

2023 COMMUNITY REINVESTMENT ACT STATEMENT

BankNorth with its main office located at 340 Main Street, Arthur, ND 58006

and Branch Offices located at 405 Main Street, Buffalo, ND 58011 41 Langer Avenue S, Casselton, ND 58012 324 Railway Street, Enderlin, ND 58027 100 1st Avenue SW, LaMoure, ND 58458 1002 S Main Street, Lisbon, ND 58054 205 4th Main Avenue, Marion, ND 58466 620 Main Avenue, Oakes, ND 58474 2201 6th Ave SE, Suite 15, Aberdeen, SD 57401 and 2 W Main Street, Warner, SD 57479

adopts and publishes this Community Reinvestment Act Statement in compliance with the Community Reinvestment Act of 1977.

Local Community

BankNorth seeks to meet the credit needs of individuals and firms living and doing business within its communities and assessment area delineated by the attached maps. Our two assessment areas include the following census tracts:

North Dakota: all census tracts in Cass, Dickey, LaMoure, Ransom and Sargent Counties; Tracts 9703 and 9704 in Traill County; 9672 in Stutsman County; 9679 and 9680 in Barnes County, and 9707 in Richland County. The Arthur branch is located in census tract 0402.00, Buffalo branch in census tract 0401.00, Casselton in census tract 0403.00, Enderlin in tract 9689, LaMoure in tract 9721, Lisbon in tract 9691, Marion in tract 9722 and Oakes in tract 9732.

South Dakota: all census tracts in Brown and Faulk Counties; Tracts 1 and 2 in Spink County and 9621 in Edmunds County. The Aberdeen office is located in tract 9518 and the Warner office in tract 9519.

<u>Credit</u>

The bank makes the following types of credit available to qualified borrowers on the basis of demonstrated proper purpose and borrower qualifications:

- Agricultural Loans
- Commercial Loans
- Construction Loans

- Small Business Loans
- Home Purchase Loans: 1-4 Family Units
 - 5 or More Family Units

- Housing Rehabilitation Loans
- Community Development Loans
- Consumer Loans, including but not limited to:

Vehicle Loans Home Improvement Loans Debt Consolidation Loans Overdraft Protection Loans

Online Banking, Bill Pay, Mobile Banking, Mobile Check Deposit and Remote Deposit Capture are available to customers who wish to use the convenience of completing transactions from their home, business or mobile device. Every precaution is taken to ensure the security and privacy of these services.

The Bank, through participation with a third party, makes available Visa/MasterCard credit card applications and ATM/Debit cards to its customers.

COMMUNITY CREDIT NEEDS

The Bank currently participates in and will continue to participate in a broad range of community based programs designed to meet the credit needs of its local community through credit services, direct personal involvement of its employees, and cooperation with community officials and agencies.

DEPOSIT PRODUCTS

Regular Checking Account

Deposit \$50 to open the account.

No monthly service charge. No minimum balance requirement.

Regular Savings Account

Deposit \$25 to open the account.

Minimum average daily balance of \$25.00 to obtain the disclosed annual percentage yield.

No minimum balance or per item charges.

IRA Savings Account

Deposit \$25 to open the account.

No minimum balance or per item charges.

Money Market Deposit Accounts

Deposit \$2,500 to open the account.

Limitations – 6 per month by pre-authorized or automatic transfer, telephone, check, draft or debit card.

Transfers and withdrawals in person are unlimited.

Regular MMDA: monthly minimum balance charge of \$10.00 if the average daily balance drops below \$2,500 for the statement period. Fees could reduce earnings on the account.

TrueNorth MMDA: no minimum balance or per item charges.

NOW Account

Deposit \$500 to open the account.

Service Charges: Monthly minimum balance charge of \$7.50 if the average daily balance drops below \$500 for the statement period. Fees could reduce earnings on the account.

Certificate of Deposit Accounts (CD) 3 Months – 60 Months

\$1,000 minimum balance to open the account

A penalty may be imposed for early withdrawal.

A withdrawal will reduce earnings.

BANKING HOURS

Arthur

Census Tract 0402.00

340 Main Street Arthur, ND 58006 Phone: (701) 967-8914

Lobby & Drive-Up Hours M-F: 8 am-4 pm

Buffalo

Census Tract 0401.00

405 Main Street Buffalo, ND 58011 Phone: (701) 633-5106

M-F: 8 am-4 pm

Casselton

Census Tract 0403.00

41 Langer Ave South Casselton, ND 58012 Phone: (701) 347-4540

Lobby & Drive-Up Hours M-F: 8 am-4 pm

Enderlin

Census Tract 9689.00

324 Railway Street Enderlin, ND 58027 Phone: (701) 437-2100

Lobby & Drive-Up Hours M-F: 8 am-4 pm

Marion

Census Tract 9722.00

205 4th Main Ave Marion, ND 58466 Phone: (701) 669-2293

M, T, Th: 9 am-12 pm

LaMoure

Census Tract 9721.00

100 1st Avenue SW LaMoure, ND 58458 Phone: (701) 883-5321

Lobby & Drive-Up Hours M-F: 8 am-4 pm

Oakes

Census Tract 9732.00

620 Main Avenue Oakes, ND 58474 Phone: (701) 742-2694

Lobby & Drive-Up Hours M-F: 8 am – 4 pm

Warner

Census Tract 9519.00

2 West Main St Warner, SD 57479 Phone: (605)225-9605

Lobby & Drive-Up Hours M-F: 8 am – 4 pm

Lisbon

Census Tract 9691.00

1002 S Main Street Lisbon, ND 58054 Phone: (701) 683-2100

Lobby & Drive-Up Hours M-F: 8 am-4 pm

Aberdeen

Census Tract 9518.00

2201 6th Ave SE, Suite 15 Aberdeen, SD 57401 Phone: (605) 225-1400

Lobby & Drive-Up Hours M-F: 8 am – 4 pm

ACCOUNT FEES

Account Printout Account Research Account Reconciliation ATM - Debit Card Replacement Collection Item Charge Continuous Overdraft Charge Deposited Item Charged Back NSF Return Check Charge

Overdraft Charges Personal Money Order Reissue Bill Pay check Stop Payment Charge Wire Transfer

MISCELLANEOUS FEES

Bond Coupon Collection Check cashing - non customer Coin Counting Fax Transmittals

Garnishment/Levy Night Deposit Lock bag Photo-copies

LOAN TO DEPOSIT RATIO

March 2022	76.90%	March 2023	90.48%
June 2022	90.95%	June 2023	109.37%
September 2022	97.96%	September 2023	113.76%
December 2022	93.16%	December 2023	104.60%

BRANCHES OPENED OR CLOSED DURING THE CURRENT YEAR AND EACH OF THE PRIOR TWO CALENDAR YEARS:

\$2.00 \$40.00 per hour/ \$25 minimum \$40.00 per hour/ \$25 minimum \$10.00 / \$20 rush order \$15.00 per item \$35.00 assessed after every 7 calendar days account is overdrawn \$20.00 per item \$35.00 per item / \$210.00 daily maximum (Items may be presented multiple times. A fee may be charged each time an item is returned unpaid.) \$30.00 per item / \$180.00 daily maximum \$5.00 per money order \$45.00 \$30.00 per item \$25.00 outgoing / \$20.00 incoming / \$50.00 outgoing International

\$5.00 per envelope \$5.00 \$3.00 per \$100 for non account holders - \$3.00 minimum No charge to customers; \$5.00 outgoing/\$2.00 incoming for non-customers \$15.00 \$15.00 per bag + \$2.00 for key \$.25 each black and white/\$1.00 each color copy

None

TO OUR COMMUNITIES:

BankNorth is committed to the growth and prosperity of all the neighborhoods in the communities it serves. We take pride in our long tradition of community involvement and leadership and work aggressively to assess and respond to the credit needs of individuals who live in low-to-moderate income neighborhoods.

It is BankNorth's policy to make credit available to all individuals regardless of race, sex, marital status, age, national origin, disabilities, familial status, receipt of public assistance, religion, or because they registered a previous complaint under the Consumer Protection law.

BankNorth's Community Reinvestment Act Program consists of activities designed to identify and understand the credit needs of our communities, provide products, services and programs to respond to those needs and communicate our products and services to the communities it serves. This report covers our 2023 CRA efforts.

UNDERSTANDING COMMUNITY NEEDS

COMMUNITY CONTACTS

BankNorth relies on many different methods for determining the credit needs of the communities it serves. These activities include but are not limited to community involvement, meetings with community leaders and organizations, advertising and marketing programs.

BankNorth continued to support local development by participating in municipal bonds or loans for Job Development Authority City of Arthur, Buffalo Rural Fire Protection District, Casselton Park, Northern Cass ND ISD, Enderlin Rural Fire Protection District, City of LaMoure, Housing Authority City of LaMoure, LaMoure Community Development Coproration, Litchville-Marion School District and City of Verona.

INVOLVEMENT IN COMMUNITY ORGANIZATIONS

BankNorth employees are strongly encouraged to be involved in community and neighborhood organizations involved in community development or other CRA-related activities. Employees and Board members serve on numerous organizations related to community development and affordable housing, including:

Arthur Job Development Authority **Barnes County Wildlife Buffalo Economic Improvement Corporation Buffalo Food Market Casselton Community Endowment Foundation Casselton Job Development Authority** Casselton Renaissance Zone Authority **Central Cass Treehouse** Community of Care Dakota Medical Foundation/Sinner Bresnahan Healthy Kids Initiative Dare 2 Stand Out Dollars for Scholars – Buffalo, Casselton **Enderlin Alumni Association Gaming** Enderlin Area Community Endowment Fund Enderlin Community Development Greater Fargo-Moorhead EDC **Growing Small Towns** Growth Initiative Fund (funds PACE & other business development tools throughout Cass County) LaMoure Airport Authority LaMoure Chamber Retailers LaMoure City Council LaMoure Community Development Corporation LaMoure County – local township board and Township Supervisors LaMoure Housing Authority LaMoure Lions LaMoure School Vocational Education Advisory Committee LaMoure Volunteer Fire Department Lisbon Aging in Community

Lisbon Area Community Foundation Fund Lisbon Visitor's Bureau Little Loboes Bright Beginnings Maryhill Manor ND Community Foundation North Dakota Opportunity Fund North Dakota Small Business Development Center Parkside Lutheran Home - Lisbon Ransom County 4-H Sleep in Heavenly Peace South Central Dakota Regional Council Vets Inc. VFW Post 4655 Warner Volunteer Fire Department Warner-Stratford Lions

Employees and Board members meet regularly with area religious leaders and are also active in various clubs and organizations in the community.

BANKING PRODUCTS AND PROGRAMS

MORTGAGE LOAN PROGRAMS

BankNorth continued to provide the communities it serves with conventional mortgage loans that are serviced in house. This year the offices generated 25 real estate loans for the total dollar amount of \$5,641,666.

SPECIAL LOAN PROGRAMS

BankNorth continues to offer a variety of loan programs designed to meet the needs of the individuals and neighborhoods in their communities including:

AXA Equitable BND AG Loan Programs-Ag Commodity Export Ag PACE Ag Diversification & Development **Beginning Farmer Chattel and Real Estate Biofuels PACE** Envest Established Farmer Real Estate Family Farm Loan Farm and Ranch Participation Farm Operating Farm Real Estate Loan Guarantee **First Time Farmer Finance** FSA Guaranteed Loan Purchase Livestock Waste Management **BND Business Loan Programs-**Accelerated Growth Loan

Bank Participation Loan Bank Stock Beginning Entrepreneur Loan Business Development Loan Export Enhancement Flex PACE for Affordable Housing Flex PACE Match Program **PACE** Program SBA Guaranteed Loan Purchase **USDA Government Loan Purchase** Value-added Guarantee Loan Venture Capital Fund **BND** Disaster Programs **Dream Works Fund** Farmer Mac Program FHLB Rural Homeownership Fund FSA - Farm Service Agency Grow SD Lake Agassiz Regional Development Loans North Dakota Development Fund (ND Dept of Commerce) North Dakota Rural Rehabilitation Northeast Council of Governments (NECOG) Northeast South Dakota Economic Corporation (NESDEC) PCBB (Pacific Coast Bankers Bank) BLP loan program Small Business Administration loan programs Secondary Market Housing Loans State Small Business Credit Initiative: ND Opportunity Fund, Red River Corridor Fund USDA Rural Development – Business and Industry Program

GOVERNMENT LOAN PROGRAMS

In 2023 BANKNORTH participated in 11 USDA Farm Service Agency loans to area farmers and businesses in the amount of \$3,508,904.

2023 LOANS ORIGINATED

- Consumer Loans
 289 \$8,360,395
- Commercial Loans
 253
 \$86,118,290
- Agricultural Loans (including U.S. Govt guaranteed loans) 822 \$339,297,139

DEPOSIT PRODUCTS

BankNorth offers a variety of deposit products to meet the needs of all customers we serve including:

Regular Checking

NOW Accounts Money Market Checking Regular Savings IRA Savings Certificates of Deposit

COMMUNITY DEVELOPMENT PARTNERSHIPS AND INVESTMENTS

In addition to regular support of local community scholarship programs and Dollars for Scholars Chapters, local food pantries, 4-H Clubs, and Community of Care, the bank also supports local school districts and financial literacy programs.

Board members and employees of the Bank are active in the Arthur Job Development Authority. Rick Burgum - President of the corporation, Matt Evenson - Vice-President and Jim Williams - Director.

MARKETING PROGRAMS AND COMMUNITY OUTREACH

ADVERTISING

BankNorth advertises its services on local radio, in local newspapers, and various local publications throughout the year.

The following media are used to communicate bank products:

Aberdeen Insider	KKAA Radio
Aberdeen News	KMJO Radio
BEK Sports Network	KMOM Radio
Bison Illustrated	KQDJ Radio
Cass County Reporter	KQLX Radio
Enderlin Independent	KRVX Radio
Fargo INC	KSDN Radio
Farm and Home Publication	Kulm Messenger
Future Farmer	KVMI KZTK Radio
KDDR Radio	KXGT Radio
KFGO Radio	LaMoure Chronicle
KGIM Radio	Litchville Bulletin

Oakes Times Pifer's Auction & Realty Ransom County Gazette SD Scores (App) SD SportsScene Steele County Press The Forum Tri-County News, Gackle Valley City Times Record WDAY Radio Your Live Event (YLE)

The bank maintains a website at <u>www.ibanknorth.com</u> as well as message centers at various banking locations. Social media sites such as Facebook, LinkedIn and Instagram are also used for marketing.

ADDITIONAL CRA EFFORTS

BankNorth places a high priority on meeting its obligations under the Community Reinvestment Act and communicates that priority to its employees. The Board of Directors are actively involved in the CRA efforts as is documented in the annual legal board meeting.

CORPORATE GIVING AND VOLUNTEERISM

BankNorth's top priority is to complement the community reinvestment efforts of the bank by directing corporate giving to community-based organizations that work in our communities.

In 2023, the bank supported area organizations and community development programs with more than \$800,000 in donations and sponsorships including:

4-H – Brown, Cass, Dickey, Edmunds, LaMoure and Ransom Counties Aberdeen Chamber of Commerce Boys and Girls Club of Aberdeen Buffalo Area Quick Response Unit Cass County Rural Community Emergency Food Pantry Central Cass School District Community of Care Community Volunteer EMS of LaMoure Dollars for Scholars or local scholarship programs- Arthur, Buffalo, Casselton, Enderlin, LaMoure, Lisbon, Litchville-Marion, Oakes, Page, Aberdeen and Warner. Enderlin Area School District Enderlin Rural Fire Protection District Grand Farm Research & Education Initiative Hospice of the Red River Valley LaMoure Lions – LaMoure Track Facility Litchville Marion School Maple Valley School District Northern Cass School North Dakota Community Foundation North Dakota Veteran's Home Foundation Northern Cass School **Oakes Area Community Foundation Oakes Community Hospital Foundation Oakes Public School Ransom County Fair Association Red River Chapter of National AMBUCS** Sanford Emergency Food Pantry Sleep in Heavenly Peace Aberdeen Chapter South Dakota Community Foundation – Warner Area Community Foundation Warner School District

BankNorth

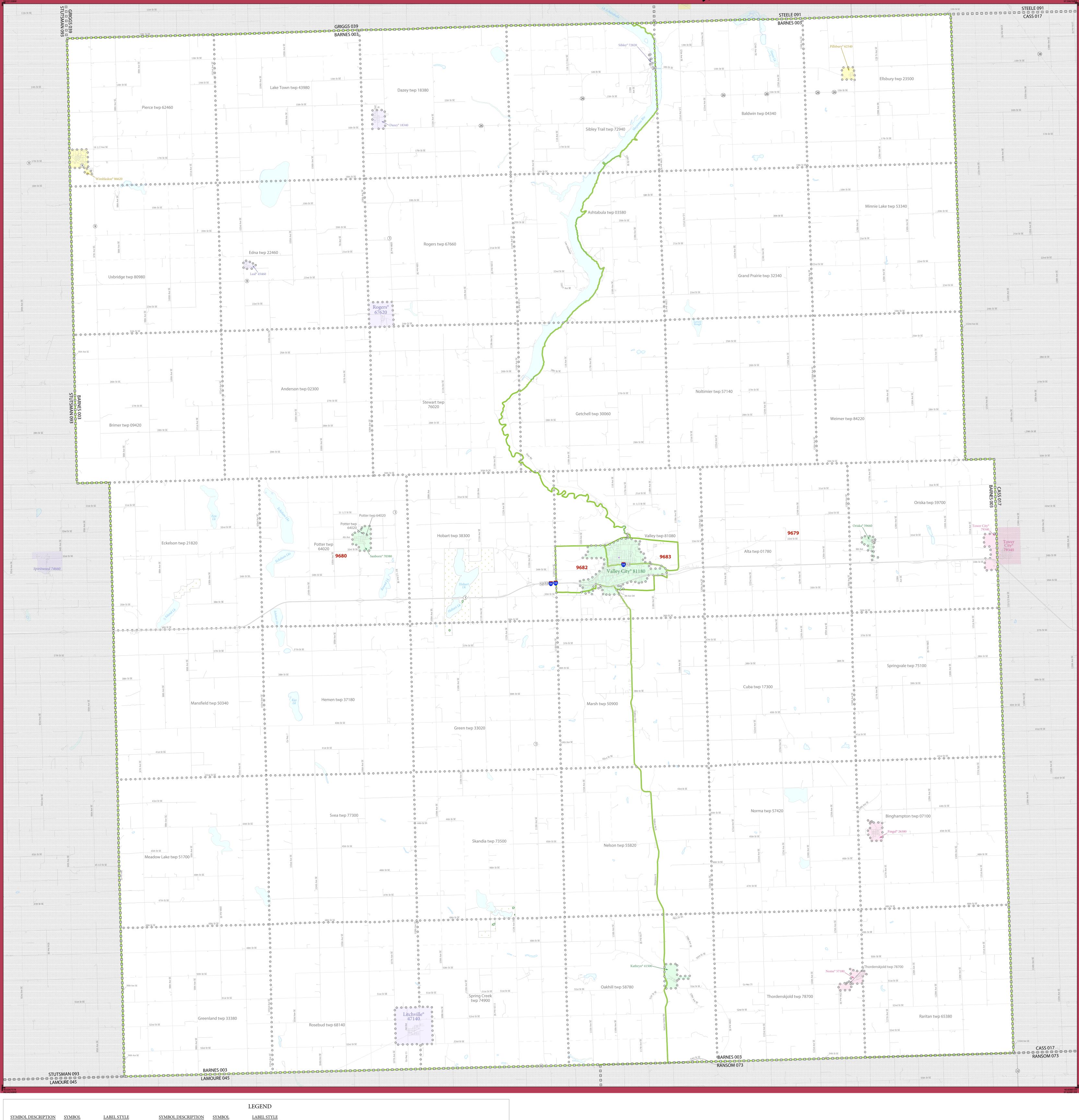
2023 Community Reinvestment Act Assessment Area

North		
Dakota		Income
(038)	Tract	Level
Cass (017)		Upper
Cass (017) Cass (017)		Moderate
Cass (017) Cass (017)		Middle
Cass (017) Cass (017)		Upper
Cass (017) Cass (017)		Middle
Cass (017) Cass (017)		Moderate
Cass (017)	5.02	
Cass (017)		Moderate
Cass (017)	6.02	
Cass (017)	7.00	
Cass (017)		Middle
Cass (017)		Moderate
Cass (017)		Middle
Cass (017)		Moderate
Cass (017)		Middle
Cass (017)		Moderate
Cass (017)		Middle
Cass (017)		Moderate
Cass (017)		Moderate
Cass (017)		Middle
Cass (017)	101.10	
Cass (017)	101.11	
Cass (017)	102.01	Middle
Cass (017)	102.05	Upper
Cass (017)	102.06	Middle
Cass (017)	103.03	Middle
Cass (017)	103.06	Middle
Cass (017)	103.07	Upper
Cass (017)	103.08	Middle
Cass (017)	401.00	Middle
Cass (017)	402.00	Middle
Cass (017)	403.00	Middle
Cass (017)	405.01	Middle
Cass (017)	405.02	Upper
Cass (017)	405.03	Upper
Cass (017)		Middle
Cass (017)	405.05	Upper
Cass (017)	405.06	
Cass (017)	405.07	Upper
Cass (017)	405.08	
Cass (017)	405.09	
Cass (017)	406.00	Middle
Cass (017)	407.00	Moderate
Cass (017)	408.00	Upper

North Dakota		
(038)	Tract	Income Level
Stutsman (093)	9672	Middle
Barnes (003)	9679	Middle
Barnes (003)	9680	Middle
Ransom (073)	9689	Middle / Distressed & Underserved
Ransom (073)	9690	Middle / Distressed & Underserved
Ransom (073)	9691	Middle / Distressed & Underserved
Traill (097)	9703	Middle / Underserved
Traill (097)	9704	Middle / Underserved
Richland (077)	9707	Middle / Distressed
LaMoure (045)	9721	Middle / Distressed & Underserved
LaMoure (045)	9722	Middle / Distressed & Underserved
Dickey (021)	9732	Middle / Underserved
Dickey (021)	9733	Middle / Underserved
Dickey (021)	9734	Middle / Underserved
Sargent (081)	9740	Middle / Distressed & Underserved
Sargent (081)	9742	Middle / Distressed & Underserved

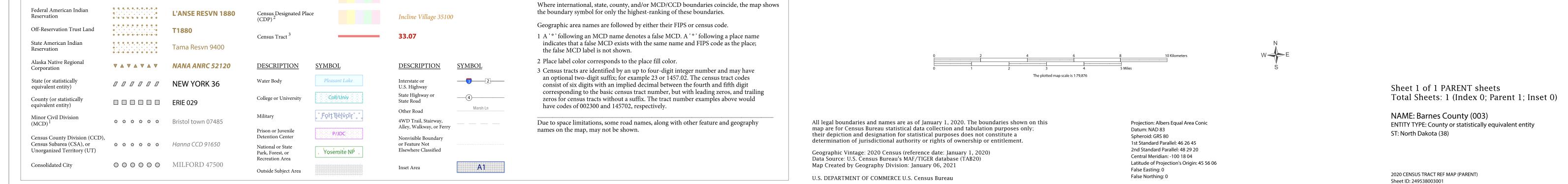
South Dakota		
(046)	Tract	Income Level
Brown (013)	9513	Upper
Brown (013)	9514	Upper
Brown (013)	9515	Moderate
Brown (013)	9516	Middle
Brown (013)	9517	Middle
Brown (013)	9518	Middle
Brown (013)	9519	Upper
Brown (013)	9520	Upper
Faulk (049)	9611	Middle / Distressed & Underserved
Edmunds (045)	9621	Middle
Spink (115)	1	Middle / Distressed & Underserved
Spink (115)	2	Middle / Distressed & Underserved

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Barnes County, ND



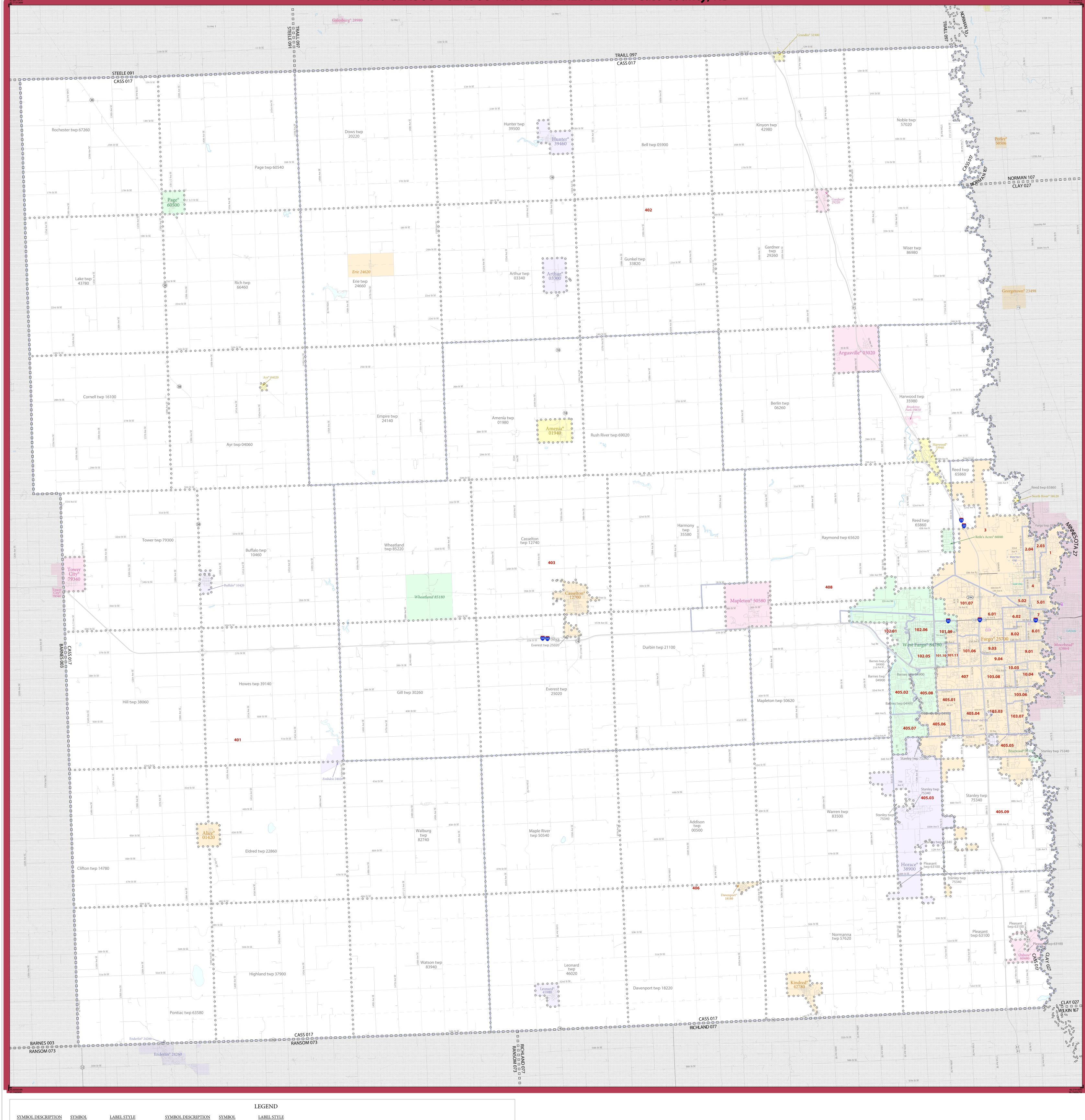
International 合合合合合 CANADA Incorporated Place 1,2

Davis 18100

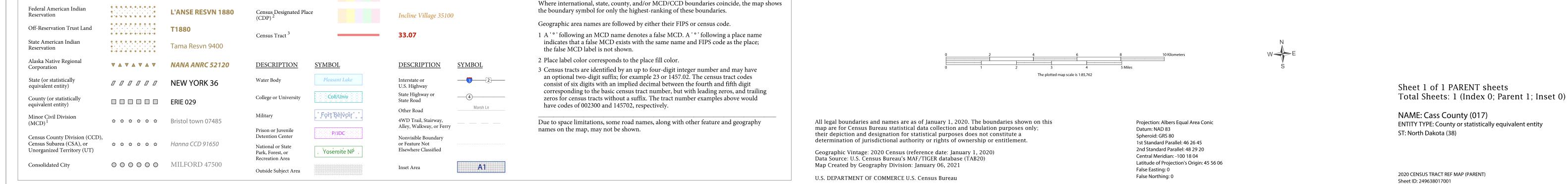


United States°

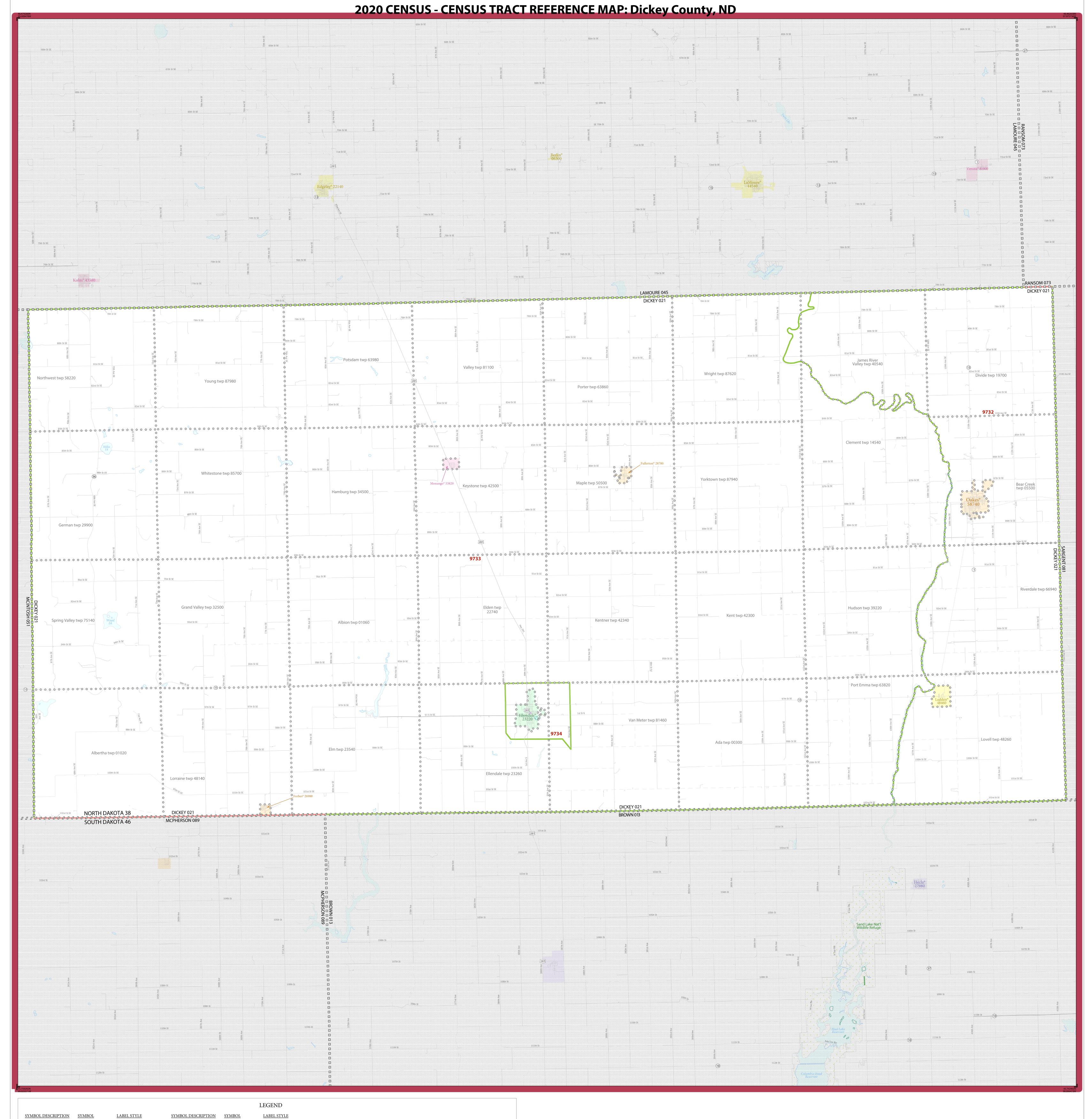
2020 CENSUS - CENSUS TRACT REFERENCE MAP: Cass County, ND



International 合合合合 CANADA Incorporated Place ^{1,2} Davis 18100

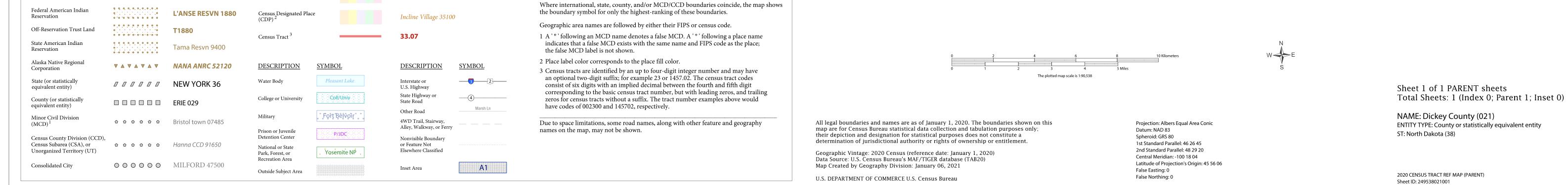


United States[®]



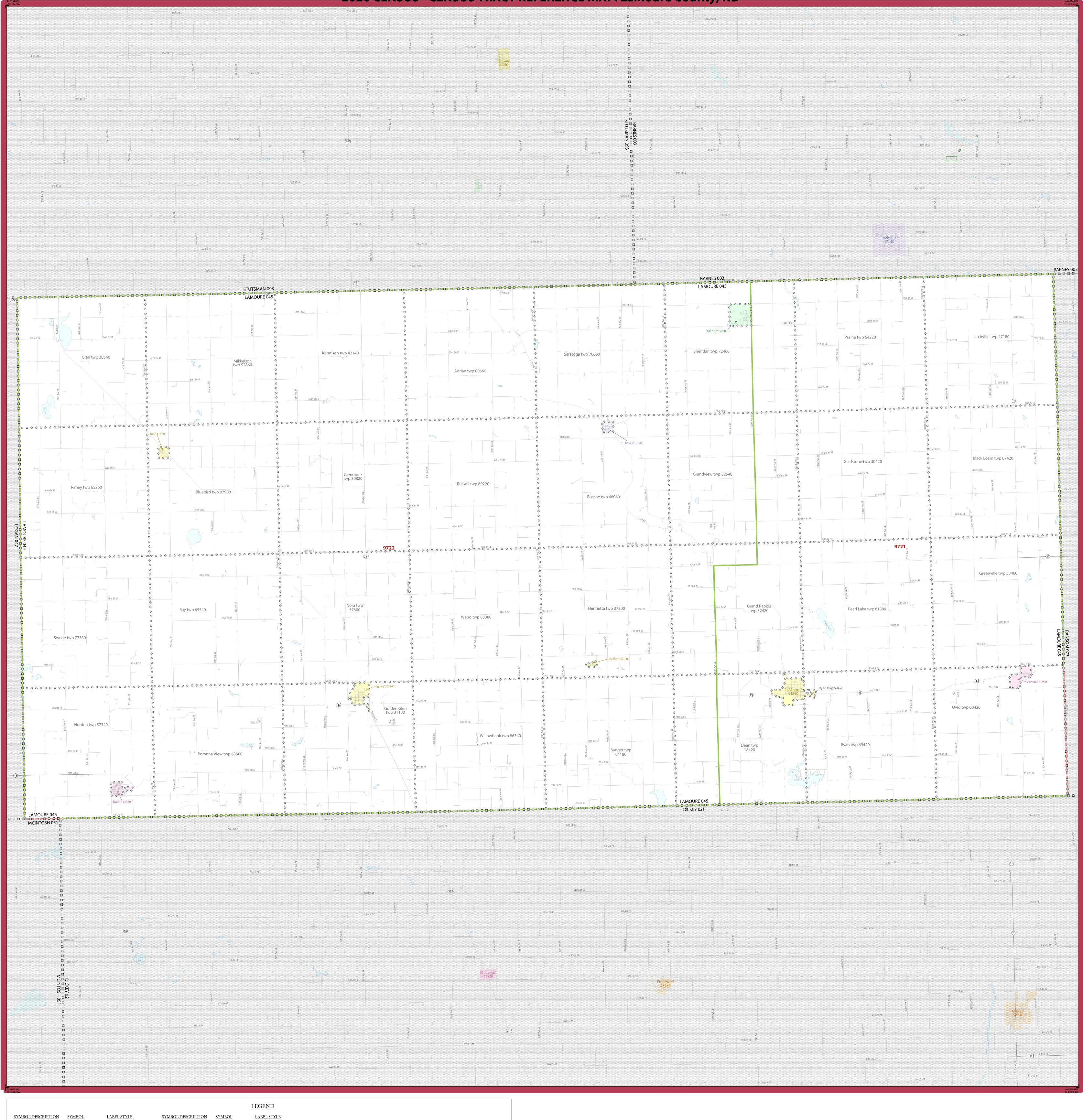
International 合合合合合 CANADA Incorporated Place ^{1,2}

Incorporated Place ^{1,2} Davis 18100

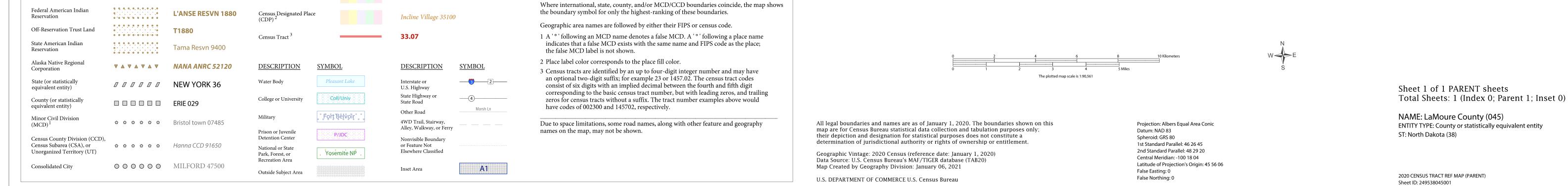


United States°

2020 CENSUS - CENSUS TRACT REFERENCE MAP: LaMoure County, ND

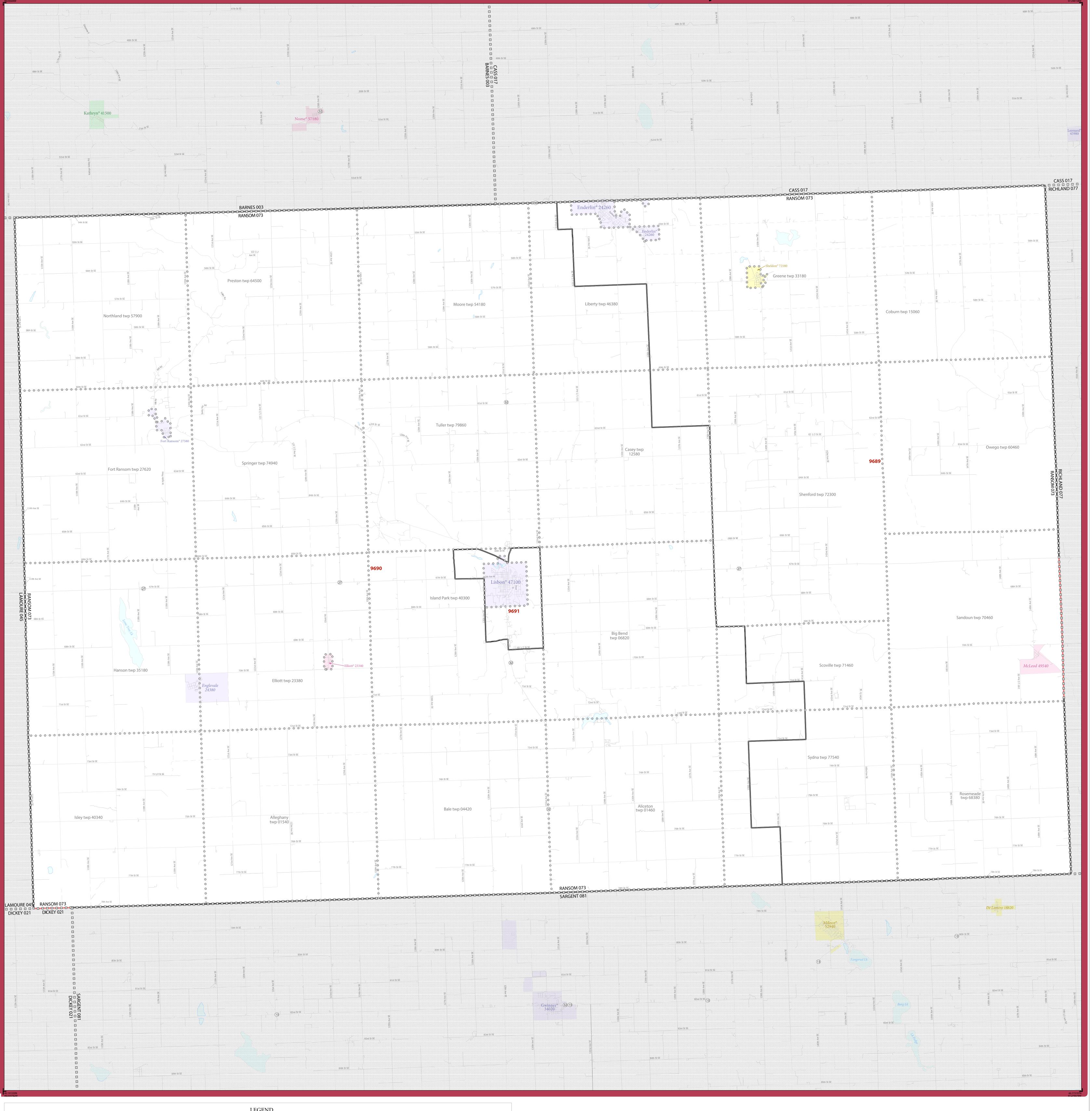


Davis 18100 Incorporated Place ^{1,2} Internationa

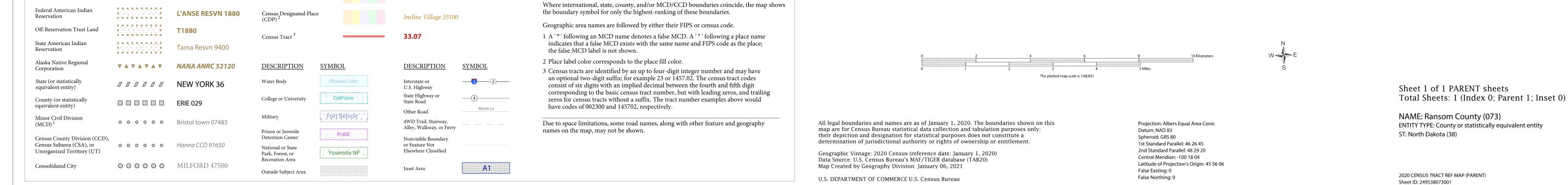


United States°

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Ransom County, ND

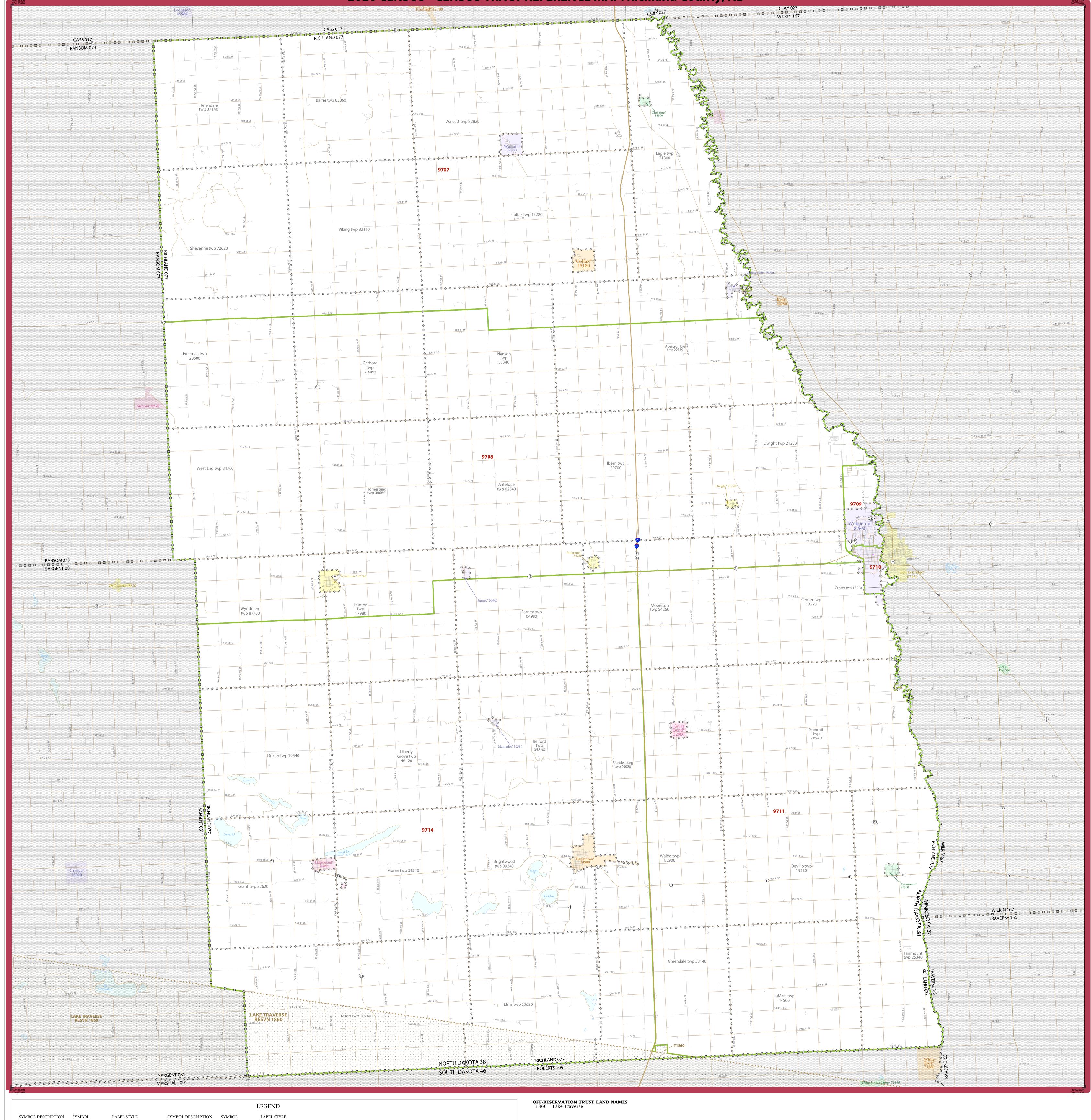


					LEGEND
SYMBOL DESCRIPTION	<u>SYMBOL</u>	LABEL STYLE	SYMBOL DESCRIPTION	<u>SYMBOL</u>	LABEL STYLE
International		CANADA	Incorporated Place ^{1,2}		Davis 18100



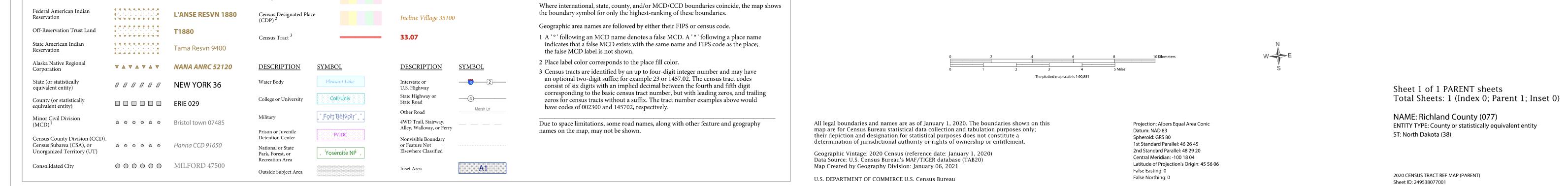
United States°

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Richland County, ND



☆☆☆☆☆ CANADA Incorporated Place 1,2 International

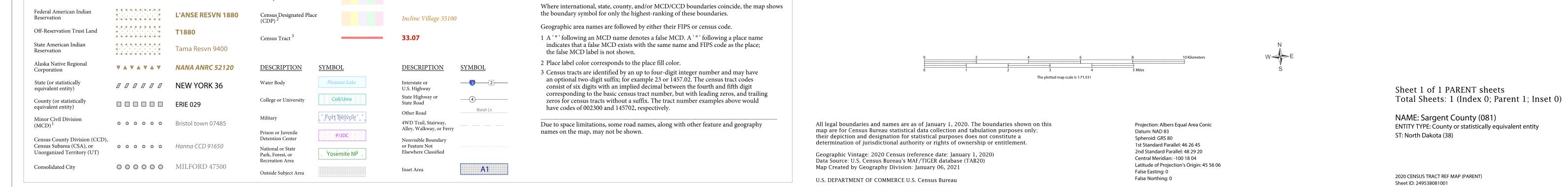
Davis 18100



United States[®]



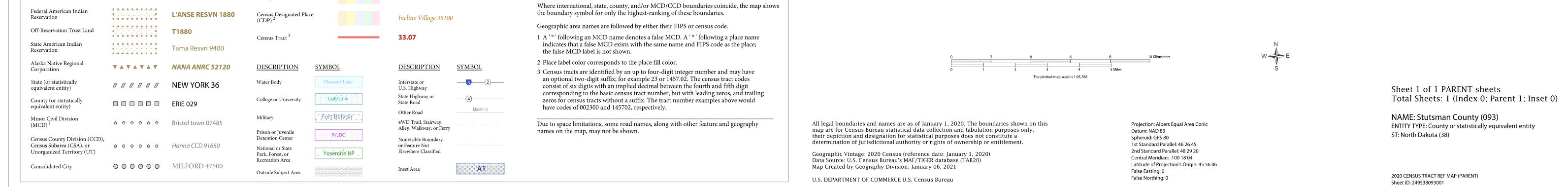
					LEGEND
SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	<u>SYMBOL</u>	LABEL STYLE
International		CANADA	Incorporated Place ^{1,2}		Davis 18100



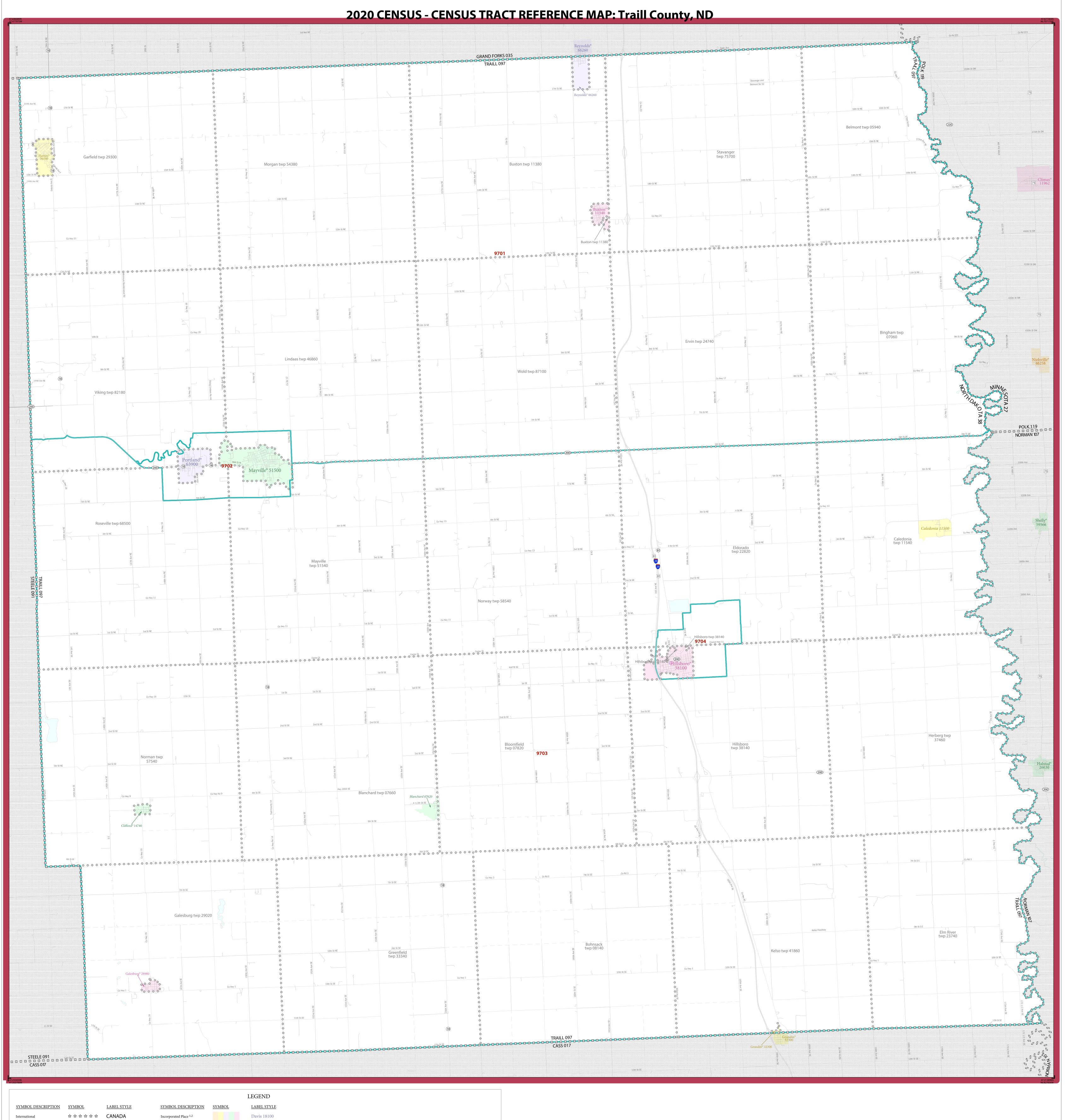
United States°

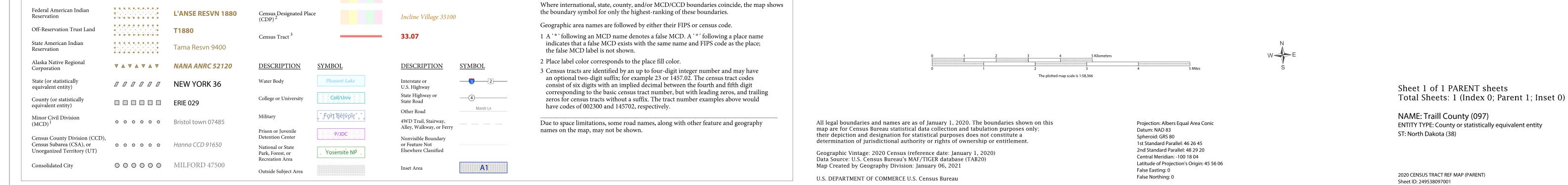


					LEGEND
SYMBOL DESCRIPTION	<u>SYMBOL</u>	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International		CANADA	Incorporated Place ^{1,2}		Davis 18100



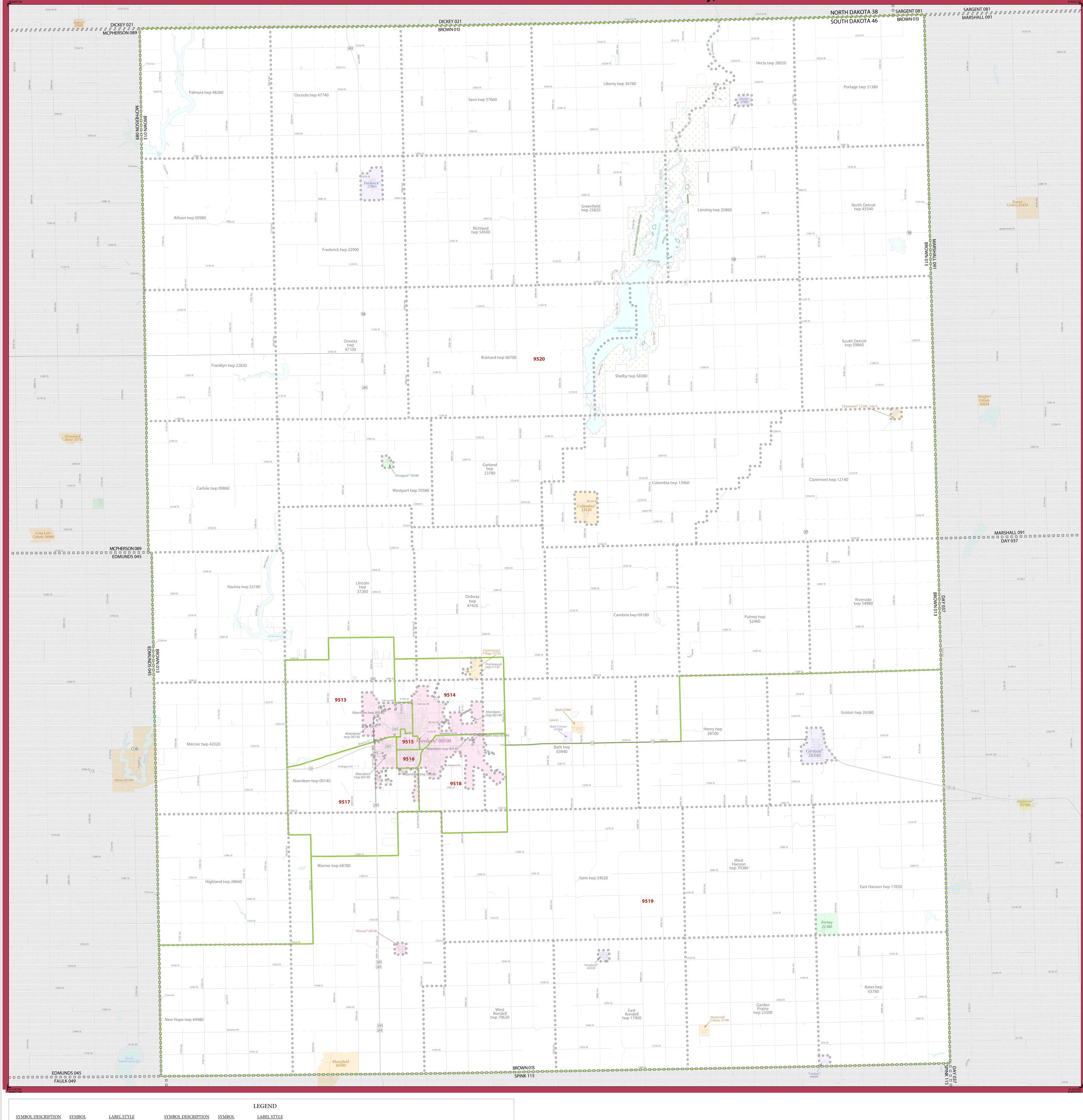
United States°





United States°

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Brown County, SD



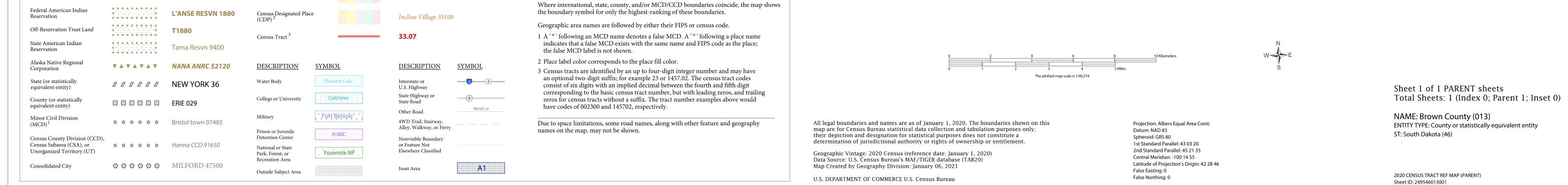
☆☆☆☆☆ CANADA Incorporated Place 1,2 International

SYMBOL DESCRIPTION SYMBOL

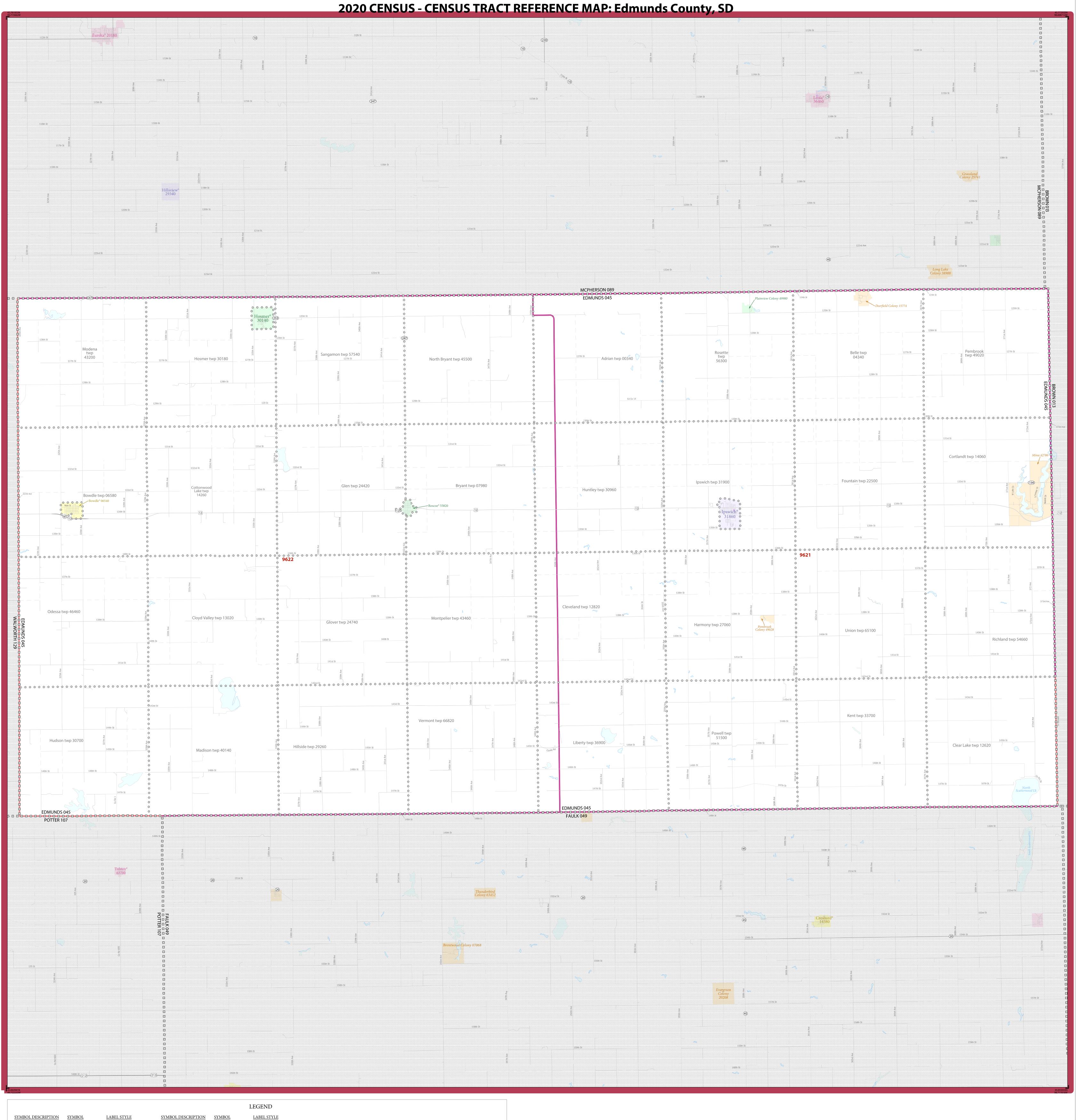
SYMBOL DESCRIPTION

<u>SYMBO</u>

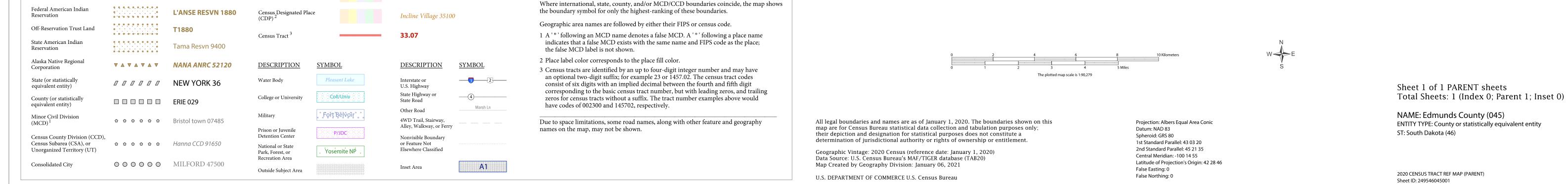
Davis 18100

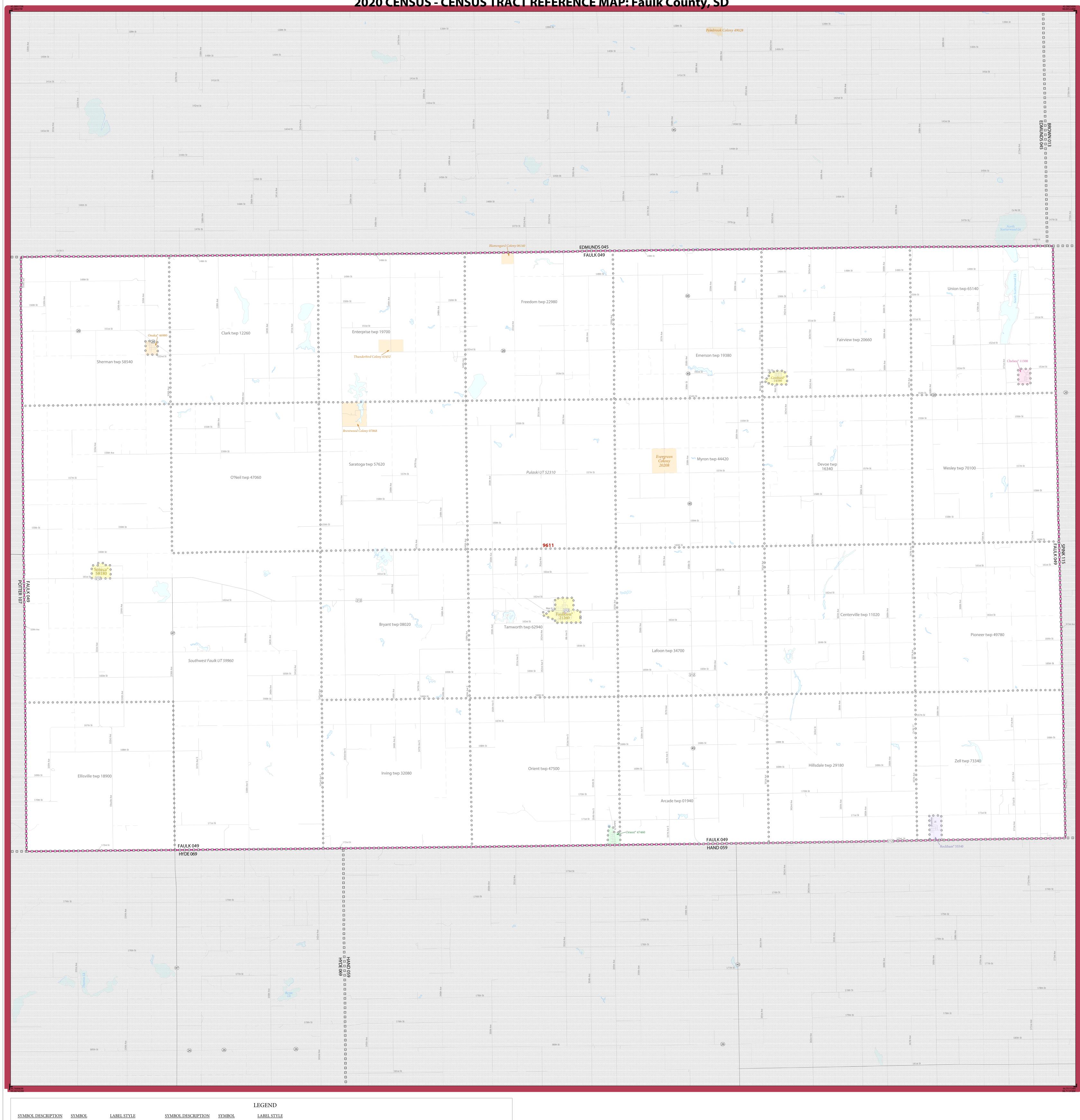


United States°



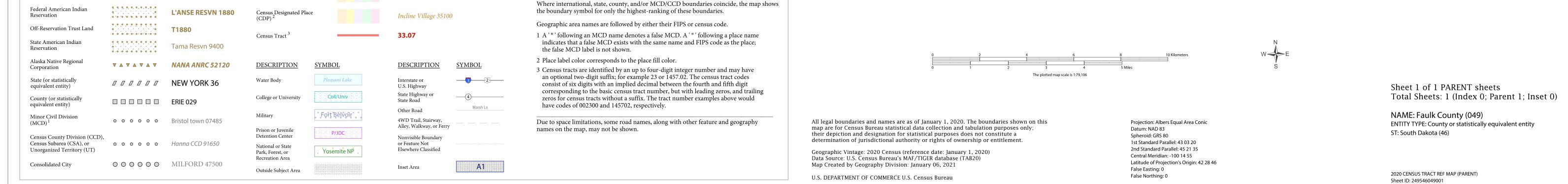
Incorporated Place ^{1,2} Davis 18100



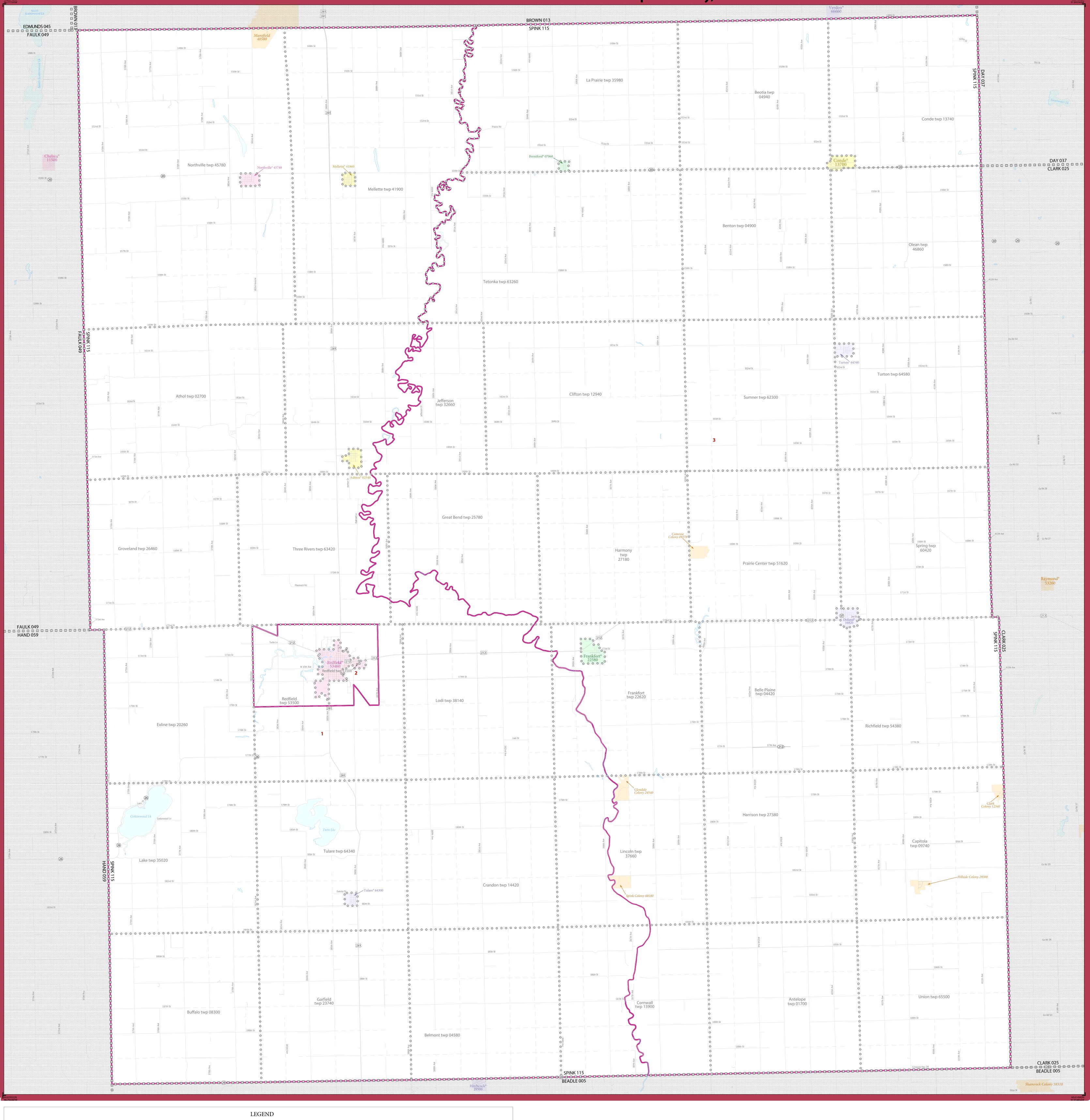


2020 CENSUS - CENSUS TRACT REFERENCE MAP: Faulk County, SD

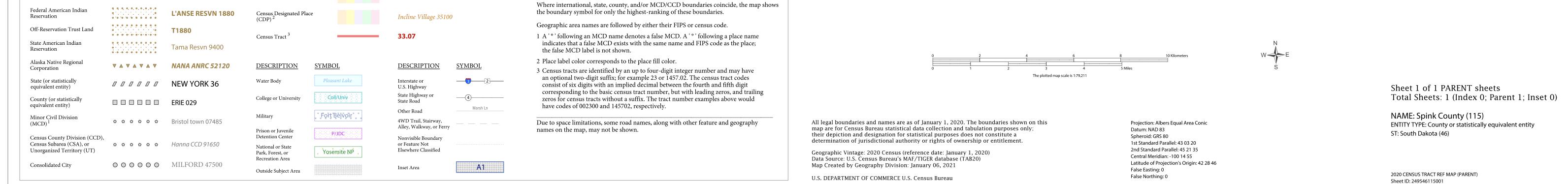
☆☆☆☆☆ CANADA Davis 18100 Incorporated Place 1,2 International



2020 CENSUS - CENSUS TRACT REFERENCE MAP: Spink County, SD



United States°



PUBLIC DISCLOSURE

April 3, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BankNorth Certificate Number: 8387

340 Main Street Arthur, North Dakota 58006

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

> 1100 Walnut Street, 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.

TABLE OF CONTENTS

INSTITUTION RATING	. 1
DESCRIPTION OF INSTITUTION	. 1
DESCRIPTION OF ASSESSMENT AREAS	. 2
SCOPE OF EVALUATION	. 3
CONCLUSIONS ON PERFORMANCE CRITERIA	. 4
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	. 9
NORTH DAKOTA	10
DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH DAKOTA	10
SCOPE OF EVALUATION – NORTH DAKOTA	10
CONCLUSIONS ON PERFORMANCE CRITERIA IN NORTH DAKOTA	10
NONMETROPOLITAN NORTH DAKOTA – Full-Scope Review	11
METROPOLITAN NORTH DAKOTA – Full-Scope Review	15
SOUTH DAKOTA – Full-Scope Review	20
DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA	20
SCOPE OF EVALUATION – SOUTH DAKOTA	21
CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTH DAKOTA	22
APPENDICES	25
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA	25
SUMMARY OF RATINGS FOR RATED AREAS	26
GLOSSARY	27

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated <u>Satisfactory</u>.

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.

The Lending Test is rated <u>Satisfactory</u>.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and the credit needs of the assessment areas.
- The bank made a majority of its small farm and small business loans within its assessment areas.
- The geographic distribution of small farm and small business loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects reasonable penetration among farms and businesses of different revenue sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated <u>Satisfactory</u>.

• The institution's community development performance demonstrates adequate responsiveness to the needs of its assessment areas through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities in the assessment areas.

DESCRIPTION OF INSTITUTION

BankNorth is headquartered in Arthur, North Dakota, and is owned by First Financial Corporation, a one-bank holding company. The bank is a part of a chain banking organization, which consists of three financial institutions operating in North Dakota, South Dakota, and Minnesota. BankNorth received a Satisfactory rating at its previous FDIC Performance Evaluation dated April 6, 2020, which was based on Interagency Intermediate Small Institution Examination Procedures. The institution continues to operate from eight locations in North Dakota and two locations in South Dakota. No merger or acquisition activities occurred since the previous evaluation, and no branches were opened or closed.

The bank offers various loan products, including agricultural, commercial, home mortgage, and consumer loans. Agricultural lending is the primary business focus, followed by commercial

lending. BankNorth also participates in special loan programs designed to assist small businesses and farms, such as those through Bank of North Dakota, Small Business Administration (SBA), and Farm Service Agency. The bank originated 1,217 loans totaling \$32.2 million though the SBA's Paycheck Protection Program (PPP), which assisted small businesses and farms struggling with the impact of the Coronavirus pandemic. Further, BankNorth originates short-term home mortgage loans and maintains a mortgage referral arrangement with a third party to provide an avenue for longer-term financing and special programs. The bank also provides a variety of standard deposit products, including checking, savings, and certificates of deposit accounts. Finally, alternative banking services include 10 cash-dispensing ATMs, online and mobile banking, mobile check deposit, and electronic bill pay.

As of December 31, 2022, BankNorth reported total assets of \$515.9 million, total loans of \$427.5 million, and total deposits of \$454.5 million. The following table illustrates the loan portfolio distribution. Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the credit needs of its assessment areas.

