Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

August 17, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Think Mutual Bank
Charter Number: 718037

5200 Members Parkway NW
Rochester, MN 55903

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

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

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

Performance Levels	Think Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
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:

- Think's Lending Test performance is good based on the performance in Minnesota.
- Think's Investment Test performance is adequate based on the performance in Minnesota.
- Think's Service Test performance is good based on the performance in Minnesota.

Lending in Assessment Area

A high percentage of the bank's loans are in its assessment areas (AAs). The bank originated and purchased 70.30 percent of its total loans by number inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table 1: Lending Inside and Outside of the Assessment Area **2022-2024**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	1,797	72.26	690	27.74	2,487	411,752	73.77	146,418	26.23	558,170
Small Business	470	79.39	122	20.61	592	34,252	82.37	7,332	17.63	41,584
Small Farm	0	0.00	0	0.00	0	0	0.00	0	0.00	0
Consumer	7,827	69.39	3,453	30.61	11,280	142,590	64.53	78,363	35.47	220,953
Total	**10,094**	**70.30**	**4,265**	**29.70**	**14,359**	**588,594**	**71.72**	**232,113**	**28.28**	**820,707**

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Think is a single-state mutual thrift headquartered in Rochester, Minnesota. Think is a full-service financial institution offering traditional banking services to consumers and businesses. As of December 31, 2024, Think operated eight full-service locations in Minnesota. Think did not own or operate any deposit-taking automated teller machines (ATMs). Think did not open or close any branches during the evaluation period. Refer to the Description of Operations in the state section for information regarding the branches by rating area and AA. For the purposes of this examination, Think operated in two AAs across one rating area. AAs included the Rochester Metropolitan Statistical Area (MSA) and the Minneapolis MSA. Minnesota was the only rating area.

As of December 31, 2024, Think had $2.05 billion in total assets and total loans comprised 59.80 percent of assets. The leverage capital ratio was 16.75 percent with $350.68 million in tier one capital.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. Think's CRA performance was rated Satisfactory in the prior Performance Evaluation dated July 10, 2023.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated businesses loans, home mortgage loans, consumer loans, community development (CD) loans, qualified investments, and CD and retail services from January 1, 2022, through December 31, 2024 (the evaluation period). Examiners did not analyze farm loans given the bank did not originate or purchase any of these loans during the evaluation period.

Lending Test
Examiners used home mortgage loan data reported by Think in their 2022-2024 Home Mortgage Disclosure Act (HMDA) loan application registers (LAR) and small loans to businesses and consumer loan data reported in the bank's 2022-2024 CRA LAR. In preparation for this evaluation, examiners completed a separate data integrity review and confirmed the data was accurate and reliable.

Examiners gave equal weight to geographic and borrower distribution components of the Lending Test. The Lending Test also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex or responsive to AA needs.

Investment Test
Examiners reviewed the bank's donations, grants, and investments made during the evaluation period and determined which qualified as CD.

Service Test
Examiners reviewed the bank's listing of service activities provided during the evaluation period and determined which qualified as CD. Examiners also considered retail and alternative delivery systems, including branch hours and services and branch distribution by geography.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is based entirely on the state of Minnesota given it is the bank's only rating area. The state rating is based on performance in the Rochester MSA and the Minneapolis MSA. Rating area weight was determined based on the bank's deposit volume, branch presence, and loan volume in each rating area. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national bank's 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 has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Think exhibits a good distribution of loans throughout geographies of different income levels.
- The bank exhibits an excellent distribution of loans to borrowers of different income levels and businesses of different sizes.
- Lending levels reflect excellent responsiveness to credit needs in the AA.
- Think made a low level of CD loans.
- The bank had an adequate level of qualified CD investments and donations.
- Think's service delivery systems are accessible to geographies and individuals of different income levels.
- Think employees provided a relatively high level of CD services to qualified organizations.

Description of Institution's Operations in Minnesota

The bank had two AAs in the state of Minnesota: Rochester MSA and Minneapolis MSA. Performance in the Rochester MSA was evaluated using two separate analysis periods, 2022-23 and 2024, given AA delineation changes. Performance in the Minneapolis MSA was evaluated using a single analysis period of 2022-2024.

Rochester MSA
For the 2022-2023 analysis period, the Rochester MSA consisted of Dodge and Olmsted counties and portions of Fillmore, Goodhue, Mower, and Wabasha counties. The AA includes three CTs in southern Goodhue County and two CTs in northern Mower County. Goodhue and Mower counties are in the non-MSA portion of Minnesota, outside the Rochester MSA. The addition of the five CTs from the non-MSA does not substantially extend beyond an MSA boundary and the AA is legal. It is reasonable to include these CTs given the proximity to the bank's branches.

For the 2024 analysis period, the Rochester MSA consisted of Dodge, Fillmore, Olmsted, and Wabasha counties. For both the 2022-2023 and 2024 analysis periods, Think operated five full-service branches within the AA. All five branches were in Rochester.

For both the 2022-2023 and 2024 analysis periods, Think's primary lending focus in the Rochester MSA was consumer and home mortgage loans. For the 2022-2023 analysis period, consumer loans accounted for 78.69 percent of loans by number and 24.76 percent of loans by dollar. Home mortgage loans accounted for 17.46 percent of loans by number and 69.98 percent of loans by dollar. Business loans represented 3.85 percent and 5.26 percent of loans by number and dollar, respectively. For the 2024 analysis period, consumer loans accounted for 75.27 percent of loans by number and 18.96 percent of loans by dollar. Home mortgage loans accounted for 20.37 percent of loans by number and 75.98 percent of loans by dollar. Business loans represented 4.36 percent and 5.06 percent of loans by number and dollar, respectively.

