



PUBLIC DISCLOSURE

April 6, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ameriprise Bank FSB
Charter Number: 718164

901 3rd Avenue South
Minneapolis, MN 55402

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 Ameriprise Bank, FSB (Ameriprise or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Ameriprise Bank, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory lending within the Minneapolis-St. Paul-Bloomington MN-WI metropolitan statistical area (Minneapolis MSA), adequate lending activity, and excellent geographic and borrower income distribution.
- The Investment Test rating is based on satisfactory performance in the Minneapolis MSA and reflects a significant level of qualified investments and grants and excellent responsiveness to credit and Community Development (CD) needs.
- The Service Test rating is based on satisfactory performance in the Minneapolis MSA and reflects service delivery systems that are reasonably accessible to geographies and individuals of different income levels. The bank is a leader in providing CD services.

Lending in Assessment Area

A high percentage of the bank's loans are in its assessment area (AA).

The bank originated and purchased 61.2 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. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2025
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,478	66.7	738	33.3	2,216	449,319	50.8	434,705	49.2	884,024
Small Business	15	6.7	209	93.3	224	7,975	9.5	75,601	90.5	83,576
Total	1,493	61.2	947	38.8	2,440	457,294	47.3	510,306	52.7	967,600
Source: 1/1/2022 - 12/31/2025 Bank Data										
Due to rounding, totals may not equal 100.0%										

Description of Institution

Ameriprise is a federal savings bank headquartered in Minneapolis, MN. The bank is a subsidiary of Ameriprise Financial, Inc. (Ameriprise Financial), a \$176 billion diversified financial services company based in Minneapolis, MN. Ameriprise Financial provides financial and retirement planning, asset management, and insurance services to individuals, businesses, and institutions with approximately \$1.7 trillion in assets under management as of December 31, 2025.

Ameriprise operates its main office and one administrative branch in Ameriprise Financial's office building in downtown Minneapolis. The branch is not accessible to the public and does not accept physical deposits.

Ameriprise provides banking products to clients nationwide primarily through the Ameriprise Financial's Advisors network as well as online on the bank's website. The bank's business strategy is centered on providing Ameriprise Financial's clients with lending and deposit products that can be used in conjunction with other services that Ameriprise Financial offers. The bank's primary deposit products consist of a money market account and a sweep account. Both of these accounts sweep available uninvested cash balances from a client's brokerage account into an FDIC-insured deposit account. In 2025, Ameriprise introduced new products consisting of savings accounts, checking accounts, and certificates of deposits. Ameriprise provides lending products through a third-party residential loan referral program and other vendor partnerships for asset-based lending, lines of credit, and credit cards. Additionally, the bank purchases home mortgage loans from local lenders in the AA. Ameriprise is not actively engaged in commercial lending activities.

As of December 31, 2025, Ameriprise had total assets of \$25.3 billion, total loans of \$1.9 billion, and tier one capital of \$1.8 billion. The loan portfolio, by outstanding dollar volume, consisted of 51.6 percent consumer loans, 37.5 percent home mortgage loans, and 10.9 percent commercial loans.

There were no legal, financial, or other factors that impeded the bank's ability to help meet the credit, investment, and service needs of its AA during the evaluation period. Ameriprise's CRA performance was rated Satisfactory in the previous performance evaluation dated April 25, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, Investment Test, and Service Test is January 1, 2022, through December 31, 2025. Although Ameriprise does not originate home mortgage loans and is not

subject to Home Mortgage Disclosure Act (HMDA) reporting requirements, the bank maintains data on purchased home mortgage loans. We reviewed these internal bank records to analyze home mortgage purchase activity. Examiners also analyzed small loans to businesses reported by the bank under the Community Reinvestment Act.

For purposes of this evaluation, at least 20 loans within the AA during the evaluation period are needed for meaningful analysis. During the evaluation period, Ameriprise purchased 15 small loans to businesses inside the AA. Due to this limited volume, we did not include small loans to businesses in our evaluation.

Affiliate activities were considered under both the Investment and Service Tests. Ameriprise Financial grants and employee CD service hours were considered in this evaluation.

Selection of Areas for Full-Scope Review

We performed a full-scope review of the bank's performance in the Minneapolis MSA. This MSA is Ameriprise's only AA.

Refer to **Appendix A: Scope of Examination** for additional details.

Ratings

The bank's overall rating is based on the full-scope review of the Minneapolis MSA. The volume of loans to small businesses did not provide a meaningful analysis. As a result, the CRA rating is based solely on the analysis of home mortgage loans in the Minneapolis MSA.

