



North Star Bank

COMMUNITY REINVESTMENT ACT PUBLIC FILE

Primary Regulator: FDIC (Federal Deposit Insurance Corporation)
Established: February 3, 1947
Insured Since: September 14, 1948
Website: www.northstarbank.com

Availability of Disclosure Statements

Financial Information about our bank is available to you. To obtain a copy of the Annual Disclosure Statement and/or aggregate disclosure statements please refer to the Federal Financial Institutions Examination Council (FFIEC) website at www.ffiec.gov

Branch Office Opened or Closed

The bank has not opened a branch office during the prior two calendar years 2024 and 2025.

The bank has not closed a regular branch office during the prior two calendar years 2024 and 2025.

Written Public Comments

The bank has not received written comments from the public that specifically relate to the bank's performance in helping to meet community credit needs for the prior two calendar years 2024 and 2025.

Quarterly Loan-to-Deposit Ratios*

Figures for determining the Loan-to-Deposit ratios are pulled from the Bank's call reports. Call reports can be viewed on the Federal Financial Institutions Examination Council (FFIEC) website at www.ffiec.gov. The numbers below can also be found on the FFIEC website under the UBPR Executive Summary report.

March 31, 2026	68.86	March 31, 2025	72.82	March 31, 2024	77.06
June 30, 2026	x	June 30, 2025	73.34	June 30, 2024	74.36
September 30, 2026	x	September 30, 2025	68.80	September 30, 2024	70.08
December 31, 2026	x	December 31, 2025	66.78	December 31, 2024	73.74

***Uniform Bank Performance Report. Net loans & Leases to deposits.**

FULL-SERVICE LOCATIONS & ATM LOCATIONS

MAIN OFFICE & ATM	BRANCH OFFICE & ATM
<p><u>Roseville</u> 1820 North Lexington Avenue Roseville, MN 55113 (Census Tract 0417.00)</p>	<p><u>White Bear Lake</u> 4661 Highway 61 White Bear Lake, MN 55110 (Census Tract 0405.02)</p>
<p><u>Lobby</u> Monday-Friday 9:00 a.m. until 5:00 p.m.</p> <p><u>Drive-Thru</u> Monday-Friday 8:00 a.m. until 5:00 p.m. Saturday 9:00 a.m. until Noon</p> <p><u>ATM</u> Every Day 24 hours a day</p>	<p><u>Lobby</u> Monday-Friday 9:00 a.m. until 5:00 p.m.</p> <p><u>Drive-Thru</u> Monday-Friday 8:00 a.m. until 5:00 p.m. Saturday 9:00 a.m. until Noon</p> <p><u>ATM</u> Every Day 24 hours a day</p>

LIMITED-SERVICE LOCATION & ITM

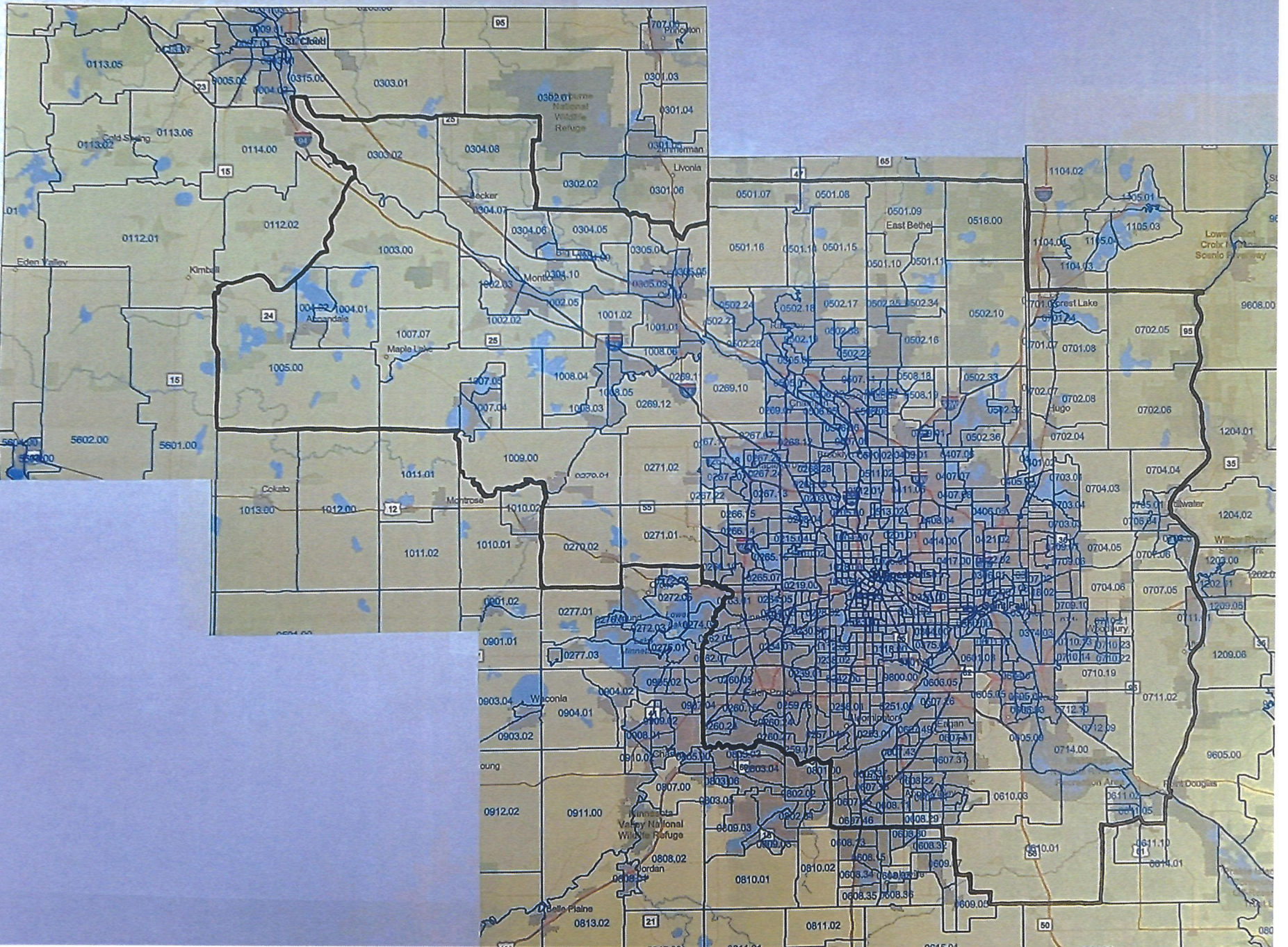
LOAN PRODUCTION OFFICE/DEPOSIT PRODUCTION OFFICE (LPO/DPO) & ITM

<p><u>Monticello</u> Open Date: March 6, 2023 530 Walnut St Monticello, MN 55362 (Census Tract 1002.03)</p>	<p><u>Maple Grove</u> Open Date: July 9, 2024 13610 Grove Dr Maple Grove, MN 55311 (Census Tract 0267.24)</p>
<p><u>Lobby & ITM</u> Monday-Friday 9:00 a.m. until 5:00 p.m.</p>	

CRA Facility-Based Assessment Area Map & Census Tracts: See map and listing attached.