The 2023 FDIC Deposit Market Share Report indicated Think ranked first among 41 deposit-taking institutions in the AA, with a market share of 16.09 percent. The top five competitors by market share were Think, Wells Fargo Bank, Home Federal Savings Bank, U.S. Bank, and Merchants Bank, with a combined market share of 49.99 percent. The 2024 FDIC Deposit Market Share Report indicated Think ranked first among 34 deposit-taking institutions in the AA, with a market share of 20.09 percent. The top five competitors by market share were Think, Wells Fargo Bank, Home Federal Savings Bank, U.S. Bank, and Merchants Bank, with a combined market share of 55.11 percent.

As part of this review, examiners contacted an executive director of a Rochester affordable housing foundation to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the Rochester MSA. The contact noted while economically Rochester is doing very well, the housing supply is lagging in comparison to the new jobs and workers needed in the community. The contact noted opportunities for financial institutions to provide downpayment and closing cost assistance programs. Additionally, the contact identified the need for financial education for households renting and purchasing homes.

Examiners also referenced recently completed community contacts. One contact worked for an economic development authority in Fillmore County. The contact stated businesses are doing well but finding labor is a challenge given low unemployment, especially in smaller communities because people often commute to Rochester for employment. Additionally, the area has an aging population. The contact stated housing shortages exist in the area for single family homes and apartments. Many homes in the county are older and in need of repair or upgrades. The contact noted there are opportunities for financial institutions to work with the county and cities for revolving loan funds for economic development. Another contact worked for an economic development corporation in Rochester. The contact identified affordable housing and minority-owned business financing as primary credit needs within the AA. The contact additionally identified the need for a community development financial institution (CDFI) focused on the Rochester MSA.

The tables on the following page provide information on the demographic composition of the Rochester MSA for each analysis period.

Assessment Area - Rochester MSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	51	3.92	17.65	49.02	29.41	0.00
Population by Geography	226,298	4.65	14.07	46.41	34.88	0.00
Housing Units by Geography	94,019	4.34	16.52	46.63	32.52	0.00
Owner-Occupied Housing by Geography	66,527	2.66	11.80	49.53	36.02	0.00
Occupied Rental Units by Geography	22,555	8.27	28.29	38.29	25.15	0.00
Vacant Units by Geography	4,937	8.93	26.33	45.70	19.04	0.00
Businesses by Geography	7,861	2.67	18.69	45.85	32.79	0.00
Farms by Geography	815	0.61	6.75	68.10	24.54	0.00
Family Distribution by Income Level	58,790	17.18	18.20	23.06	41.55	0.00
Household Distribution by Income Level	89,082	21.00	16.59	19.36	43.05	0.00
Unemployment rate (%)	3.28	5.93	4.80	3.20	2.42	0.00
Households Below Poverty Level (%)	7.86	14.22	16.02	6.78	4.69	0.00
Median Family Income (40340 - Rochester, MN MSA)		$94,698			Median Housing Value	$209,700
Median Family Income (Non-MSAs - MN)		$74,737			Median Gross Rent	$894
Median Family Income (40340 - Rochester, MN MSA) for 2023		$116,100			Families Below Poverty Level	4.53
Median Family Income (Non-MSAs - MN) for 2023		$90,400				
FFIEC File - 2020 Census						
2023 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						

Assessment Area - Rochester MSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	52	3.85	23.08	48.08	25.00	0.00
Population by Geography	226,329	4.65	18.07	46.97	30.32	0.00
Housing Units by Geography	95,255	4.28	21.31	47.11	27.30	0.00
Owner-Occupied Housing by Geography	66,771	2.65	16.35	49.90	31.09	0.00
Occupied Rental Units by Geography	22,299	8.37	32.67	38.84	20.12	0.00
Vacant Units by Geography	6,185	7.13	33.81	46.82	12.24	0.00
Businesses by Geography	8,544	2.75	24.47	47.00	25.77	0.00
Farms by Geography	817	0.49	18.48	65.73	15.30	0.00
Family Distribution by Income Level	58,682	18.40	18.94	23.36	39.30	0.00
Household Distribution by Income Level	89,070	22.10	17.21	19.65	41.04	0.00
Unemployment rate (%)	3.25	5.93	4.61	3.18	2.18	0.00
Households Below Poverty Level (%)	7.84	14.22	14.85	6.66	3.83	0.00
Median Family Income (40340 - Rochester, MN MSA)		$94,698			Median Housing Value	$207,300
Median Family Income (40340 - Rochester, MN MSA) for 2024		$112,700			Median Gross Rent	$892
					Families Below Poverty Level	4.66
FFIEC File - 2024 Census						
2024 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						

Minneapolis MSA

The Minneapolis MSA consisted of Dakota and Hennepin counties in Minnesota. Think operated three full-service branches within the AA. The branches were in Apple Valley, Eagan, and Edina.

Think's primary lending focus in the Minneapolis MSA was consumer and home mortgage loans. Consumer loans accounted for 77.03 percent of loans by number and 28.58 percent of loans by dollar. Home mortgage loans accounted for 16.21 percent of loans by number and 63.43 percent of loans by

number. Business loans represented 6.76 percent and 7.99 percent of loans by number and dollar, respectively.

The 2024 FDIC Deposit Market Share Report indicated Think Bank ranked 28th among 83 deposit-taking institutions in the AA, with a market share of 0.18 percent. The top five competitors by market share were U.S. Bank, Wells Fargo Bank, Ameriprise Bank, BMO Bank, and Bank of America, with a combined market share of 76.01 percent.

As part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the Minneapolis MSA. One contact interaction involved participants from five organizations that support affordable housing in the Minneapolis-St. Paul area. Another contact worked for a CDFI in Minneapolis. Both contacts identified a shortage of affordable homes and rentals and a need for downpayment assistance programs. One contact also identified small business lending as a primary credit need of the area.

The following table provides information on the demographic composition of the Minneapolis MSA.

Assessment Area - Minneapolis MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	435	5.98	20.00	38.85	33.33	1.84
Population by Geography	1,721,447	5.47	18.60	38.67	35.74	1.53
Housing Units by Geography	707,475	5.05	19.05	39.66	35.02	1.21
Owner-Occupied Housing by Geography	444,064	2.15	14.29	41.93	41.46	0.16
Occupied Rental Units by Geography	233,291	10.23	27.77	35.97	22.93	3.11
Vacant Units by Geography	30,120	7.70	21.84	34.73	33.79	1.94
Businesses by Geography	87,702	3.93	16.91	37.31	40.30	1.55
Farms by Geography	2,089	2.01	14.94	41.07	41.60	0.38
Family Distribution by Income Level	407,058	19.18	17.21	21.34	42.27	0.00
Household Distribution by Income Level	677,355	23.70	16.41	18.18	41.72	0.00
Unemployment rate (%)	3.85	8.63	5.57	3.50	2.59	6.21
Households Below Poverty Level (%)	8.72	31.39	13.20	6.47	4.81	34.48
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)		$103,977			Median Housing Value	$271,700
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2024		$123,700			Median Gross Rent	$1,212
					Families Below Poverty Level	5.23

FFIEC File - 2024 Census
2024 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 Minnesota

The rating for the state of Minnesota is based on the performance in the Rochester MSA and Minneapolis MSA. Examiners selected both AAs for full-scope reviews. The Rochester MSA represented the largest portion of the bank's branches, deposits, and loan volume within the state. For those reasons, the Rochester MSA carried the most weight in determining the state rating. The Rochester MSA consisted of 66.67 percent of the branches, 85.19 percent of deposits, and 76.28 percent of loans

by number in the state. The Minneapolis MSA consisted of 33.33 percent of branches, 14.81 percent of deposits, and 23.72 percent of loans by number in the state.

Within the Rochester MSA, examiners analyzed home mortgage loans, small loans to businesses, and consumer loans to arrive at Lending Test conclusions. The 2022-2023 analysis period received more weight than the 2024 analysis period due to lending volume. For both analysis periods, consumer loans represented the largest proportion by number; therefore, consumer loans received the most weight when determining Lending Test conclusion. Home mortgage loans represented the next largest proportion of lending by number, followed by business loans.

Within the Minneapolis MSA, examiners analyzed home mortgage loans, small loans to businesses, and consumer loans to arrive at Lending Test conclusions. Consumer loans represented the largest proportion by number; therefore, consumer loans received the most weight when determining Lending Test conclusion. Home mortgage loans represented the next largest proportion of lending by number, followed by business loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the Rochester MSA and Minneapolis MSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Table 3: Lending Activity **2022-2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Rochester MSA	1,409	308	0	2	5,983	7,702	76.26	85.19
Minneapolis MSA	388	162	0	3	1,844	2,397	23.74	14.81
Total	**1,797**	**470**	**0**	**5**	**7,827**	**10,099**	**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
Rochester MSA	329,666	23,894	0	1,650	105,598	460,808	76.71	85.19
Minneapolis MSA	82,086	10,358	0	10,500	36,992	139,936	23.29	14.81
Total	**411,752**	**34,252**	**0**	**12,150**	**142,590**	**600,744**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Rochester MSA

For the 2022-2023 and 2024 analysis periods, Think's lending activity is excellent. The bank originated a substantial volume of loans by number and dollar, as reflected in the Lending Activity table above. Think's lending market share in the Rochester MSA is excellent compared to its deposit share. The 2023 FDIC Deposit Market Share report indicated Think ranked first among 41 deposit-taking institutions, with a market share of 16.09 percent. The 2024 FDIC Deposit Market Share report indicated Think ranked first among 34 deposit-taking institutions, with a market share of 20.09 percent.

Home mortgage lending activity is excellent. Aggregate home mortgage loan data for 2023 indicated Think ranked first among 241 lenders, with a market share of 8.25 percent. Think's home mortgage lending share was lower than its deposit share; however, positive consideration was given to the bank's ranking as top mortgage lender in the AA. The top five lenders captured 33.30 percent of the market. Aggregate home mortgage loan data for 2024 indicated Think ranked first among 260 lenders, with a market share of 8.57 percent. Think's home mortgage lending share was lower than its deposit share; however, positive consideration was given to the bank's ranking as top mortgage lender in the AA. The top five lenders captured 29.72 percent of the market.

Business lending activity is good. Aggregate small business loan data for 2023 indicated Think ranked eighth among 69 lenders, with a market share of 2.45 percent. Think's business lending market share was significantly lower than its deposit share; however, positive consideration was given to performance given the bank was in the top 12 percent of business lenders in the AA. The top five lenders captured 72.10 percent of the market. Aggregate small business loan data for 2024 indicated Think ranked seventh among 75 lenders, with a market share of 2.72 percent. Think's business lending market share was significantly lower than its deposit share; however, positive consideration was given to performance given the bank was in the top ten percent of business lenders in the AA. The top five lenders captured 71.41 percent of the market.

Minneapolis MSA

Think's lending activity is excellent. The bank originated a significant volume of loans, as reflected in the Lending Activity table above. Think's lending market share in the Minneapolis MSA is excellent compared to its deposit share. The 2024 FDIC Deposit Market Share report indicated Think Bank ranked 28th among 83 deposit-taking institutions, with a market share of 0.18 percent.

Home mortgage lending activity is excellent. Aggregate home mortgage loan data for 2024 indicated Think ranked 68th among 581 lenders, with a market share of 0.28 percent. Think's home mortgage lending share exceeded its deposit share. The top five lenders captured 26.67 percent of the market.

Business lending activity is good. Aggregate small business loan data for 2024 indicated Think ranked 54th among 144 lenders, with a market share of 0.10 percent. Think's business lending market share was near its deposit share. Positive consideration was given to the bank's performance given the large volume of small business lenders in the AA. The top five business lenders represent 73.39 percent of the small business loan market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Rochester MSA
The geographic distribution of home mortgage loans in the Rochester MSA is good.

During the 2022-2023 analysis period, the bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied housing units located in low-income geographies and lower than the aggregate lending percentage. The bank's percentage of home mortgage loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied housing units in moderate-income geographies and lower than the aggregate lending percentage.

During the 2024 analysis period, the bank's percentage of home mortgage loans in low-income geographies significantly exceeded the percentage of owner-occupied units located in low-income geographies and the aggregate lending percentage. The bank's percentage of home mortgage loans in moderate-income geographies was lower than the percentage of owner-occupied units located in moderate-income geographies and the aggregate lending percentage in moderate-income geographies.

Minneapolis MSA
The geographic distribution of home mortgage loans in the Minneapolis MSA is poor.

The bank's percentage of home mortgage loans in low- and moderate-income (LMI) geographies was significantly lower than the percentage of owner-occupied units located in LMI geographies and the aggregate lending percentages.

Small Loans to Businesses

Refer to Table 9 in the state of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Rochester MSA
The geographic distribution of business loans in the Rochester MSA is adequate.

During the 2022-2023 analysis period, the bank's percentage of business loans in low-income geographies was somewhat lower than both the percentage of businesses located in low-income geographies and the aggregate lending percentage. The bank's percentage of business loans in moderate-income geographies was lower than both the percentage of businesses located in moderate-income geographies and the aggregate lending percentage.

During the 2024 analysis period, the bank's percentage of business loans in low-income geographies was near to both the percentage of businesses located in low-income geographies and the aggregate lending percentage. The bank's percentage of business loans in moderate-income geographies was

somewhat lower than the percentage of businesses located in moderate-income geographies and near to the aggregate lending percentage.

Minneapolis MSA
The geographic distribution of business loans in the Minneapolis MSA is adequate.

The bank's percentage of business loans in low-income geographies was lower than the percentage of businesses located in low-income geographies and the aggregate lending percentage. The bank made no loans in low-income geographies. Other banks operate in and near those low-income areas. The bank's percentage of business loans in moderate-income geographies was near to both the percentage of businesses located in moderate-income geographies and the aggregate lending percentage.

Consumer Loans

Refer to Table 13 in the state of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Rochester MSA
The geographic distribution of consumer loans in the Rochester MSA is good.

During the 2022-2023 analysis period, the bank's percentage of consumer loans in low-income geographies exceeded the percentage of households in low-income geographies. The bank's percentage of consumer loans in moderate-income geographies was somewhat lower than the percentage of households in moderate-income geographies.

During the 2024 analysis period, the bank's percentage of consumer loans in low-income geographies exceeded the percentage of households in low-income geographies. The bank's percentage of consumer loans in moderate-income geographies was somewhat lower than the percentage of households in moderate-income geographies.

Minneapolis MSA
The geographic distribution of consumer loans in the Minneapolis MSA is poor.

The bank's percentage of consumer loans in LMI geographies was lower than the percentage of households in LMI geographies.

Lending Gap Analysis

Maps and lending activity were reviewed to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified in the Rochester MSA and Minneapolis MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

Rochester MSA
The distribution of home mortgage loans among individuals of different income levels in the Rochester MSA is good.

During the 2022-2023 analysis period, the bank's percentage of home mortgage loans to low-income borrowers was significantly lower than the percentage of low-income families in the AA and lower than the aggregate lending percentage. Housing affordability limited lending opportunities for low-income families. Demographic data reported 17.18 percent of families were low-income and 4.53 percent of families were below poverty level in the AA. Low-income borrowers in the Rochester MSA earned less than $58 thousand annually. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was somewhat lower than the aggregate lending percentage.

During the 2024 analysis period, the percentage of home mortgage loans to low-income borrowers was significantly lower than the percentage of low-income families in the AA and somewhat lower than the aggregate lending percentage. Housing affordability limited lending opportunities for low-income families. Demographic data reported 18.40 percent of families were low-income and 4.66 percent of families were below poverty level in the AA. Low-income borrowers earned less than $56 thousand annually. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was somewhat lower than the aggregate lending percentage.

Minneapolis MSA
The distribution of home mortgage loans among individuals of different income levels in the Minneapolis MSA is adequate.

The percentage of home mortgage loans to low-income borrowers was significantly lower than both the percentage of low-income families in the AA and the aggregate lending percentage. Housing affordability limited lending opportunities for low-income families. Demographic data reported 19.18 percent of families were low-income and 5.23 percent of families were below poverty level in the AA. Low-income borrowers earned less than $62 thousand annually. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families in the AA and lower than the aggregate lending percentage.

Small Loans to Businesses

Refer to Table 10 in the state of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Rochester MSA
The distribution of loans to businesses of different sizes in the Rochester MSA is excellent.

During both the 2022-2023 and 2024 analysis periods, the bank's percentage of loans to small businesses was near to the percentage of small businesses within the AA and significantly exceeded the aggregate lending percentage.

Minneapolis MSA
The distribution of loans to businesses of different sizes in the Minneapolis MSA is adequate.

The bank's percentage of loans to small businesses was significantly lower than the percentage of small businesses within the AA and somewhat lower than the aggregate lending percentage.

Consumer Loans

Refer to Table 14 in the state of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Rochester MSA
The distribution of loans to consumers of different income levels in the Rochester MSA is excellent.

During both the 2022-2023 and 2024 analysis periods, the percentage of consumer loans to LMI borrowers significantly exceeded the percentage of LMI households in the AA.

Minneapolis MSA
The distribution of loans to consumers of different income levels in the Minneapolis MSA is excellent.

The percentage of consumer loans to LMI borrowers significantly exceeded the percentage of LMI households in the AA.

Community Development Lending

The institution makes a low level of CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Rochester MSA
Think makes few CD loans in the Rochester MSA. Think originated two CD loans totaling $1.65 million, representing 0.55 percent of allocated capital. Allocated capital is the percentage of deposits in the AA multiplied by the bank's tier one capital as of December 31, 2024. Loans were for the construction of a new emergency shelter and transitional housing for domestic violence victims in Rochester.

Minneapolis MSA
Think is a leader in providing CD loans in the Minneapolis MSA. Think originated three CD loans totaling $10.50 million, representing 20.22 percent of allocated capital. Think made one loan for $8.50

million to support the purchase of a portfolio of single-family homes that will be transitioned into affordable housing for first-time and LMI borrowers in the Twin Cities. Think made two loans totaling $2.00 million to support a CDFI's lending activities to nonprofits.

Product Innovation and Flexibility

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

Think uses flexible home mortgage loan programs targeted to LMI individuals. During the evaluation period, Think originated 147 loans totaling $34.60 million using various flexible home mortgage lending programs. These loans are included in the bank's home mortgage lending activity under the retail Lending Test. The following are descriptions of the flexible lending products and origination volumes during the evaluation period.

- Think continued to offer the American Deam Mortgage, which is an internally developed loan program designed for first time homebuyers. The program features up to 100 percent financing without private mortgage insurance. The bank originated 36 American Dream Mortgage loans totaling $10.24 million.
- Fannie Mae's HomeReady program is a low downpayment and flexible funding mortgage product designed for LMI borrowers. The bank originated 103 HomeReady loans totaling $23.06 million.
- In partnership with First Homes, a Rochester Area Foundation subsidiary, Think offered gap financing to LMI borrowers for downpayment and/or closing cost assistance. The bank originated two gap loans totaling $285 thousand.
- In partnership with First Homes, Think also offered conventional mortgages on community land trust properties where the trust, created by First Homes, owns the underlying land on behalf of a community to promote home affordability. This removes the cost of the land from the purchase price of the home, making properties more affordable for individuals and families. The bank originated six community land trust loans totaling $1.01 million.

Think uses flexible business loans targeted to small businesses through the Small Business Administration (SBA). Think originated four SBA loans totaling $713 thousand.

Additionally, Think made one CD loan that demonstrated innovative and flexible lending practices to support affordable housing needs. The loan totaled $8.50 million and funded a CDFI's purchase of single-family homes that will be transitioned into affordable housing for first-time and LMI borrowers in the Twin Cities. The loan was innovative through the partnership of various organizations and flexible given the interest rate is below-market and there were no personal guarantees required.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the Rochester MSA and Minneapolis MSA is adequate.

The institution has an adequate level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and CD needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments										2022-2024
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Rochester MSA	1	425	124	6,094	125	62.81	6,519	54.56	0	0
Minneapolis MSA	2	1,765	64	322	66	33.17	2,087	17.47	0	0
Broader Statewide or Regional Area	1	3,314	7	28	8	4.02	3,342	27.97	0	0
Total	**4**	**5,504**	**195**	**6,444**	**199**	**100.00**	**11,948**	**100.00**	**0**	**0**

*Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

Rochester MSA

Think has an adequate level of qualified CD investments in the Rochester MSA and exhibits good responsiveness to credit and CD needs.

Qualified investments amounted to $6.52 million and represented 2.18 percent of allocated capital. Qualified investments include a combination of prior and current period investments, as shown in the above table. Think maintained one prior period investment valued at $425 thousand that supported affordable housing. Think also made new qualified investments in the current period that consisted of 123 donations totaling $1.09 million and one new $5 million investment. Think made contributions to affordable housing, economic development, and community services for LMI individuals.

The following are examples of qualified investments in the Rochester MSA:

- Think made five donations totaling $195 thousand to an organization that provides educational and leadership programs to LMI youth.
- Think made eight donations totaling $159 thousand to an organization that provides food bank services to the Rochester MSA and other surrounding southeastern Minnesota counties and western Wisconsin.
- Think made five donations totaling $106 thousand to an organization that provides access to affordable health, educational, and housing services targeted to LMI individuals in southeast Minnesota, which includes the bank's AA.
- Think made five donations totaling $28 thousand to an organization that promotes the construction and preservation of affordable housing units.

Minneapolis MSA

Think has a significant level of qualified CD investments in the Minneapolis MSA and exhibits adequate responsiveness to credit and CD needs.

Qualified investments amounted to $2.09 million and represented 4.02 percent of allocated capital. Qualified investments include a combination of prior period and current period investments, as shown in the above table. Think maintained two prior period investments valued at $1.77 million that supported affordable housing. Think made new qualified investments in the current period that consisted of 64 donations totaling $322 thousand Think made contributions to affordable housing, economic development, and community services for LMI individuals and geographies. .

The following are examples of qualified investments in the Minneapolis MSA:

- Think made six donations totaling $53 thousand to an organization supporting domestic violence shelters by providing housing, food, and education services in Dakota County.
- Think made six donations totaling $32 thousand to an organization that provides food assistance programs to LMI households.
- Think made two donations totaling $17 thousand to an organization that builds, buys, and renovates affordable housing units for households earning less than 60 percent of the area median income.
- Think made one donation of $2 thousand to a CDFI that provides training, lending, and consulting services to small business owners.

Broader Statewide Area

In addition to the CD investments that benefited the bank's AAs, Think made seven donations totaling $28 thousand that supported community services for LMI individuals and geographies in the broader statewide area, including the bank's AAs. For example, Think made five donations totaling $20 thousand to an organization offering youth mentoring programs targeted to LMI individuals in the Twin Cities and Minneapolis.

Think also maintained one prior period investment in a Minnesota Housing Finance Agency (MFHA) bond to support affordable housing throughout the state of Minnesota.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the Rochester MSA is excellent and the performance in the Minneapolis MSA is adequate.

Retail Banking Services

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

The table below illustrates the bank's branch distribution by geography at the end of the evaluation period.

Table 5: Distribution of Branch Delivery Systems **2024**

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
Rochester MSA	85.19	5	66.67	0.00	20.00	60.00	20.00	0.00	4.65	18.07	46.97	30.32	0.00
Minneapolis MSA	14.81	3	33.33	0.00	33.33	33.33	33.33	0.00	5.47	18.60	38.67	35.74	1.53
Total	**100.00**	**8**	**100.00**	**0.00**	**25.00**	**50.00**	**25.00**	**0.00**	**5.37**	**18.54**	**39.63**	**35.11**	**1.35**

Source: FFIEC File - 2024 Census
1/1/2024 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

The table below illustrates the bank's branch openings and closings during the evaluation period.

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
Rochester MSA	0	0	0	0	0	0	0
Minneapolis MSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2024 - 12/31/2024 Bank Data.							

Rochester MSA

Branch locations are accessible to geographies and individuals of different income levels. During both analysis periods, there were five full-service branches located in the AA, with one branch located in a moderate-income CT, three branches located in middle-income CTs, and one branch located in an upper-income CT. The branch percentage in low-income geographies was below the population percentage in low-income geographies for both analysis periods. The branch percentage in moderate-income geographies exceeded the population percentage in moderate-income geographies for both analysis periods. The bank did not open or close any branches or deposit-taking ATMs in the Rochester MSA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and individuals. Lobby and drive-up hours are similar between all branches in the AA and comparable to branches in other AAs. The five branches offer similar lobby and drive-up service hours each weekday. The Downtown Rochester branch does not offer lobby hours on the weekends and it does not offer drive-up services. However, this is not a concern given the proximity of the other four branches. The downtown location does not have space to accommodate a drive-up facility and the area is predominantly weekday use with diminished traffic on the weekends.

Minneapolis MSA

Branch locations are accessible to geographies and individuals of different income levels. There were three full-service branches located in the AA, with one branch located in a moderate-income CT, one branch located in middle-income CTs, and one branch located in an upper-income CT. The branch percentage in low-income geographies was below the population percentage in low-income geographies. The branch percentage in moderate-income geographies significantly exceeded the population percentage in moderate-income geographies. The bank did not open or close any branches or deposit-taking ATMs in the Minneapolis MSA during the evaluation period.

Services and business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and individuals. Lobby and drive-up hours are the same between all branches in the AA and comparable to branches in other AAs. The three branches offer the same lobby and drive-up service hours each weekday and weekend.

Bank-wide

Think offers alternative delivery systems that are available to all individuals and geographies. These systems include online banking, mobile banking, telephone banking, and free ATM usage through the PULSE and MoneyPass ATM Networks. Additionally, Think offers online deposit and loan account applications, which provides new and existing customers the ability to apply for and open new accounts without coming to a physical branch location.

Community Development Services

The institution provides a relatively high level of CD services.

Rochester MSA
Bank employees provide an excellent level of CD services in the Rochester MSA. 14 employees provided a total of 1,117 hours to 15 qualified CD organizations benefiting the AA. CD services supported community services for LMI individuals, affordable housing, and economic development.

The following are examples of CD services provided in the Rochester MSA:

- One employee served on the Board of Directors for a nonprofit providing transportation and social service programs targeted to LMI seniors.
- One employee served on the Board of Directors for a food bank.
- One employee served on the Board of Directors for a nonprofit providing affordable homeownership programs for LMI households.

Minneapolis MSA
Bank employees provide a low level of CD services in the Minneapolis MSA. Two employees provided a total of 23 hours to two qualified CD organizations benefiting the AA. CD services supported community services for LMI individuals. One employee served on a committee for a nonprofit providing food assistance to LMI individuals. Another employee taught financial literacy to an organization that provides financial capability programs to LMI households.

Broader Statewide and Regional Area
One employee provided 72 hours to an organization that served multiple counties in Minnesota, Iowa, and Wisconsin, including three counties in the bank's AAs. The employee served as a Board member for a qualified organization supporting economic development.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 – 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, consumer loans Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Minnesota		
Rochester MSA	Full-scope	2022-2023: Dodge and Olmsted Counties. Portions of Fillmore, Goodhue, Mower, and Wabasha Counties. 2024: Dodge, Olmsted, Fillmore, and Wabasha Counties
Minneapolis MSA	Full-scope	Dakota and Hennepin Counties

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
Think Bank	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State:				
Minnesota	High Satisfactory	Low 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.

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

Table 10. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: (1) the percentage distribution of businesses with revenues of greater than $1 million; and (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 12. **Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to $500,000) originated and purchased by the bank to farms with revenues of $1 million or less to: (1) the percentage distribution of farms with revenues of greater than $1 million; and (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table 13. **Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table 14. **Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Minnesota

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
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
Rochester MSA	956	223,736	100.00	11,764	2.66	2.30	3.39	11.80	9.10	13.10	49.53	40.90	47.50	36.02	47.70	36.01	0.00	0.00	0.00
Total	**956**	**223,736**	**100.00**	**11,764**	**2.66**	**2.30**	**3.39**	**11.80**	**9.10**	**13.10**	**49.53**	**40.90**	**47.50**	**36.02**	**47.70**	**36.01**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%00																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
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
Rochester MSA	453	105,930	100.00	5,288	2.65	4.64	3.84	16.35	9.27	17.47	49.90	44.59	47.79	31.09	41.50	30.90	0.00	0.00	0.00
Total	**453**	**105,930**	**100.00**	**5,288**	**2.65**	**4.64**	**3.84**	**16.35**	**9.27**	**17.47**	**49.90**	**44.59**	**47.79**	**31.09**	**41.50**	**30.90**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
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 MSA	388	82,086	100.00	131,843	2.15	0.26	3.11	14.29	6.44	15.85	41.93	43.30	40.36	41.46	50.00	40.34	0.16	0.00	0.33
Total	**388**	**82,086**	**100.00**	**131,843**	**2.15**	**0.26**	**3.11**	**14.29**	**6.44**	**15.85**	**41.93**	**43.30**	**40.36**	**41.46**	**50.00**	**40.34**	**0.16**	**0.00**	**0.33**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" 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 - 2023
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**
Rochester MSA	956	223,736	100.00	11,764	17.18	8.47	12.89	18.20	19.56	25.95	23.06	25.10	21.74	41.55	45.50	26.92	--	1.36	12.50
Total	**956**	**223,736**	**100.00**	**11,764**	**17.18**	**8.47**	**12.89**	**18.20**	**19.56**	**25.95**	**23.06**	**25.10**	**21.74**	**41.55**	**45.50**	**26.92**	**--**	**1.36**	**12.50**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" 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																		2024
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**
Rochester MSA	453	105,930	100.00	5,288	18.40	8.39	11.02	18.94	19.43	25.76	23.36	23.40	21.26	39.30	47.46	28.76	--	1.32	13.20
Total	**453**	**105,930**	**100.00**	**5,288**	**18.40**	**8.39**	**11.02**	**18.94**	**19.43**	**25.76**	**23.36**	**23.40**	**21.26**	**39.30**	**47.46**	**28.76**	**--**	**1.32**	**13.20**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" 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 - 2024
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 MSA	388	82,086	100.00	131,843	19.18	1.80	10.24	17.21	16.24	23.31	21.34	23.20	21.41	42.27	58.25	30.48	0.00	0.52	14.56
Total	**388**	**82,086**	**100.00**	**131,843**	**19.18**	**1.80**	**10.24**	**17.21**	**16.24**	**23.31**	**21.34**	**23.20**	**21.41**	**42.27**	**58.25**	**30.48**	**0.00**	**0.52**	**14.56**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Rochester MSA	211	16,836	100.00	6,948	2.67	0.47	2.98	18.69	9.95	14.87	45.85	45.50	45.05	32.79	44.08	37.10	0.00	0.00	0.00
Total	**211**	**16,836**	**100.00**	**6,948**	**2.67**	**0.47**	**2.98**	**18.69**	**9.95**	**14.87**	**45.85**	**45.50**	**45.05**	**32.79**	**44.08**	**37.10**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Rochester MSA	97	7,058	100.00	3,565	2.75	1.03	2.47	24.47	17.53	18.74	47.00	43.30	42.61	25.77	38.14	36.19	0.00	0.00	0.00
Total	**97**	**7,058**	**100.00**	**3,565**	**2.75**	**1.03**	**2.47**	**24.47**	**17.53**	**18.74**	**47.00**	**43.30**	**42.61**	**25.77**	**38.14**	**36.19**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Minneapolis MSA	162	10,358	100.00	122,920	3.93	0.00	3.31	16.91	15.43	15.63	37.31	66.05	36.23	40.30	18.52	43.65	1.55	0.00	1.19
Total	**162**	**10,358**	**100.00**	**122,920**	**3.93**	**0.00**	**3.31**	**16.91**	**15.43**	**15.63**	**37.31**	**66.05**	**36.23**	**40.30**	**18.52**	**43.65**	**1.55**	**0.00**	**1.19**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Rochester MSA	211	16,836	100.00	6,948	84.71	78.20	52.23	4.41	21.80	10.88	0.00
Total	**211**	**16,836**	**100.00**	**6,948**	**84.71**	**78.20**	**52.23**	**4.41**	**21.80**	**10.88**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Rochester MSA	97	7,058	100.00	3,565	85.66	77.32	51.22	3.98	22.68	10.36	0.00
Total	**97**	**7,058**	**100.00**	**3,565**	**85.66**	**77.32**	**51.22**	**3.98**	**22.68**	**10.36**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Minneapolis MSA	162	10,358	100.00	122,920	87.08	37.04	49.05	4.54	62.96	8.38	0.00
Total	**162**	**10,358**	**100.00**	**122,920**	**87.08**	**37.04**	**49.05**	**4.54**	**62.96**	**8.38**	**0.00**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Farm**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**