Evaluation guidelines generally give equal weight to geographic and borrower loan distributions by income level. For this analysis, the bank's performance was evaluated primarily against aggregate lenders rather than demographic factors, unless performance context dictated otherwise. While the analysis evaluated both loan counts and dollar volume, it emphasized loan volume (excluding community development loans) as a more accurate metric of individuals served.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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.

Multistate MSA Rating

Minneapolis MSA

CRA rating for the Minneapolis MSA: 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 activity reflects adequate responsiveness to AA credit needs.
- A high percentage of loans are inside the bank's AA.
- The bank exhibits excellent geographic and borrower income distribution in the AA.
- The volume of qualified investments including grants is significant with excellent responsiveness to CD needs in the AA.
- The service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA.
- The bank is a leader in providing CD services.

Description of Institution's Operations in the Minneapolis MSA

Ameriprise delineated the Minneapolis MSA as the bank's single AA. The AA consists of the entire 15 counties comprising the Minneapolis MSA. The bank operates a home office and limited-service branch located in Ameriprise Financials' office in downtown Minneapolis. The branch is not accessible to the public and does not accept physical deposits. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- and moderate-income (LMI) geographies. Refer to Appendix A for a listing of the bank's counties within the AA.

According to the June 30, 2025, Federal Deposit Insurance Corporation (FDIC) Market Share Report, Ameriprise's deposits equaled \$22.5 billion in the AA. It is important to note that all of Ameriprise's deposits are attributed to the bank's main office in Minneapolis; however, the bank receives deposits from its nationwide client base. The bank ranked third out of 127 institutions with a market share of 9.7 percent, placing it in the top three percent of deposit-taking banks in the AA. Considering that the bank's deposits are gathered from customers across all 50 states, the bank's deposit market share in the AA is inflated.

Employment and Economic Factors

According to the United States Bureau of Labor Statistics, the unemployment rates ranged from a low of 1.9 percent in May of 2022 to a high of 4.1 percent in August 2025.

According to the November 2025 Moody's Analytics report, the Minneapolis labor market improved with net gains in healthcare, while employment numbers for manufacturing and private industry slowed in 2025. Economic drivers for Minneapolis include major research institutions, corporate headquarters, a highly educated workforce, and positive population trends. The top five employers in Minneapolis are as follows: Fairview Health Services, Target Corporation, Allina Health System, University of Minnesota, and HealthPartners Inc.

Community Contacts

We reviewed information from three community contacts conducted during the evaluation period. These contacts included a nonprofit community development organization involved in affordable housing and economic development, a certified development company that assists small businesses with obtaining guaranteed Small Business Administration (SBA) loans, and a state organization that provides essential services and infrastructure that supports communities and businesses. Additionally, we gathered information about community credit needs and local economic conditions through a roundtable event with several affordable housing organizations. Identified needs included downpayment assistance programs, proprietary bank products featuring lower interest rates, and alternative credit underwriting designed to meet the credit needs of moderate-income borrowers. Further, contacts identified the need for financing for new and expanding small businesses, including various lending programs available through the SBA.

Assessment Area: Minneapolis MSA						
2022-2025						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	892	5.49	21.64	45.29	26.35	1.23
Population by Geography	3,690,261	4.93	20.26	46.86	27.18	0.77
Housing Units by Geography	1,456,697	4.67	20.79	47.34	26.61	0.59
Owner-Occupied Housing by Geography	979,442	2.18	16.83	50.63	20.29	0.07
Occupied Rental Units by Geography	411,006	10.30	29.81	39.85	18.28	1.76
Vacant Units by Geography	66,249	6.54	23.51	45.16	23.92	0.88
Businesses by Geography	143,002	3.98	19.19	44.41	31.56	0.86
Farms by Geography	4,792	1.73	16.13	54.53	27.46	0.15
Family Distribution by Income Level	889,700	19.62	18.21	23.15	39.02	0.00
Household Distribution by Income Level	1,390,448	22.97	16.85	19.16	41.02	0.00
Unemployment rate (%)	3.69	7.33	5.19	3.29	2.67	6.21
Households Below Poverty Level (%)	8.09	28.64	12.15	6.08	4.44	34.48
Median Family Income (33460 - Minneapolis-St Paul-Bloomington, MN-WI MSA)		\$103,977	Median Housing Value			\$261,700
Median Family Income (33460 - Minneapolis-St Paul-Bloomington, MN-WI MSA) for 2025		\$131,700	Median Gross Rent			\$1,153
			Families Below Poverty Level			5.08
FFIEC File – 2020, 2024 Census						
2025 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in the Minneapolis MSA