NORTH STAR BANK CRA FACILITY-BASED ASSESSMENT AREA

FFIEC FFIEC Geocoding/Mapping System – 2024



All of the following Counties: Anoka, Ramsey, and Washington // Part of the following Counties: Dakota, Hennepin, Sherburne, and Wright.

Effective: 4th Quarter 2023

**North Star Bank
Community Reinvestment Act (CRA)
Assessment Area**

Metropolitan Statistical Area: 33460
State: 27 – Minnesota
Updated for 2020 Census as of December 31, 2023

County Name & County Code	Number of Census Tracts
Anoka 003	90
Dakota 037	82
Hennepin 053	315
Ramsey 123	143
Sherburne 141	11
Washington 163	59
Wright 171	21

Census Tract Income Level	Total Assessment Area Count
Low	49
Moderate	170
Middle	304
Upper	187
Unknown	11

**North Star Bank
Community Reinvestment Act (CRA)
Assessment Area**

Metropolitan Statistical Area: 33460
State: 27 – Minnesota
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Anoka County: Code 003

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0501.07	Moderate	0502.38	Upper	0508.18	Middle
0501.08	Middle	0502.39	Upper	0508.19	Upper
0501.09	Middle	0502.40	Middle	0508.20	Middle
0501.10	Middle	0502.41	Middle	0508.21	Middle
0501.11	Middle	0504.01	Middle	0508.22	Moderate
0501.14	Middle	0504.02	Middle	0508.23	Middle
0501.15	Middle	0505.01	Moderate	0508.24	Middle
0501.16	Upper	0505.04	Low	0508.25	Middle
0502.08	Middle	0505.05	Moderate	0508.26	Middle
0502.10	Middle	0506.02	Moderate	0508.27	Middle
0502.15	Upper	0506.05	Middle	0508.28	Moderate
0502.16	Upper	0506.06	Moderate	0508.29	Middle
0502.17	Upper	0506.07	Moderate	0509.01	Moderate
0502.18	Middle	0506.08	Moderate	0509.02	Middle
0502.19	Middle	0506.09	Middle	0510.01	Moderate
0502.20	Middle	0506.11	Middle	0510.02	Middle
0502.22	Middle	0506.12	Middle	0511.01	Moderate
0502.23	Upper	0507.02	Middle	0511.02	Moderate
0502.24	Middle	0507.04	Moderate	0511.03	Moderate
0502.26	Upper	0507.06	Moderate	0512.01	Moderate
0502.27	Middle	0507.07	Middle	0512.02	Moderate
0502.28	Middle	0507.09	Middle	0512.03	Moderate
0502.29	Middle	0507.10	Moderate	0512.06	Moderate
0502.30	Upper	0507.11	Middle	0513.02	Moderate
0502.32	Middle	0507.12	Moderate	0513.04	Moderate
0502.33	Middle	0508.07	Moderate	0513.05	Moderate
0502.34	Middle	0508.08	Moderate	0514.00	Moderate
0502.35	Moderate	0508.10	Moderate	0515.01	Moderate
0502.36	Upper	0508.11	Middle	0515.02	Middle
0502.37	Middle	0508.16	Middle	0516.00	Middle

Total Assessment Area Count = 90

**North Star Bank
Community Reinvestment Act (CRA)
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Metropolitan Statistical Area: 33460
State: 27 – Minnesota
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Dakota County: Code 037

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0601.01	Middle	0607.17	Middle	0608.05	Middle
0601.02	Middle	0607.21	Middle	0608.06	Middle
0601.03	Middle	0607.25	Middle	0608.11	Middle
0601.04	Moderate	0607.26	Moderate	0608.12	Middle
0601.05	Moderate	0607.27	Middle	0608.22	Middle
0602.01	Moderate	0607.28	Upper	0608.23	Upper
0602.02	Middle	0607.29	Upper	0608.24	Middle
0603.01	Moderate	0607.31	Upper	0608.28	Middle
0603.02	Middle	0607.32	Upper	0608.29	Middle
0604.01	Moderate	0607.33	Middle	0608.38	Middle
0604.02	Moderate	0607.34	Upper	0608.39	Upper
0605.02	Moderate	0607.35	Moderate	0608.40	Upper
0605.03	Middle	0607.37	Moderate	0608.41	Middle
0605.05	Middle	0607.38	Middle	0610.01	Middle
0605.06	Middle	0607.39	Middle	0610.03	Upper
0605.07	Middle	0607.42	Middle	0610.05	Moderate
0605.08	Upper	0607.43	Middle	0610.07	Middle
0605.09	Middle	0607.44	Upper	0610.08	Middle
0606.03	Upper	0607.45	Middle	0610.09	Upper
0606.04	Upper	0607.46	Moderate	0610.10	Upper
0606.05	Middle	0607.47	Middle	0610.11	Middle
0606.06	Upper	0607.48	Middle	0611.02	Middle
0607.09	Middle	0607.49	Middle	0611.05	Moderate
0607.10	Moderate	0607.50	Moderate	0611.06	Middle
0607.11	Moderate	0607.51	Upper	0611.09	Middle
0607.13	Middle	0607.52	Upper	0611.11	Middle
0607.14	Middle	0607.53	Moderate		
0607.16	Upper	0607.54	Middle		

Total Assessment Area Count = 82

**North Star Bank
Community Reinvestment Act (CRA)
Assessment Area**

Metropolitan Statistical Area: 33460
State: 27 – Minnesota
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Hennepin County: Code 053

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0001.01	Moderate	0204.00	Moderate	0236.00	Upper
0001.02	Low	0205.00	Moderate	0237.00	Upper
0003.00	Middle	0206.00	Moderate	0238.01	Upper
0006.01	Middle	0207.00	Middle	0238.02	Upper
0006.03	Upper	0208.01	Moderate	0239.01	Upper
0011.00	Moderate	0208.04	Middle	0239.02	Upper
0017.00	Moderate	0209.02	Middle	0239.03	Upper
0022.00	Low	0209.03	Middle	0240.03	Middle
0024.00	Moderate	0210.01	Moderate	0240.04	Moderate
0027.00	Moderate	0210.02	Middle	0240.05	Middle
0032.00	Moderate	0211.00	Moderate	0240.06	Upper
0033.00	Low	0212.00	Middle	0241.00	Middle
0038.01	Moderate	0213.00	Moderate	0242.00	Middle
0038.02	Unknown	0214.00	Middle	0243.00	Middle
0059.01	Low	0215.01	Middle	0244.00	Moderate
0059.02	Low	0215.02	Low	0245.00	Middle
0068.00	Low	0215.03	Moderate	0246.00	Middle
0077.00	Unknown	0215.04	Moderate	0247.00	Middle
0078.01	Low	0215.05	Middle	0248.01	Moderate
0081.00	Moderate	0216.01	Middle	0248.02	Moderate
0082.00	Moderate	0216.02	Upper	0249.03	Moderate
0083.00	Low	0217.00	Upper	0249.04	Moderate
0084.00	Moderate	0218.00	Upper	0251.00	Middle
0085.00	Moderate	0219.00	Upper	0252.01	Moderate
0095.00	Moderate	0220.00	Upper	0252.05	Middle
0096.00	Middle	0221.01	Middle	0253.01	Middle
0106.00	Upper	0221.02	Middle	0253.02	Moderate
0107.00	Upper	0222.00	Middle	0254.01	Moderate
0110.00	Upper	0223.01	Upper	0254.03	Moderate
0117.03	Upper	0223.02	Moderate	0256.01	Middle
0117.04	Upper	0224.00	Middle	0256.03	Middle
0118.00	Upper	0227.00	Middle	0256.05	Middle
0119.98	Middle	0228.01	Upper	0257.02	Middle
0120.01	Upper	0228.02	Upper	0257.03	Upper
0120.03	Middle	0229.01	Upper	0257.04	Middle
0121.01	Middle	0229.02	Upper	0258.01	Middle
0121.02	Middle	0230.00	Middle	0258.02	Middle
0201.01	Upper	0231.00	Upper	0258.03	Middle
0201.02	Middle	0232.01	Middle	0258.05	Middle
0202.01	Moderate	0232.02	Moderate	0259.05	Upper
0202.02	Low	0233.00	Middle	0259.06	Middle
0203.01	Moderate	0234.01	Moderate	0259.07	Upper
0203.02	Low	0234.02	Moderate	0259.08	Upper
0203.03	Moderate	0235.01	Middle	0259.09	Middle
0203.04	Moderate	0235.02	Upper	0260.05	Middle

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Hennepin County Con't: Code 053

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0260.06	Middle	0266.16	Upper	0271.02	Upper
0260.07	Upper	0266.17	Upper	1002.00	Moderate
0260.13	Upper	0267.02	Moderate	1004.00	Low
0260.14	Upper	0267.06	Middle	1005.00	Moderate
0260.15	Upper	0267.07	Middle	1007.00	Moderate
0260.19	Moderate	0267.08	Middle	1008.00	Moderate
0260.20	Middle	0267.11	Middle	1009.00	Moderate
0260.21	Upper	0267.12	Middle	1012.00	Middle
0260.23	Middle	0267.13	Upper	1013.00	Moderate
0260.24	Upper	0267.17	Upper	1016.00	Low
0260.25	Upper	0267.18	Upper	1018.00	Moderate
0260.26	Upper	0267.19	Upper	1019.00	Middle
0260.27	Upper	0267.20	Upper	1020.00	Moderate
0260.28	Upper	0267.21	Middle	1021.00	Low
0261.01	Middle	0267.22	Upper	1025.00	Unknown
0261.03	Upper	0267.23	Upper	1026.00	Moderate
0261.04	Middle	0267.24	Upper	1028.00	Low
0262.01	Upper	0267.25	Middle	1030.00	Upper
0262.02	Upper	0267.26	Middle	1031.00	Middle
0262.05	Upper	0268.07	Moderate	1034.00	Low
0262.06	Upper	0268.09	Moderate	1036.00	Upper
0262.07	Upper	0268.11	Moderate	1037.00	Upper
0262.08	Upper	0268.12	Middle	1039.00	Unknown
0263.01	Upper	0268.14	Middle	1040.01	Unknown
0263.02	Middle	0268.15	Middle	1040.02	Moderate
0264.03	Middle	0268.16	Middle	1041.00	Low
0264.04	Upper	0268.18	Moderate	1044.00	Upper
0264.05	Middle	0268.19	Low	1048.01	Low
0264.06	Moderate	0268.22	Middle	1048.02	Low
0265.05	Upper	0268.23	Upper	1049.01	Unknown
0265.07	Middle	0268.24	Upper	1049.02	Low
0265.08	Upper	0268.25	Middle	1051.00	Upper
0265.09	Upper	0268.26	Upper	1052.01	Middle
0265.10	Middle	0268.27	Low	1052.04	Upper
0265.11	Moderate	0268.28	Moderate	1054.00	Middle
0265.14	Middle	0269.03	Middle	1055.00	Upper
0265.15	Middle	0269.06	Middle	1056.00	Moderate
0265.16	Middle	0269.07	Upper	1057.00	Middle
0266.05	Upper	0269.08	Middle	1060.00	Low
0266.06	Upper	0269.10	Upper	1062.00	Moderate
0266.09	Upper	0269.11	Upper	1064.00	Upper
0266.10	Upper	0269.12	Upper	1065.00	Upper
0266.11	Upper	0270.01	Upper	1066.00	Upper
0266.14	Upper	0270.02	Upper	1067.00	Middle
0266.15	Upper	0271.01	Upper	1069.00	Moderate

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Hennepin County Con't: Code 053

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
1070.00	Moderate	1098.00	Upper	1225.00	Middle
1074.00	Moderate	1099.00	Middle	1226.00	Upper
1075.00	Middle	1100.00	Moderate	1255.00	Moderate
1076.00	Middle	1101.00	Middle	1256.00	Upper
1080.00	Upper	1102.00	Middle	1257.00	Low
1086.00	Moderate	1104.00	Middle	1258.00	Moderate
1087.00	Middle	1105.00	Middle	1259.00	Low
1088.00	Moderate	1108.00	Middle	1260.00	Low
1089.00	Middle	1109.00	Middle	1261.01	Middle
1090.00	Upper	1111.00	Middle	1261.02	Upper
1091.00	Upper	1112.00	Upper	1262.01	Upper
1092.00	Middle	1113.00	Upper	1262.02	Upper
1093.00	Middle	1114.00	Upper	1263.00	Middle
1094.00	Moderate	1115.00	Upper	9800.00	Unknown
1097.00	Middle	1116.00	Upper	9801.00	Unknown

Total Assessment Area Count = 315

Sherburne County: Code 141

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0303.02	Middle	0304.08	Middle	0305.04	Upper
0304.05	Middle	0304.09	Moderate	0305.05	Middle
0304.06	Middle	0304.10	Middle	0305.06	Middle
0304.07	Middle	0305.03	Middle		

Total Assessment Area Count = 11

**North Star Bank
Community Reinvestment Act (CRA)
Assessment Area**

North Star Bank
Community Reinvestment Act (CRA) Assessment Area
Metropolitan Statistical Area: 33460 State: 27 – Minnesota
Updated for 2020 Census as of December 31, 2023

Ramsey County: Code 053

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0301.00	Middle	0345.00	Moderate	0407.06	Upper
0302.01	Middle	0346.01	Moderate	0407.07	Middle
0302.02	Middle	0346.02	Moderate	0407.08	Middle
0303.00	Middle	0347.01	Moderate	0407.09	Upper
0304.00	Low	0347.02	Moderate	0408.01	Middle
0305.00	Low	0349.00	Upper	0408.04	Middle
0306.01	Low	0350.00	Upper	0408.05	Middle
0306.02	Moderate	0351.00	Upper	0409.01	Middle
0307.02	Moderate	0352.00	Upper	0409.02	Moderate
0307.03	Moderate	0353.00	Upper	0410.01	Middle
0307.04	Low	0355.00	Middle	0410.02	Middle
0308.00	Moderate	0357.00	Upper	0411.03	Moderate
0309.00	Moderate	0358.00	Upper	0411.04	Middle
0310.00	Moderate	0359.00	Middle	0411.05	Middle
0311.00	Moderate	0360.00	Upper	0411.06	Middle
0312.00	Middle	0361.00	Moderate	0411.07	Moderate
0313.00	Low	0363.00	Upper	0412.00	Moderate
0314.00	Low	0364.00	Upper	0413.01	Middle
0315.00	Low	0365.00	Upper	0413.02	Moderate
0316.00	Low	0366.00	Upper	0414.00	Middle
0317.01	Moderate	0367.00	Moderate	0415.00	Middle
0317.02	Low	0368.00	Moderate	0416.01	Middle
0318.01	Low	0369.00	Low	0416.02	Moderate
0318.02	Moderate	0370.00	Middle	0417.00	Middle
0319.00	Upper	0371.00	Moderate	0418.00	Middle
0320.00	Middle	0372.00	Moderate	0419.00	Upper
0321.00	Middle	0374.02	Moderate	0420.01	Moderate
0322.00	Middle	0374.03	Low	0420.02	Moderate
0323.00	Moderate	0375.00	Upper	0421.01	Moderate
0324.00	Low	0376.01	Middle	0421.02	Middle
0325.00	Low	0376.03	Low	0422.01	Moderate
0326.00	Moderate	0376.04	Moderate	0422.02	Middle
0327.00	Low	0401.01	Middle	0423.01	Middle
0330.00	Moderate	0401.02	Upper	0423.02	Middle
0331.00	Low	0402.00	Upper	0424.01	Middle
0332.00	Middle	0403.01	Middle	0424.02	Moderate
0333.00	Middle	0403.02	Moderate	0425.01	Moderate
0334.00	Low	0404.01	Middle	0425.03	Upper
0335.00	Low	0404.02	Middle	0425.04	Middle
0336.00	Low	0405.02	Middle	0426.01	Moderate
0337.00	Low	0405.03	Middle	0426.02	Middle
0338.00	Moderate	0405.04	Middle	0427.00	Moderate
0339.00	Moderate	0406.01	Upper	0428.00	Low
0340.00	Moderate	0406.03	Upper	0429.00	Upper
0342.01	Middle	0406.05	Middle	0430.01	Upper
0342.03	Upper	0406.06	Moderate	0430.02	Upper
0342.04	Middle	0407.04	Middle	9800.00	Unknown
0344.00	Moderate	0407.05	Upper		

Total Assessment Area Count = 143

**North Star Bank
Community Reinvestment Act (CRA)
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Metropolitan Statistical Area: 33460
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Washington County: Code 163

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
0701.03	Middle	0706.03	Middle	0710.13	Middle
0701.04	Moderate	0706.04	Middle	0710.14	Upper
0701.05	Upper	0707.03	Middle	0710.16	Upper
0701.07	Middle	0707.04	Middle	0710.19	Upper
0701.08	Middle	0707.05	Upper	0710.20	Upper
0702.04	Middle	0707.06	Upper	0710.21	Middle
0702.05	Middle	0708.01	Unknown	0710.22	Upper
0702.06	Upper	0708.02	Unknown	0710.23	Upper
0702.07	Upper	0709.06	Middle	0710.24	Middle
0702.08	Middle	0709.07	Middle	0710.25	Middle
0703.01	Upper	0709.09	Middle	0711.01	Middle
0703.03	Upper	0709.10	Middle	0711.02	Upper
0703.04	Middle	0709.11	Moderate	0712.07	Middle
0704.03	Middle	0709.12	Moderate	0712.08	Middle
0704.04	Upper	0710.01	Moderate	0712.09	Middle
0704.05	Upper	0710.03	Moderate	0712.10	Middle
0704.06	Middle	0710.06	Middle	0712.11	Upper
0705.01	Upper	0710.10	Upper	0713.00	Middle
0705.02	Middle	0710.11	Upper	0714.00	Middle
0706.02	Middle	0710.12	Moderate		

Total Assessment Area Count = 59

Wright County: Code 171

Census Tract Code	Income Level	Census Tract Code	Income Level	Census Tract Code	Income Level
1001.01	Middle	1004.01	Middle	1007.07	Middle
1001.02	Middle	1004.02	Moderate	1008.03	Middle
1002.02	Middle	1005.00	Middle	1008.04	Middle
1002.03	Moderate	1007.01	Middle	1008.05	Upper
1002.05	Middle	1007.04	Middle	1008.06	Upper
1002.06	Middle	1007.05	Middle	1008.07	Middle
1003.00	Middle	1007.06	Middle	1009.00	Middle

Total Assessment Area Count = 21

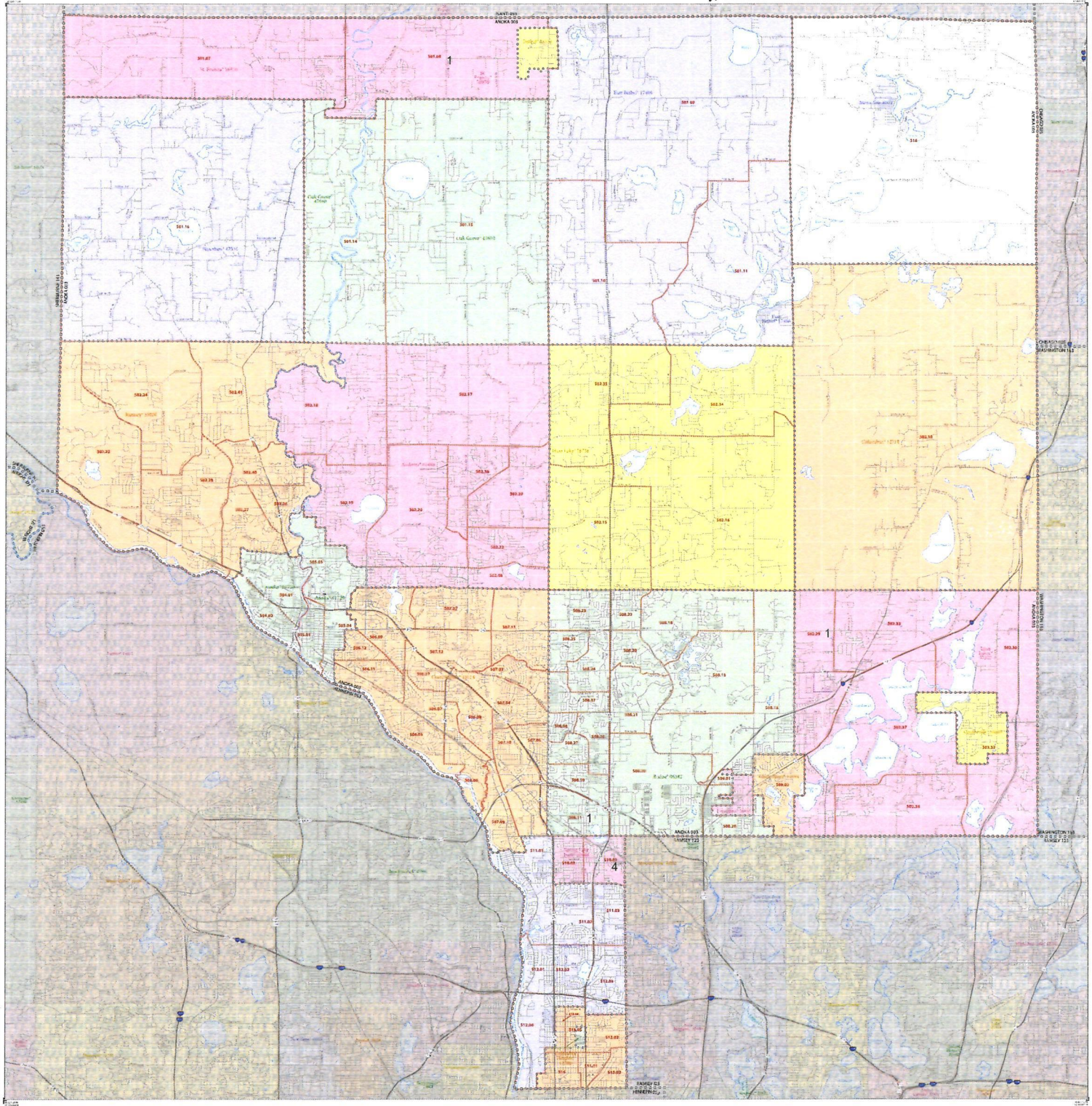
**CRA for Loans \$1MM or Less
Originated/Renewed 12/31/25**

	Number of Loans	Max Credit or Orig/Renew Amt
Low Income:	0	\$0.00
Moderate Income:	92	\$9,395,399.00
Middle Income:	56	\$12,321,068.87
Upper Income:	16	\$3,733,532.50
Unknown Income:	<u>1</u>	<u>\$100,000.00</u>
Totals In CRA Area:	165	\$25,550,000.37
Totals Outside CRA Area:	<u>36</u>	<u>\$13,922,406.81</u>
Totals for 2025	201	\$39,472,407.18
Percentage In CRA Area:	82%	65%
Percentage Outside CRA Area:	18%	35%

CT Income Level Color Key:

Low Income	
Moderate Income	
Middle Income	
Upper Income	
Unknown Income	

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Anoka County, MN Complete County



SYMBOL DESCRIPTION		SYMBOL	LABEL/STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL/STYLE
International Boundary	-----	CANADA	International	County Boundary	-----	County
Unincorporated Area	UNINCORPORATED	Unincorporated Area	City/County Boundary	-----	City/County
US Route	-----	US ROUTE	US Route	City Boundary	-----	City
State Route	-----	STATE ROUTE	State Route	City Boundary	-----	City
County Road	-----	COUNTY ROAD	County Road	City Boundary	-----	City
Local Road	-----	LOCAL ROAD	Local Road	City Boundary	-----	City
Water	Blue	WATER	Water	City Boundary	-----	City
Forest	Green	FOREST	Forest	City Boundary	-----	City
Urban	Yellow	URBAN	Urban	City Boundary	-----	City
Suburban	Orange	SUBURBAN	Suburban	City Boundary	-----	City
Rural	Pink	RURAL	Rural	City Boundary	-----	City

LEGEND

Where unincorporated areas are shown, the boundary between the city and the unincorporated area is shown. The boundary between the city and the unincorporated area is shown. The boundary between the city and the unincorporated area is shown.

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Map Title: 2020 Census - Census Tract Reference Map: Anoka County, MN Complete County. The map title is 2020 Census - Census Tract Reference Map: Anoka County, MN Complete County. The map title is 2020 Census - Census Tract Reference Map: Anoka County, MN Complete County.

PRODUCTS & SERVICES OFFERED

DEPOSITS

- Business and Consumer Checking Accounts
- Business and Consumer Savings Accounts
- Business and Consumer Certificate of Deposit

LOANS

▪ **COMMERCIAL LOANS**

Revolving credit lines, lines of credit for seasonal needs; term loans for equipment and/or machinery purchases; installment loans for vehicle purchases; accounts receivable and inventory financing; letters of credit; loans for commercial real estate purchases, refinancing, additions, and acquisitions, financing for investment and income properties; financing for nonprofit organizations. - Fees vary for each transaction. See a Commercial Loan Officer for details.

- Business Loans
- Business Lines of Credit
- Small Business Administration Loans (SBA) -7a and 504 Programs

▪ **REAL ESTATE LOANS**

Primary Home / Second Home
-Appraisal Fee and closing costs may apply. See a Consumer Lender for details.

- Home Equity Loans
- Home Equity Lines of Credit
- Mobile Home Loans

▪ **CONSUMER LOANS**

-Lien recording fees may apply. See a Consumer Lender for details.

- Automobile Loans
- Boat Loans
- Motorcycle Loans
- RV Loans
- Recreational Loans
- Personal Installment Loans
- QuikCredit (Overdraft Protection on Checking) -No Annual Fee. See a Consumer Lender for details.
- Single Pay Loans

IRA PRODUCTS

Certificate of Deposit/Money Market Savings Account

- Traditional
- Roth
- Education
- SEP (Simplified Employee Pension)
- HSA (Health Savings) Accounts

ONLINE BANKING SERVICES

- Bill Pay
- Debit Card Management
- E-Statements
- Mobile Banking
- Mobile Deposit
- Secure Alerts
- Zelle

OTHER PRODUCTS & SERVICES

- ATM Card
- Debit Cards
- Credit Cards
- Night Drop
- Prepaid Cards
- Savings Overdraft Transfer Protection
- teleSTAR 24-Hour Telephone Banking
- Wire Transfers
- Safe Deposit Box Rental (Not FDIC Insured)

CASH MANAGEMENT SERVICES

- ACH Origination
- Wire Transfers
- Remote Deposit Capture
- Business Mobile Deposit
- Sweep Services
- Merchant Services
- IntraFi CDARS & ICS

Non-Bank Investment Products

Offered through Cetera Investment Services LLC.
-Not FDIC, may lose value, not financial institution guaranteed, not a deposit, Not insured by any federal government agency/ NCUSIF insured.

www.northstarbank.com

www.northstarbank.com

*Deposit Accounts opened in-person, online account opening through our website, or with signature validation software. For Deposit Account descriptions on Business Checking, Business Savings, Personal Checking, Personal Savings, Certificates, and IRA Options, refer to our website, and/or Retail Banking staff for more information.

** North Star Bank Cash Management Services & Related Fees on the next page.

***Disclosures on the following pages: Schedule of Fees.



CASH MANAGEMENT SERVICES & RELATED FEES

Contact Cash Management regarding this product offering.

BUSINESS ONLINE BANKING

Agreement required.

No fee for online access

ACH ORIGATION SERVICES (ACH MANAGER)

Agreement required. Limits established.

Full ACH Origination (PPD, CCD, CTX)

\$19.95 per month

Limited ACH Origination (CTX only)

\$9.95 per month

Originate following payment types: payroll, accounts payable, accounts receivable, and company transfers online.

\$0.15 per debit or credit transactions

WIRE TRANSFER ORIGATION (WIRE MANAGER)

Agreement required.

\$20.00 Domestic Wire

Submit wire transfer requests online.

\$50.00 International Wire

\$15.00 Incoming Wire

REMOTE DEPOSIT CAPTURE

Agreement required. Scanner required.

\$40.00 per month

Limits established.

No set up fee

Submit deposits online from your business location.

Scanner expense varies depending on single-feed or multi-feed scanner

BUSINESS MOBILE DEPOSIT

Agreement required. Limits established.

No fee for access to service

Use your mobile device to make deposits.

Per item fees based on account type

SWEEP SERVICES

Agreement Required. Daily sweeps available.

Zero Balance Sweep

\$25.00 per month per account

Commercial LOC Sweep (1 or 2 way)

\$50.00 per month per account

Commercial LOC OD Sweep

\$10.00 per advance

MERCHANT SERVICES

Merchant card processing options available. Merchant card services partner uses Clover.

BUSINESS CREDIT CARDS

Business credit cards offered through Elan Financial Services. Contact our new accounts staff to assist.

January 2024

Member FDIC

SCHEDULE OF FEES

ACCOUNT FEES:

Account Closing Fee.....	\$50.00 during first 6 months
Deluxe Check Charges	Printed checks - prices vary by design
Dormant Account Fee.....	\$5.00 one-time fee (no activity in a checking or savings account for 36 months)
MICR Rejection Fee.....	\$0.50 per check due to bad MICR line
Savings Overdraft Protection Agreement (transfer fee)	\$5.00 Per automatic transfers from savings to checking for Overdraft Protection
Continuous Overdraft Charge.....	After 7 calendar day's grace \$5.00 each processing day that account remains overdrawn. Sat, Sun, and federal legal holidays are non-processing days. Fee applies to overdrafts created by check, in person withdrawals, electronic withdrawals except ATM and one-time debit card withdrawals, and monthly service charges or other account fees.
Paid Overdrafted Item(s) Fee	\$32.00 Per debit item that overdraws the account balance (maximum of \$160.00 per day for consumers and no maximum per day for businesses). Applies to overdrafts created by check, in person withdrawals, and electronic withdrawals except ATM and one-time debit card withdrawals, and monthly service charges or other account fees. You will not be charged this fee each time the same transaction is represented against insufficient funds.
Returned Overdrafted Item(s) Fee	\$32.00 Per debit item that overdraws the account balance (maximum of \$160.00 per day for consumers and no maximum per day for businesses). Applies to overdrafts created by check, in person withdrawals, and electronic withdrawals except ATM and one-time debit card withdrawals, and monthly service charges or other account fees. You will not be charged this fee each time the same transaction is represented against insufficient funds.
Returned Deposited Item.....	\$5.00 per item
Represented Deposit Item	We Do Not Charge For This (Applies to checks or electronic deposits)
Returned Mail Handling Fee	\$5.00 per month until abandoned
Stop Payment Charge	\$30.00 per item per 6 month period
IRA Closing Fee	\$40.00 per plan
HSA Set Up Fee.....	\$25.00 per HSA account
Telephone Transfer Fee.....	\$2.00 per transfer request - if telephone call is made directly to bank staff

TELLER COUNTER SERVICES:

Check Cashing Fee.....	\$10.00 for checks over \$100.00 (Applies to checks drawn on North Star Bank accounts payable to noncustomers)
Coin Counting	No charge for customers, 10% of total for non-customers
Cashier's Checks	\$5.00 per check
Money Order.....	\$3.00 per item
Lost Monetary Instrument Fee.....	\$25.00 per item
Counter Checks/Deposit Tickets.....	5 Free, then \$1.00 each thereafter
Foreign Currency Purchase/Sell	\$30.00 per order/request (additional delivery fees may apply)
Collection Item-Canadian	\$10.00 per item
Deposit Bags Locked (Key Fee).....	2 keys Free, \$10.00 per additional key
Deposit Bags-Locked	\$25.00 per bag
Deposit Bags-Zippered.....	\$5.00 per bag
Deposit Bags-Disposable	\$2.50 for 10 bags
Night Drop Access Key Replacement.....	\$5.00 per key
VISA Gift Card.....	\$5.00 per card
Reload Card Fee	\$2.00 per reload
Travel Reloadable Card w/EMV Chip.....	\$9.00 per card
General Purpose Reloadable Card	\$7.00 per card

WIRE TRANSFERS FEES:

Wire Transfer-Domestic Outgoing	\$20.00 per wire
Wire Transfer-Intl Outgoing	\$50.00 per wire
Wire Transfer Incoming	\$15.00 per wire

ELECTRONIC BANKING FEES:

ATM/POS Replacement Card	\$5.00 per card
Fee for ATM Withdrawal	\$2.50 Fee applies to ATM cash withdrawals at machines not owned by us
eSTAR Online Banking	No charge
For online banking transfers between accounts and basic bill payment services (fees apply to some bill payment features)	
Bill Pay Fee.....	No charge
For basic bill payment services (fees apply to some bill payment features)	
P2P (Zelle) Transfer Fee	No charge
Transfer Now - Transfer funds between your account(s) maintained with us and your account(s) maintained by other financial institutions.	
Transfer Now - Standard Delivery.....	Free
Transfer Now - Next Day Delivery	\$3.00
Same Day Bill Payment.....	\$9.95
For each same day online banking bill payment instruction you make to your authorized biller.	
Overnight Bill Payment Check Fee.....	\$14.95
For each overnight check online banking bill payment instruction you initiate to pay your authorized biller. MasterCard	
Currency Conversion Fee; MasterCard Cross Border Fee: If you withdraw cash with your ATM card at ATMs located outside the U.S. or make purchases with your debit card from merchants located outside the U.S., you will be charged a MasterCard Cross Border Fee for the transaction amount; and, if there is a currency conversion, you will be charged a MasterCard Currency Conversion Fee for the transaction amount.	

SAFE DEPOSIT BOXES (Not FDIC Insured):

3 x 5 x 22	\$35.00
5 x 5 x 22	\$45.00
3 x 10 x 22	\$55.00
5 x 10 x 22	\$80.00
10 x 10 x 22	\$140.00
10 x 15 x 22	\$190.00
Lost Key.....	\$35.00
Both Keys Lost.....	Market Rate (Lock Drilled)

BUSINESS SERVICES:

ACH & Positive Pay Alerts	varies
Analysis Statement.....	\$5.00 per month
Audit Confirmation Fee.....	\$25.00 per request
eCorp ACH Origination	\$19.95 per month plus \$0.15 per item
eCorp Online Banking	Free
eCorp Wire Manager.....	Free
Image Statement	\$2.00 per month
Images on CD.....	\$25.00
Remote Deposit Implementation Fee	varies
Remote Deposit-Scanner Purchase	varies
Remote Deposit Service Fee	varies

OTHER MISCELLANEOUS FEES:

Account Transcript Statement-Current Activity.....	\$2.00
Account Prior Statement Copy	\$5.00 per month
Account Reconciliation Fee.....	\$35.00 per hour; 1/2 hr minimum
Research Fee.....	\$35.00 per hour, \$2.00 per copy
Image Statement-nonstandard.....	\$5.00 per month
Escheatment Fee	\$100.00
Garnishment & Levies	\$100.00
Notary Service.....	No charge for customers, \$1.00 for non customer
Photocopies	\$2.00 per photocopy
Fax Fee	\$1.00 Per Page
Signature Guarantee	No charge (customers only)
Special Handling Statement/Notice	\$5.00 per month/per instructions
Loan Amortization Schedule	\$10.00 per schedule

PUBLIC DISCLOSURE

April 10, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North Star Bank
Certificate Number: 16733

1820 Lexington Avenue N
Roseville, Minnesota 55113

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Kansas City Regional Office

1100 Walnut St, Suite 2100
Kansas City, Missouri 64106

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, nor should it 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

North Star Bank's Community Reinvestment Act (CRA) performance under the applicable performance criteria supports the overall rating. The following points summarize the bank's performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of the small business loans reviewed were located inside the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects poor penetration among businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

DESCRIPTION OF INSTITUTION

North Star Bank is a privately owned financial institution chartered in Roseville, Minnesota. In addition to its main office in Roseville, the bank operates one full-service branch in White Bear Lake, Minnesota. In March 2023, North Star Bank opened a loan production office in Monticello, Minnesota and added a deposit-taking interactive teller machine (ITM) at this location. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation dated April 5, 2021, based on Interagency Small Institution Examination Procedures.

North Star Bank offers a wide range of loan products, including commercial, home mortgage, and consumer loans. North Star Bank's business focus continues to be commercial lending. Home mortgage and consumer loans are offered; however, to a much lesser degree. The bank also offers commercial loans through the Small Business Administration.

The institution provides a variety of deposit services including checking, savings, health savings accounts, individual retirement accounts, and certificates of deposit. In addition to traditional banking services, customers have access to ATMs, one ITM, online banking, including electronic bill pay and periodic statements, and mobile banking, including mobile deposit. The bank also offers investment advisory services through a nonaffiliated entity.

As of December 31, 2023, assets totaled approximately \$352,077,000, loans totaled \$248,328,000, and deposits totaled \$321,650,000. The bank's loan portfolio distribution is illustrated in the following table.

Loan Portfolio Distribution as of December 31, 2023		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	15,488	6.2
Secured by Farmland	371	0.1
Secured by 1-4 Family Residential Properties	22,519	9.1
Secured by Multifamily (5 or more) Residential Properties	16,925	6.8
Secured by Nonfarm Nonresidential Properties	109,884	44.3
Total Real Estate Loans	165,187	66.5
Commercial and Industrial Loans	70,880	28.5
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	3,122	1.3
Other Loans	9,228	3.7
Less: Unearned Income	(89)	(0.0)
Total Loans	248,328	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet its assessment area's credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires financial institutions to define one or more assessment areas within which its CRA performance will be evaluated. North Star Bank designated a single contiguous assessment area in south central Minnesota that includes the following counties in their entirety: Anoka, Ramsey, and Washington. Additionally, the assessment area includes the following partial counties: Dakota, Hennepin, Sherburne, and Wright. All of these counties are part of the Minneapolis-St. Paul-Bloomington, Minnesota-Wisconsin Metropolitan Statistical Area (MSA).

Since the prior evaluation, bank management expanded the assessment area to include all census tracts in Anoka, Ramsey, and Washington counties, as it had previously included only selected census tracts within these counties. Bank management also expanded the assessment area by including additional census tracts in both Hennepin and Dakota counties. Lastly, bank management expanded the assessment area to include portions of Wright and Sherburne counties, which had not previously been included. While North Star Bank has not made any changes to branches, the expanded assessment area includes the bank's new deposit-taking ITM in Monticello, Minnesota, which is located in a moderate-income census tract in Wright County. North Star Bank's branches in Roseville and White Bear Lake are located in middle-income census tracts in Ramsey County.

Economic and Demographic Data

According to 2020 U.S. Census data, the assessment area is comprised of 49 low-income, 170 moderate-income, 304 middle-income, and 187 upper-income census tracts. Further, there are 11 census tracts without income designations. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	721	6.8	23.6	42.2	25.9	1.5
Population by Geography	2,910,759	6.3	22.4	43.5	27.0	1.0
Housing Units by Geography	1,161,048	5.9	22.6	44.2	26.7	0.7
Owner-Occupied Units by Geography	751,463	2.8	18.6	47.8	30.7	0.1
Occupied Rental Units by Geography	359,731	11.8	30.8	37.0	18.4	2.0
Vacant Units by Geography	49,854	8.7	23.5	41.2	25.5	1.2
Businesses by Geography	339,314	4.6	19.4	41.9	33.1	0.9
Farms by Geography	6,787	2.5	16.5	47.7	33.1	0.3
Family Distribution by Income Level	686,195	20.5	18.3	22.7	38.5	0.0
Household Distribution by Income Level	1,111,194	23.9	17.2	19.0	39.9	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul- Bloomington, MN-WI MSA		\$103,977	Median Housing Value			\$280,823
			Median Gross Rent			\$1,165
			Families Below Poverty Level			5.6%
<i>Source: 2020 U.S. Census and 2023 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.</i>						

According to 2023 D&B data, service industries represent the largest portion of business operations at 39.5 percent; followed by non-classifiable establishments at 19.9 percent; and finance, insurance, and real estate at 11.8 percent. Additionally, 65.2 percent of assessment area businesses have four or fewer employees, and 92.5 percent operate from a single location.

Competition

The assessment area is a highly competitive market for credit products and financial services. According to Consolidated Reports of Condition and Income (Reports of Condition) data filed by financial institutions, there are 153 financial institutions operating 580 locations within the assessment area. These institutions range from small community banks to larger national financial institutions. North Star Bank ranked 46th with 0.1 percent of the deposit market share.

North Star Bank is not required to collect or report small business CRA loan data and has elected not to do so. Therefore, examiners did not compare the bank's small business lending performance to aggregate CRA data within this evaluation. However, the aggregate CRA data provides an indication of the level of demand for small business loans and the level of competition within the assessment area. According to 2022 aggregate CRA data (most recent available), 165 CRA data reporters collectively reported 71,012 small business loans originated within the counties in the assessment area. These figures do not include the number of loans originated by smaller institutions that are not required to report small business lending data but operate within the assessment area.

The overall volume of small business lending in the assessment area reflects a highly competitive market.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available. For this evaluation, examiners reviewed a recently conducted community contact discussion with a representative of a local economic development agency within the assessment area.

The contact stated that some local businesses are experiencing labor shortages and retention issues as the majority of residents commute outside the county for employment. As a result, the area is focusing on workforce development in an effort to encourage residents to find employment within the county. The contact also noted that there are record numbers of market rate single-family homes being built in the larger communities; however, there is a continuing need for affordable housing in nearly all communities within the area. Furthermore, a low vacancy rate and a low turnover of existing housing stock has made it difficult for lower income families to find housing. Overall, the contact stated there were a large number of banks in the area, and felt that housing development loans were the primary credit need of the community; however, both home mortgage and small business loans are always needed. The contact added that all area financial institutions are receptive to the credit needs and was not aware of any unmet needs.

Credit Needs

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that small business and home mortgage loans represent the primary credit needs of the assessment area.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated April 5, 2021, to the current evaluation dated April 10, 2024. Examiners used Interagency Small Institution Examination Procedures to evaluate North Star Bank's CRA performance. These procedures focus on the bank's performance under the Lending Test as outlined in the Small Bank Performance Criteria Appendix.

Activities Reviewed

Examiners determined that the bank's major product line is commercial loans. This conclusion considered discussions with management regarding the bank's business strategy, review of bank records of the number and dollar volume of loans originated during the evaluation period, and a review of the Report of Condition. For this evaluation, examiners focused solely on the bank's small business lending to derive overall conclusions. Examiners did not review home mortgage or small farm lending activities because they each represent a small portion of the loan portfolio, are not a business focus of the institution, and provide no material support for conclusions.

Bank records indicate that the lending focus and product mix remained generally consistent throughout the evaluation period. Therefore, examiners reviewed all small business loans

originated, purchased, or renewed in 2023, as this period was considered representative of the bank's performance during the entire evaluation period. According to bank data, the small business loan universe during this period included 113 loans totaling \$38.3 million. Examiners considered the entire universe of 113 small business loans when analyzing the bank's performance for the Assessment Area Concentration criterion. Examiners then reviewed all the loans located within the assessment area when evaluating the Geographic Distribution criterion (93 loans totaling \$31.5 million) and chose a sample based on the total number of loans located within the assessment area to analyze the Borrower Profile criterion (47 loans totaling \$17.3 million). D&B data for 2023 provided a standard of comparison for the bank's small business lending performance.

While the evaluation considered the number and dollar volume of loans reviewed, examiners emphasized performance by number of loans because it is a better indicator of the number of businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

North Star Bank demonstrated satisfactory performance under the Lending Test. The bank's performance under the loan-to-deposit ratio, assessment area concentration, and geographic distribution criterion supports this conclusion.

Loan-to-Deposit Ratio

The average net loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's net loan-to-deposit ratio, calculated from Reports of Condition data, averaged 71.5 percent over the past 11 calendar quarters from June 30, 2021, to December 31, 2023. The ratio ranged from a low of 68.4 percent as of June 30, 2021, to its current high of 76.3 percent as of December 31, 2023. As illustrated in the following table, North Star Bank's average net loan-to-deposit ratio reasonably compares to most of the comparable institutions. North Star Bank's net loan-to-deposit ratio has been trending upward since the previous CRA evaluation. Examiners selected comparable institutions based on their asset size, lending focus, and geographic location.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 12/31/23 \$(000s)	Average Net LTD Ratio (%)
BankCherokee Saint Paul, MN	375,627	60.5
Citizens Independent Bank Saint Louis Park, MN	344,578	63.8
Crown Bank Edina, MN	382,495	94.3
Gateway Bank Mendota Heights, MN	271,713	73.6
North Star Bank Roseville, MN	352,077	71.5
Village Bank Saint Francis, MN	410,440	62.9
<i>Source: Reports of Condition 6/30/2021 through 12/31/2023</i>		

Assessment Area Concentration

North Star Bank originated a majority of small business loans within the assessment area as shown in the following table.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans					Dollar Amount of Loans \$(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	93	82.3	20	17.7	113	31,528	82.4	6,744	17.6	38,272
<i>Source: 2023 Bank records</i>										

Geographic Distribution

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Examiners focused on the percentage of lending by number of loans in low- and moderate-income census tracts within the assessment area.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The following table shows the bank's lending in both low- and moderate-income geographies reasonably compares to demographic data.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	4.7	4	4.3	860	2.7
Moderate	19.4	18	19.4	4,917	15.6
Middle	41.9	57	61.3	20,222	64.2
Upper	33.1	14	15.0	5,529	17.5
Not Available	0.9	0	0.0	0	0.0
Totals	100.0	93	100.0	31,528	100.0

Source: 2023 D&B Data; 2023 Bank Data

Borrower Profile

The bank's lending performance demonstrates poor penetration among businesses of different revenue sizes. Examiners focused on the percentage of lending to businesses with gross annual revenues of \$1 million or less.

Small Business Loans

The distribution of small business loans reflects poor lending penetration to businesses with gross annual revenues of \$1 million or less. As illustrated in the following table, the bank's lending performance to businesses with gross annual revenues of \$1 million or less is significantly lower than demographic data. While North Star Bank was an active Small Business Administration lender, there was minimal activity during the evaluation period. Additionally, management indicated the bank has a long history and maintains a more mature commercial customer base, which includes businesses with higher revenues. North Star Bank engages in limited advertising that mainly includes advertisements in local community publications for general brand awareness.

Although these factors provide some context for the low level of lending among businesses with gross annual revenues of \$1 million or less, the overall distribution of small business loans reflects poor penetration among businesses of different revenue sizes given it significantly lags demographic data.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	88.9	21	44.7	5,962	34.5
>1,000,000	3.9	26	55.3	11,308	65.5
Revenue Not Available	7.2	0	0.0	0	0.0
Totals	100.0	47	100.0	17,269	100.0

Source: 2023 D&B Data; 2023 Bank Data

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is 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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

Rated Area: A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.