Rochester MSA	0	0	0.00	1,170	0.61	0.00	0.00	6.75	0.00	9.06	68.10	0.00	67.52	24.54	0.00	23.42	0.00	0.00	0.00
Total	**0**	**0**	**0.00**	**1,170**	**0.61**	**0.00**	**0.00**	**6.75**	**0.00**	**9.06**	**68.10**	**0.00**	**67.52**	**24.54**	**--**	**23.42**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Farm**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**
Rochester MSA	0	0	0.00	584	0.49	0.00	0.00	18.48	0.00	18.32	65.73	0.00	67.12	15.30	0.00	14.55	0.00	0.00	0.00
Total	**0**	**0**	**0.00**	**584**	**0.49**	**0.00**	**0.00**	**18.48**	**0.00**	**18.32**	**65.73**	**0.00**	**67.12**	**15.30**	**0.00**	**14.55**	**0.00**	**0.00**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Farm**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**
Minneapolis MSA	0	0	0.00	670	2.01	0.00	0.15	14.94	0.00	5.37	41.07	0.00	50.90	41.60	0.00	43.58	0.38	0.00	0.00
Total	**0**	**0**	**0.00**	**670**	**2.01**	**0.00**	**0.15**	**14.94**	**0.00**	**5.37**	**41.07**	**0.00**	**50.90**	**41.60**	**0.00**	**43.58**	**0.38**	**0.00**	**0.00**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2023
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Rochester MSA	0	0	0.00	1,170	98.04	0.00	57.69	1.35	0.00	0.61	0.00
Total	**0**	**0**	**0.00**	**1,170**	**98.04**	**0.00**	**57.69**	**1.35**	**0.00**	**0.61**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2024
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Rochester MSA	0	0	0.00	584	98.29	0.00	59.25	1.10	0.00	0.61	0.00
Total	**0**	**0**	**0.00**	**584**	**98.29**	**0.00**	**59.25**	**1.10**	**0.00**	**0.61**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Minneapolis MSA	0	0	0.00	670	96.27	0.00	67.61	1.82	0.00	1.91	0.00
Total	**0**	**0**	**0.00**	**670**	**96.27**	**0.00**	**67.61**	**1.82**	**0.00**	**1.91**	**0.00**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2023
Assessment Area:	**Total Consumer Loans**			**Low-Income Tracts**		**Moderate-Income Tracts**		**Middle-Income Tracts**		**Upper-Income Tracts**		**Not Available-Income Tracts**	
	#	**$**	**% of Total**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Rochester MSA	4,309	79,160	100.00	4.08	4.27	15.97	11.60	46.68	46.99	33.26	37.13	0.00	0.00
Total	**4,309**	**79,160**	**100.00**	**4.08**	**4.27**	**15.97**	**11.60**	**46.68**	**46.99**	**33.26**	**37.13**	**0.00**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2024
Assessment Area:	**Total Consumer Loans**			**Low-Income Tracts**		**Moderate-Income Tracts**		**Middle-Income Tracts**		**Upper-Income Tracts**		**Not Available-Income Tracts**	
	#	**$**	**% of Total**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Rochester MSA	1,674	26,438	100.00	4.08	5.38	20.44	15.11	47.13	48.09	28.35	31.42	0.00	0.00
Total	**1,674**	**26,438**	**100.00**	**4.08**	**5.38**	**20.44**	**15.11**	**47.13**	**48.09**	**28.35**	**31.42**	**0.00**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
Assessment Area:	**Total Consumer Loans**			**Low-Income Tracts**		**Moderate-Income Tracts**		**Middle-Income Tracts**		**Upper-Income Tracts**		**Not Available-Income Tracts**	
	#	**$**	**% of Total**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Minneapolis MSA	1,844	36,992	100.00	4.93	0.70	18.93	11.66	39.88	44.36	35.08	42.90	1.18	0.38
Total	**1,844**	**36,992**	**100.00**	**4.93**	**0.70**	**18.93**	**11.66**	**39.88**	**44.36**	**35.08**	**42.90**	**1.18**	**0.38**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2023
Assessment Area:	**Total Consumer Loans**			**Low-Income Borrowers**		**Moderate-Income Borrowers**		**Middle-Income Borrowers**		**Upper-Income Borrowers**		**Not Available-Income Borrowers**	
	#	**$**	**% of Total Number**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Rochester MSA	4,309	79,160	100.00	21.00	51.73	16.59	21.03	19.36	14.06	43.05	13.18	0.00	0.00
Total	**4,309**	**79,160**	**100.00**	**21.00**	**51.73**	**16.59**	**21.03**	**19.36**	**14.06**	**43.05**	**13.18**	**0.00**	**0.00**
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2024
Assessment Area:	**Total Consumer Loans**			**Low-Income Borrowers**		**Moderate-Income Borrowers**		**Middle-Income Borrowers**		**Upper-Income Borrowers**		**Not Available-Income Borrowers**	
	#	**$**	**% of Total Number**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Rochester MSA	1,674	26,438	100.00	22.10	50.72	17.21	24.19	19.65	13.08	41.04	12.01	0.00	0.00
Total	**1,674**	**26,438**	**100.00**	**22.10**	**50.72**	**17.21**	**24.19**	**19.65**	**13.08**	**41.04**	**12.01**	**0.00**	**0.00**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	**Total Consumer Loans**			**Low-Income Borrowers**		**Moderate-Income Borrowers**		**Middle-Income Borrowers**		**Upper-Income Borrowers**		**Not Available-Income Borrowers**	
	#	**$**	**% of Total Number**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Minneapolis MSA	1,844	36,992	100.00	23.70	45.39	16.41	19.09	18.18	14.64	41.72	20.88	--	--
Total	**1,844**	**36,992**	**100.00**	**23.70**	**45.39**	**16.41**	**19.09**	**18.18**	**14.64**	**41.72**	**20.88**	**--**	**--**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													