The Minneapolis MSA is Ameriprise's only AA. We conducted a full-scope review of the AA. In determining performance in the Lending Test, we assessed Ameriprise's mortgage lending performance based on loans purchased from January 1, 2022, through December 31, 2025.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MINNEAPOLIS MSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Minneapolis MIS was good.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Table 3: Lending Activity							2022-2025	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Minneapolis MSA	1,478	15	0	0	0	1,493	100.00	100.00
Total	1,478	15	0	0	0	1,493	100.00	100.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Minneapolis MSA	449,319	7,975	0	0	0	457,294	100.00	100.00
Total	449,319	7,975	0	0	0	457,294	100.00	100.00
Source: 1/1/2022 - 12/31/2025 Bank Data Due to rounding, totals may not equal 100.0%								

The tables above include data on all loan purchases in the AA during the evaluation period. The OCC did not analyze small loans to businesses due to the low volume of loans purchased. Lending volume in relation to the bank's deposits, competition, and market presence was considered when determining responsiveness to AA credit needs.

Ameriprise's home lending market share in the AA is adequate compared to its deposit market share. According to the FDIC's June 30, 2025, Deposit Market Share report, Ameriprise's deposit market share ranked in the top three percent in the AA. The top five banks by deposit market share were U.S. Bank N.A., Wells Fargo N.A., Ameriprise Bank, Old National Bank, and The Huntington National Bank. These banks had a combined deposit market share of 75 percent. According to 2024 peer mortgage data, 710 lenders originated and purchased reportable loans in the AA. In 2024, Ameriprise purchased 398 home mortgage loans in the AA. Based upon this volume, the bank would have a 0.4 percent market share and rank 51st out of 710 HMDA lenders, placing it in the top seven percent of all HMDA lenders in the AA. The bank's business strategy impacts its ability to originate a significant volume of home mortgage loans compared to other lenders. Considering Ameriprise's business strategy, the bank's inflated deposit market share in the AA, and the highly competitive mortgage lending market, Ameriprise's lending activity is adequate.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table 7 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The bank's percentage of home mortgage loans in low-income and moderate-income geographies exceeded the percentage of owner-occupied housing and the aggregate distribution of loans in those geographies.

Lending Gap Analysis

Examiners reviewed both summary reports and maps and analyzed home mortgage loan purchase activity to identify gaps in the geographic distribution of loans in the AA. Examiners did not identify any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels.

Home Mortgage Loans

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

The distribution of home mortgage loans is excellent. The bank's percentage of loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of lending in the AA. The bank's percentage of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate distribution of lending in the AA.

Community Development Lending

Ameriprise did not originate any CD loans during the evaluation period, which had a neutral impact on the lending performance in the AA. The bank's CD lending opportunities are impacted by the fact that Ameriprise is not actively engaged in commercial lending.

Product Innovation and Flexibility

The institution made little use of innovative and/or flexible lending practices in order to serve AA credit needs. While Ameriprise does not originate home mortgage loans, the bank refers clients to third-party originators that offer a wide range of home mortgage products.

INVESTMENT TEST

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

Based on a full-scope review, the institution's performance in the Minneapolis MSA was good.

The institution had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments									2022-2025	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis MSA	8	29,251	7,480	73,953	7,488	100.0	103,205	100.0	--	--
Total	8	29,251	7,480	73,953	7,488	100.0	103,205	100.0	--	--

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

The dollar volume of current and prior period investments totaled \$103.2 million and represented 5.7 percent of tier 1 capital. Qualified investments consisted of 14 equity equivalent investments totaling \$27.5 million and eight mortgage-backed securities (MBS) totaling \$68.9 million. The MBS are backed by CRA eligible residential mortgage loans to LMI borrowers in the AA. During the evaluation period, Ameriprise made grants totaling \$5.8 million to 294 organizations involved in affordable housing and community development services targeted to LMI individuals. Of the total dollar amount of qualified investments and grants, \$80.9 million (78.4 percent) were related to affordable housing, \$8.8 million (8.5 percent) supported community development services, \$4.9 million (4.7 percent) were related to economic development, and \$8.5 million (8.3 percent) supported multiple community development purposes.

Examples of CD qualified investments in the AA include:

- A \$4 million equity equivalent investment in a local nonprofit affordable housing organization. Ameriprise's investment supported critical development and preservation of affordable housing units and provided additional funding for the nonprofit's internal revolving loan fund. Ameriprise contributed additional grants totaling approximately \$176 thousand and corporate matching funds totaling \$7 thousand to support the nonprofit's affordable housing efforts.
- A \$2 million equity equivalent investment in an affordable housing organization that works to provide naturally occurring affordable housing and develop new affordable housing. The bank's investment provided the organization with long-term capital to address local affordable housing needs. Ameriprise contributed additional grants totaling \$140 thousand and corporate matching funds totaling \$2 thousand to this organization.
- Financial grants totaling \$317 thousand to a community organization that provides support services and affordable housing for LMI single mothers and their children to promote long-term economic stability. The nonprofit provides career counseling, financial capacity and life skills education, and a child development center. Ameriprise also contributed corporate matching funds totaling approximately \$8 thousand to this organization.

Other Factors Considered in our Analysis under Performance Tests

Nationwide Community Development Activities

During the evaluation period, the bank funded three nationwide grants totaling approximately \$489 thousand. These grants provided funding to revitalize and stabilize federal disaster areas in California, Hawaii, and several southeastern states. These nationwide investments had a neutral impact and supported the Investment Test conclusion for the Minneapolis MSA.

SERVICE TEST

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

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

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Table 5: Distribution of Branch Delivery Systems												2022-2025	
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Minneapolis MSA	100.0	1	100.0	0.0	0.0	0.0	100.0	0.0	4.93	20.26	46.86	27.18	0.77
Total	100.0	1	100.0	0.0	0.0	0.0	100.0	0.0	4.93	20.26	46.86	27.18	0.77
Source: FFIEC File – 2020, 2024 Census													
1/1/2022 - 12/31/2025 Bank Data													
Due to rounding, totals may not equal 100.0%													

Accessibility of delivery systems are impacted by the bank's business model and strategy. The bank operates one location in the AA within an upper-income census tract. Ameriprise's business model provides banking services to clients and new bank customers across the United States primarily through online banking applications. Ameriprise's products and services are made available largely through the Ameriprise Financials' Advisors network. The bank's deposit products consist of money market and sweep accounts related to client's brokerage accounts. The bank also offers certificates of deposits, savings and checking accounts, and debit cards. Home mortgage and secured asset-based lending products are originated through third-party relationships.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Minneapolis MSA	0	1	0	0	0	-1	0
Total	0	1	0	0	0	-1	0
1/1/2022 - 12/31/2025 Bank Data							

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to low- and moderate-income individuals. In early 2025, Ameriprise consolidated its two branches in downtown Minneapolis to one location. The bank moved the main office to the same location as the limited-service branch at 901 3rd Avenue South, the same location as Ameriprise Financial. The branch is an administrative office and is not open to the public and does not accept physical deposits.

Services, including where appropriate, business hours, do not vary in a way that inconveniences various portions of the AA, particularly low- and moderate-income geographies and/or individuals. While the bank only has one location, all customers have access to the same products and services through online, mobile, and telephone banking applications.

Community Development Services

The bank is a leader in providing CD services.

Ameriprise employees provide a good level of responsiveness to community needs through CD services. Approximately 175 employees provided 7,845 hours volunteering with 59 different organizations during the evaluation period, providing affordable housing assistance or community development services to LMI individuals. Additionally, 44 employees served in leadership positions on the Board of Directors or a committee across 42 different community organizations.

The following are examples of qualified CD services in the AA:

- Three employees provided 1,075 service hours to an organization that supports workforce development and financial education for unemployed or underemployed LMI individuals.
- Three employees provided 270 hours of tax preparation services for LMI individuals and families during tax season.
- Two employees contributed 97 hours of financial expertise as board members of an organization that provides emergency shelter and supportive housing to LMI individuals and families who are experiencing homelessness.

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:	1/1/2022 to 12/31/2025	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Ameriprise Financial, Inc.	Holding Company	Qualified investments and community development services
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Minneapolis-St. Paul-Bloomington, MN-WI MSA (Minneapolis MSA)	Full-scope	Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Mille Lacs, Ramsey, Scott, Sherburne, Washington, and Wright Counties in MN; St. Croix and Pierce Counties in WI

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Ameriprise Bank, FSB	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Minneapolis MSA	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 the 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 low- and moderate-income 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): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Minneapolis MMSA	1,478	449,319	100.00	299,106	2.18	3.32	2.82	16.83	24.29	17.37	50.63	44.93	49.84	30.29	27.27	29.82	0.07	0.20	0.15
Total	1,478	449,319	100.00	299,106	2.18	3.32	2.82	16.83	24.29	17.37	50.63	44.93	49.84	30.29	27.27	29.82	0.07	0.20	0.15
Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "2025 Aggregate" data not available																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Minneapolis MMSA	1,478	440,319	100.00	299,106	19.62	12.99	10.77	18.21	27.27	25.07	23.15	25.44	22.57	39.02	34.30	27.34	--	--	14.26
Total	1,478	449,319	100.00	299,106	19.62	12.99	10.77	18.21	27.27	25.07	23.15	25.44	22.57	39.02	34.30	27.34	--	--	14.26
Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "2025 Aggregate HMDA" data not available																			
Due to rounding, totals may not equal 100.0%																			