 01/01/18 to 12/31/20 | |
| Bank Products Reviewed: | Home mortgage and consumer loans | |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| States | | |
| Minnesota | | |
| MN Non-MSA AA | Full Scope | Todd and Wadena Counties and partial county of Otter Tail (census tracts 9605, 9606, 9613, 9614, 9615). |

Appendix B: Summary of MMSA and State Ratings

| RATINGS Mid-Central National Bank | |
|--------------------------------------|---------------------|
| Overall Bank: | Lending Test Rating |
| Mid-Central National Bank | Outstanding |
| MMSA or State: | |
| Minnesota | Outstanding |

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Table 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.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | 2018-20 | | |
|---|----|------------|-------------------|-----------------------------------|--------------|------------------------|-----------------------------------|--------------|----------------------|-----------------------------------|--------------|---------------------|-----------------------------------|--------------|-----------------------------|-----------------------------------|----------------|-----------|--|
| Total Home Mortgage Loans | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | | |
| | # | \$ (000's) | % of Total | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| MN Non-MSA | 60 | 7,550 | 100.0 | 0.0 | 0.0 | 0.0 | 18.8 | 26.7 | 19.7 | 81.2 | 73.3 | 80.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | |
| <i>Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data; 2019 HMDA Aggregate Data, "--". Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | | | | | | | | | | |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | 2018-20 | | |
|---|----|------------|----------------------|---------------|--------------|---------------------------|---------------|--------------|-------------------------|---------------|--------------|------------------------|---------------|--------------|--------------------------------|---------------|----------------|-----------|--|
| Total Home Mortgage Loans | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | | |
| | # | \$ (000's) | % of Total | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | |
| MN Non-MSA | 60 | 7,550 | 100.0 | 21.8 | 5.0 | 10.0 | 20.0 | 16.7 | 20.9 | 25.3 | 33.3 | 20.2 | 32.9 | 45.0 | 32.0 | 0.0 | 0.0 | 17.0 | |
| <i>Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data; 2019 HMDA Aggregate Data, "--". Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | | | | | | | | | | |

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2018-20 | |
|---|----------------------|------------|------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ (000's) | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| MNNon-MSA | 20 | 195 | 100.0 | 0.0 | 0.0 | 20.6 | 35.0 | 79.4 | 65.0 | 0.0 | 5.0 | 0.0 | 0.0 | |
| <i>Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.</i> <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | | | | |

| Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2018-20 | |
|---|----------------------|------------|------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ (000's) | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| MNNon-MSA | 20 | 195 | 100.0 | 27.7 | 45.0 | 16.0 | 25.0 | 19.9 | 15.0 | 36.4 | 5.0 | 0.0 | 10.0 | |
| <i>Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.</i> <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | | | | |