



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

August 1, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Bemidji
Charter Number 5582

1600 Paul Bunyan Drive NW
Bemidji, MN 56601

Office of the Comptroller of the Currency

222 South Ninth Street, Suite 800
Minneapolis, MN 55402-3393

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The First National Bank of Bemidji (FNBB) demonstrates reasonable dispersion of loans to individuals of different income levels and to businesses of different sizes.
- FNBB demonstrates poor dispersion of business loans throughout geographies of different income levels; however, the bank reflects reasonable dispersion of consumer loans to borrowers of different income levels.
- The loan-to-deposit (LTD) ratio is reasonable, with an adjusted quarterly average of 68.8 percent.
- A substantial majority of loans are originated or purchased inside the assessment area (AA).
- FNBB did not receive any CRA related complaints during the evaluation period.
- FNBB's Community Development (CD) performance reflects excellent responsiveness to AA needs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering FNBB's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. FNBB's average quarterly LTD was 68.8 percent over the 16 quarters since the previous CRA evaluation. The ratio ranged from a low of 43.5 percent on December 31, 2021, to a high of 85.0 percent on June 30, 2018. FNBB ranked third of seven similarly situated institutions. Similarly situated institutions had a similar asset size to FNBB ranging from \$34 million to \$979 million and operate in the same geography.

Loan to Deposit Ratio		
Institution (Headquarters)	Total Assets* (\$000s)	Average LTD Ratio**
The Citizens National Bank of Park Rapids (Park Rapids, MN)	\$337,261	89.5%
Security Bank USA (Bemidji, MN)	\$217,192	85.9%
The First National Bank of Bemidji (Bemidji, MN)	\$979,144	68.8%
First National Bank North (Walker, MN)	\$785,963	67.9%
Northwoods Bank of Minnesota (Park Rapids, MN)	\$150,883	65.4%
Pine River State Bank (Pine River, MN)	\$175,217	59.0%
Western National Bank (Cass Lake, MN)	\$33,566	57.2%

*Assets as of 12/31/21, Call Report Data

**Average LTD from 1/1/2018-12/31/21, Call Report Data

Lending in Assessment Area

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

FNBB originated and purchased 85.0 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The analysis is based on a sample of 20 small business and 20 consumer loans originated or purchased 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		
	#	%	#	%		\$	%	\$	%	
Small Business	19	95.0	1	5.0	20	4,302	98.2	81	1.8	4,382
Consumer	15	75.0	5	25.0	20	183	83.9	35	16.1	218
Total	34	85.0	6	15.0	40	4,485	97.5	116	2.5	4,600

Description of Institution

FNBB is an intrastate community bank headquartered in Bemidji, Minnesota. As of December 31, 2021, FNBB had \$979 million in total assets. FNBB is wholly owned by First Bemidji Holding Company, a single-bank holding company located in Bemidji, MN. FNBB does not operate any subsidiaries. FNBB's related organization, The First National Bank Bemidji Foundation, is a 501(c)(3) non-profit organization with the mission of funding programs in the Bemidji community that benefit families.

FNBB operates in the state of Minnesota and has one AA which includes three counties in northern Minnesota. FNBB serves Beltrami County and surrounding counties, including Hubbard and Cass counties. FNBB operated six branches and seven automated teller machines (ATMs) during the evaluation period, all located within the city of Bemidji. Three branches offer full banking services. The other three locations are limited-service branches located in assisted living and nursing home facilities. There were no branch openings or closings during the evaluation period. The ATMs include five ATMs on premises, two of which are deposit taking. The other two ATMs are located at a health care facility and a grocery store. FNBB's business strategy is to continue to serve its community by growing its commercial and retail loan portfolios.

FNBB offers traditional community banking services. FNBB is a full-service financial institution offering traditional loan and deposit products, and services to commercial and consumer customers. FNBB also provides non-insured retail and business investing and financial planning services and products through a non-affiliated broker-dealer. As of December 31, 2021, FNBB reported \$363,272 million in outstanding loans, representing 37 percent of total assets. The loan portfolio consisted of 71.9 percent business loans, 15.2 percent home mortgage loans, 11.3 percent consumer loans, and 1.3 percent farm loans.

FNBB participated in the Small Business Association Paycheck Protection Program (PPP) during the COVID-19 pandemic. This loan program allowed small businesses to remain open during the pandemic by covering employment costs. FNBB helped more than 400 business obtain PPP loans totaling over \$48 million. In addition to assisting businesses to obtain PPP funding, FNBB purchased over \$14 thousand gift cards from businesses impacted by pandemic related shutdowns.

There are no known financial, legal, or other factors impeding FNBB's ability to help meet the credit needs of its AA. FNBB received a satisfactory rating at the prior CRA Performance Evaluation as of September 4, 2018. In the prior CRA Performance Evaluation, the lending and community development tests received satisfactory ratings.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNBB was evaluated under the intermediate small bank examination procedures, which include a lending test and a community development test to assess compliance with the CRA. The lending test evaluates FNBB's record of meeting the credit needs of its AA. The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and CD services.

The evaluation period for the lending test is January 1, 2019, through December 31, 2021. We determined FNBB's primary loan products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. Business loans and consumer loans were FNBB's primary loan products.

The evaluation period for the CD test is January 1, 2018, through December 31, 2021. We reviewed CD loans, investments, donations, and services submitted by bank management. Activities meeting the definition of CD are included in this evaluation.

Selection of Areas for Full-Scope Review

FNBB operates in the state of Minnesota and has one AA which includes three counties in Northern Minnesota. This AA was selected for a full-scope review.

Ratings

The bank's overall rating is a blend of the lending and CD test ratings.

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 (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Minnesota¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The dispersion of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The dispersion of business loans throughout geographies of different income levels is poor; however, the dispersion of consumer loans to borrowers of different income levels is reasonable.
- CD performance reflects excellent responsiveness to AA needs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Minnesota

FNBB's operations target the greater Bemidji area including Beltrami County and portions of Cass and Hubbard counties. The AA includes twelve census tracts: four moderate-income and eight middle-income. FNBB holds a leading 31 percent market share of deposits in the AA with \$796 million. Top competitors in the AA include First National Bank North with \$458 million and 18 percent deposit market share, and The Citizens National Bank of Park Rapids with \$298 million and 12 percent deposit market share. According to the Bureau of Labor Statistics, Beltrami County unemployment in 2021 equaled 3.7 percent, comparable to the state average of 3.4 percent. Nearly 17 percent of households are below the poverty level. Based on 2016 data from Greater Bemidji, Inc., a non-profit, charitable organization serving the greater Bemidji region, top employment industries in the area include health services, hotels and other service industries, and retail trade. According to the Minnesota Department of Employment and Economic Development, education is also an important industry in Beltrami County with several post-secondary institutions in the area. We discussed economic conditions with a community member who works for an affordable housing organization. The community contact stated there is a shortage of affordable housing as rental housing caters to students at a price point low-income individuals generally cannot afford.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

FNB Bemidji AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB Bemidji AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	33.3	66.7	0.0	0.0
Population by Geography	52,938	0.0	36.7	63.3	0.0	0.0
Housing Units by Geography	24,903	0.0	32.5	67.5	0.0	0.0
Owner-Occupied Units by Geography	13,923	0.0	24.2	75.8	0.0	0.0
Occupied Rental Units by Geography	5,773	0.0	59.3	40.7	0.0	0.0
Vacant Units by Geography	5,207	0.0	25.0	75.0	0.0	0.0
Businesses by Geography	4,084	0.0	38.0	62.0	0.0	0.0
Farms by Geography	206	0.0	12.6	87.4	0.0	0.0
Family Distribution by Income Level	13,017	25.1	20.1	21.4	33.4	0.0
Household Distribution by Income Level	19,696	27.4	16.8	19.0	36.8	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$141,341
			Median Gross Rent			\$665
			Families Below Poverty Level			13.3%

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

We completed a full-scope review of the FNB Bemidji's AA. We identified business and consumer lending as the primary loan products evaluation period. We reviewed a sample of business and consumer loans to evaluate lending test performance. Refer to Appendix A, Scope of Examination, for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

FNBB's performance under the Lending Test in Minnesota is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

FNBB's lending performance in the state of Minnesota is reasonable.

Distribution of Loans by Income Level of the Geography

FNBB exhibits reasonable geographic distribution of loans in the state.

Small Loans to Businesses

Refer to Table Q in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses is poor. The percentage of small business loans made in moderate-income geographies was well below the percentage of businesses in those geographies and below the aggregate percentage of all lenders.

Consumer Loans

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

The distribution of consumer loans is reasonable. The percentage of consumer loans made to moderate-income geographies exceeded the demographic comparator.

Distribution of Loans by Income Level of the Borrower

FNBB exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Small Loans to Businesses

Refer to Table R in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses by revenue is reasonable. The percentage of small business loans was near to the percentage of small businesses but exceeded the aggregate percentage of all lenders.

Consumer Loans

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

The distribution of loans to consumers is reasonable. The percentage of consumer loans to low-income individuals was near to the demographic comparator. The percentage of consumer loans to moderate-income individuals exceeded the demographic comparator.

Responses to Complaints

FNBB did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

FNBB's performance under the CD Test in the state of Minnesota is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

FNBB exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, considering FNBB's capacity and the need and availability of such opportunities in the bank's AA.

Number and Amount of Community Development Loans

FNBB exhibits excellent responsiveness to CD lending needs in the AA. The Community Development Loans table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
FNB Bemidji	56	100.0	33,366	100.0

FNBB originated 56 CD loans totaling \$33.4 million during the evaluation period, representing 34.8 percent of tier 1 capital. CD loans benefited the AA by supporting affordable housing, services to low- and moderate-income (LMI) individuals, and economic development.

Examples of CD loans in the AA include:

- Two loans totaling \$16.2 million to expand a business and create jobs in a moderate-income census tract.
- Operating line of credit totaling \$60 thousand to an organization that provides community services and educational programs to LMI individuals.
- Operating lines of credit totaling \$650 thousand to two businesses operating on the Red Lake Reservation that provide permanent jobs and services to LMI.

Number and Amount of Qualified Investments

FNBB exhibits adequate responsiveness to CD investment needs in the AA. The Qualified Investment table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments.

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
FNB Bemidji	3	950	34	2,182	37	100.0	3,132	100.0	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.

FNBB has 37 qualified CD investments totaling \$3.1 million, representing 2.7 percent of tier 1 capital. Current period investments in the AA include 32 donations totaling \$282 thousand. Qualified donations include cash donations to organizations providing community services such as healthcare, housing, food, and education to LMI individuals. FNBB holds one prior period investment in the AA totaling \$500 thousand.

In addition, FNBB holds four investments that impact a broader statewide area that benefits the AA. Two of these are current period investments totaling \$1.9 million. The remaining two are prior period investments totaling \$450 thousand.

Extent to Which the Bank Provides Community Development Services

FNBB exhibits good responsiveness to CD service needs in the AA. Fifteen employees provided over 1,400 hours of community service to seven different organizations. These organizations provided economic development opportunities, community services to LMI individuals, and affordable housing opportunities. The majority of these employees served in leadership capacities on boards or finance counsels for these charitable organizations.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(1/1/2018 to 12/31/2021)	
Bank Products Reviewed:	Lending Test: small business and consumer loans (1/1/2019-12/31/2021) CD Test: CD loans, qualified investments, and CD services (1/1/2018-12/31/2021)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
First National Bank of Bemidji Foundation	Affiliate	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota Non-MSA AA	Full Scope	Beltrami, Cass, and Hubbard Counties

Appendix B: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 C: 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 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.
- 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. The table also presents aggregate peer data for the years the data is available. 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.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
FNB Bemidji AA	60	\$12,874	100.0	381	0.0	--	0.0	38.0	23.3	28.9	62.0	76.7	71.1	0.0	--	0.0	0.0	--	0.0		
Total	60	\$12,874	100.0	381	0.0	--	0.0	38.0	23.3	28.9	62.0	76.7	71.1	0.0	--	0.0	0.0	--	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 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												2019-21	
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		
FNB Bemidji AA	20	\$4,352	100.0	381	85.3	75.0	48.6	4.5	25.0	10.2	--		
Total	20	\$4,352	100.0	381	85.3	75.0	48.6	4.5	25.0	10.2	--		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 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													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
FNB Bemidji AA	20	244	100.0	0.0	--	34.5	40.0	65.5	60.0	0.0	--	0.0	--	
Total	20	244	100.0	0.0	--	34.5	40.0	65.5	60.0	0.0	--	0.0	--	

Source: 2015 ACS; 01/01/2019 - 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													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
FNB Bemidji AA	20	244	100.0	27.4	25.0	16.8	25.0	19.0	25.0	36.8	25.0	0.0	--	
Total	20	244	100.0	27.4	25.0	16.8	25.0	19.0	25.0	36.8	25.0	0.0	--	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%