Loan Portfolio Distribution as of 12/31/2022						
Loan Category	\$(000s)	%				
Construction, Land Development, and Other Land Loans	2,564	0.6				
Secured by Farmland	180,036	42.1				
Secured by 1-4 Family Residential Properties	12,437	2.9				
Secured by Multifamily (5 or more) Residential Properties	1,333	0.3				
Secured by Nonfarm Nonresidential Properties	29,048	6.8				
Total Real Estate Loans	225,418	52.7				
Commercial and Industrial Loans	44,384	10.4				
Agricultural Production and Other Loans to Farmers	149,074	34.9				
Consumer Loans	4,988	1.1				
Obligations of State and Political Subdivisions in the U.S.	1,660	0.4				
Other Loans	395	0.1				
Lease Financing Receivable (net of unearned income)	1,542	0.4				
Less: Unearned Income	0	0.0				
Total Loans	427,461	100.0				
Source: Reports of Condition and Income						

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires financial institutions to define one or more assessment areas within which its CRA performance will be evaluated. BankNorth has designated three assessment areas, two in North Dakota and one in South Dakota. Therefore, the bank will receive State ratings for both North Dakota and South Dakota. The North Dakota assessment areas include: Nonmetropolitan North Dakota and Metropolitan North Dakota. The North Dakota. The North Dakota South Dakota Assessment areas in further Area is the sole assessment area in South Dakota. The assessment areas are discussed in further detail under the applicable State sections of the evaluation.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated April 6, 2020, to the current evaluation dated April 3, 2023. Examiners used Intermediate Small Institution Examination Procedures to evaluate BankNorth's CRA performance. These procedures include two tests: the Lending Test and the Community Development Test. Banks must achieve at least a Satisfactory rating under each test to obtain an overall Satisfactory rating. Refer to the Appendices for information on each test.

Examiners used full-scope examination procedures to assess the bank's performance in each assessment area. To assess overall performance, examiners gave greater weight to the bank's performance in North Dakota, specifically the Nonmetropolitan North Dakota Assessment Area, since this is where the majority of bank activity occur. The following table provides a breakdown of loans, deposits, and branches by assessment area.

Assessment Area Breakdown of Loans, Deposits, and Branches						
A	Loa	ns	Depo	osits	Branches	
Assessment Area	\$(000s)	%	\$(000s)	%	#	%
Nonmetropolitan North Dakota	195,192	45.7	212,605	46.8	5	50.0
Metropolitan North Dakota	125,836	29.4	162,314	35.7	3	30.0
North Dakota Subtotal	321,028	75.1	374,919	82.5	8	80.0
Nonmetropolitan South Dakota	106,433	24.9	79,624	17.5	2	20.0
South Dakota Subtotal	106,433	24.9	79,624	17.5	2	20.0
Total	427,461	100.0	454,543	100.0	10	100.0
Source: Bank Data	•		•			•

Activities Reviewed

As noted earlier, the bank's primary lending focus is agricultural lending, followed by commercial lending. This conclusion considered the bank's business strategy, the volume of loans originated, renewed, extended, or purchased during the evaluation period, and data from Reports of Condition and Income. Bank records and management indicated that the lending focus and product mix remained relatively consistent throughout the evaluation period.

For the Lending Test, examiners analyzed small farm and small business loans originated, renewed, extended, or purchased in 2022, using data from the bank's loan download. These loans were considered representative of BankNorth's lending activity during the entire evaluation period. It should be noted that a number of loans were removed from the Lending Test and considered under the Community Development Test at the bank's request. Examiners reviewed the entire universe of small farm and small business loans to assess the bank's performance under the Assessment Area Concentration criterion. Specifically, examiners reviewed 667 small farm loans totaling \$101.3 million and 173 small business loans totaling \$21.7 million.

For the Geographic Distribution criterion, examiners reviewed all small farm and small business loans for 2022 that were located in the Metropolitan North Dakota and the Nonmetropolitan South Dakota assessment areas. This criterion was not evaluated for the Nonmetropolitan North Dakota Assessment Area, as it is comprised entirely of middle-income geographies. For the Borrower Profile criterion, examiners reviewed a sample of small farm and small business loans made inside the bank's assessment areas, as revenue information to evaluate the entire universe was not readily available. The samples included 78 small farm loans totaling \$9.0 million, and 61 small business loans totaling \$5.2 million.

D&B data for 2022 provided a standard of comparison for the small farm and small business lending performance. Since agricultural lending is the primary lending focus, the bank's small farm lending performance received greater weight for overall conclusions. While both the number and dollar volume of loans are presented, examiners emphasized performance by number of loans because the number of loans is a better indicator of the number of farms and businesses served. Finally, examiners did not review home mortgage loans since these loans comprise only 3.2 percent of the loan portfolio and are not a major focus of the bank.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior evaluation. Furthermore, qualified investments made prior to the evaluation period that remain outstanding were also considered.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

BankNorth demonstrated satisfactory performance under the Lending Test. The bank's performance under the Loan-to-Deposit Ratio, Assessment Area Concentration, Geographic Distribution, and Borrower Profile criteria support this conclusion. Further, the bank's overall performance is consistent with the conclusions for North Dakota and South Dakota.

Loan-to-Deposit Ratio

BankNorth's loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment areas. As shown in the following table, the bank's net loan-to-deposit ratio averaged 90.9 percent over the past 11 calendar quarters, which is comparable to the ratios of similarly-situated institutions. The comparable institutions were selected based on their asset size, branching structure, geographic location, and lending focus.

Loan-to-Deposit (LTD) Ratio Comparison						
BankTotal Assets as of 12/31/2022Average Net LTD Ratio (\$000s)						
BankNorth, Arthur, ND	515,937	90.9				
American Federal Bank, Fargo, ND	711,527	94.4				
Bank Forward, Fargo, ND	896,699	85.7				
Source: Reports of Condition and Income 6/30/202	20 - 12/31/2022					

Assessment Area Concentration

As detailed in the following table, BankNorth made a majority of its small farm and small business loans within its assessment areas.

]	Lending	Inside a	nd Outsi	de of the A	Assessment	Areas				
	ľ	Number of Loans				Dollar A					
Loan Category	Insi	de	Out	side	Total	Inside		Outside		Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Small Business	154	89.0	19	11.0	173	17,634	81.4	4,021	18.6	21,655	
Small Farm	586	87.9	81	12.1	667	86,377	85.3	14,887	14.7	101,264	
Source: Bank Data Due to rounding, totals m	ay not equal 1	00.0%		•		-	-		-		

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. The bank's reasonable performance in North Dakota and South Dakota supports this conclusion. Examiners focused on the percentage of loans in the low- and moderate-income census tracts, as applicable. Detailed discussion of the bank's performance under this criterion is included in the rated areas and individual assessment areas sections of this evaluation.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes and individuals of different income levels. The bank's reasonable performance in North Dakota and South Dakota supports this conclusion. Examiners focused on the percentage of loans to farms and businesses with gross annual revenues of \$1 million or less. Detailed discussion of the bank's performance under this criterion is included in the rated areas and individual assessment areas sections of this evaluation.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

BankNorth's performance under the Community Development Test is Satisfactory. The institution demonstrated adequate responsiveness to the community development needs in its assessment areas through community development loans, qualified investments, and community development

services. Examiners considered the bank's capacity and the need and availability of such opportunities. Since the bank was responsive to the community development needs of its assessment areas, community development activities benefitting the broader statewide or regional areas were also considered in the analysis; however, these activities received less weight. The bank's overall performance is consistent with the conclusions for North Dakota and South Dakota.

Community Development Loans

BankNorth originated 1,159 community development loans totaling \$45.2 million during the evaluation period. This includes 1,100 loans totaling \$27.6 million originated under the PPP related to the COVID-19 pandemic that qualified as community development loans. The volume of community development loans represents 8.8 percent of total assets and 10.7 percent of net loans as of December 31, 2022. When examiners exclude the PPP loans from the bank's analysis, the bank's performance represents 3.4 percent of total assets and 4.2 percent of net loans. This is up from 1.9 percent of total assets and 2.2 percent of net loans at the prior evaluation.

Examiners compared the bank's level of community development lending to three similarly situated institutions, which revealed that the bank's level of community development loans is reasonable in comparison to these institutions. For comparison purposes, PPP loans were excluded, and these institutions' community development loans ranged from 0.7 percent to 2.8 percent of total assets and 0.9 percent to 4.5 percent of net loans.

Since BankNorth was responsive to the community development needs of its assessment areas, the institution received credit for community development loans that benefited a broader statewide area, which are discussed under the applicable State section of the evaluation. In addition, the bank received credit for 7 community development loans totaling \$108,000 that benefited the regional area. The following tables show community development lending activity by assessment area and year.

	Co	mmunity D	evelop	ment Lend	ing by A	Assessment	Area			
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nonmetropolitan North Dakota	1	150	0	0	65	2,268	467	14,354	533	16,772
Metropolitan North Dakota	0	0	0	0	231	9,687	32	6,449	263	16,136
Nonmetropolitan South Dakota	0	0	0	0	178	3,562	102	6,817	280	10,379
Statewide North Dakota	0	0	0	0	22	403	5	150	27	553
Statewide South Dakota	0	0	0	0	31	590	18	681	49	1,271
Regional	0	0	0	0	7	108	0	0	7	108
Total	1	150	0	0	534	16,618	624	28,451	1,159	45,219
Source: Bank Data	•			•	•	•	•	•	•	

		Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
Activity Year	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
2020 (Partial)	0	0	0	0	194	5,466	230	10,947	424	16,413	
2021	1	150	0	0	338	10,229	376	13,413	715	23,792	
2022	0	0	0	0	1	105	17	3,866	18	3,971	
2023 (YTD)	0	0	0	0	1	818	1	225	2	1,043	
Total	1	150	0	0	534	16,618	624	28,451	1,159	45,219	

Qualified Investments

BankNorth made 36 qualified investments totaling \$1.9 million during the evaluation period representing 0.4 percent of total assets and 4.5 percent of total securities as of December 31, 2022. This is a similar level to the prior evaluation where there were 36 qualified investments totaling \$1.2 million, representing 0.3 percent of total assets and 15.2 percent of total securities. Of the 36 qualified investments, 1 investment totaling \$140,000 was made during a prior evaluation period but was outstanding at the start of this evaluation. In addition, 30 qualified investments were donations totaling \$83,000. Examiners compared the bank's level of qualified investments to 3 similarly situated institutions. The similarly situated institutions' qualified investments ranged from 0.4 percent to 1.0 percent of total assets and 2.3 to 10.3 percent of total securities.

Since the institution was responsive to the community development needs of its assessment areas, it received credit for qualified investments that were made in a broader statewide area, which are discussed under the applicable State section of the evaluation. The following tables show the bank's qualified investments by assessment area and year.

		Qualifie	ed Inve	stments by	Assess	ment Area				
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nonmetropolitan North Dakota	0	0	2	1	1	0	10	1,225	13	1,226
Metropolitan North Dakota	0	0	13	49	0	0	0	0	13	49
Nonmetropolitan South Dakota	0	0	6	15	0	0	2	3	8	18
Statewide North Dakota	1	142	0	0	0	0	1	500	2	642
Statewide South Dakota	0	0	0	0	0	0	0	0	0	0
Total	1	142	21	65	0	0	13	1,728	36	1,935
Source: Bank Data	•	•						•		•

Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	142	0	0	0	0	0	0	1	142
2020 (Partial)	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	1	500	1	500
2022	0	0	0	0	0	0	4	1,210	4	1,210
2023 (YTD)	0	0	0	0	0	0	0	0	0	0
Subtotal	1	142	0	0	0	0	5	1,710	6	1,852
Qualified Grants & Donations	0	0	21	65	1	0	8	18	30	83
Total	1	142	21	65	1	0	13	1,728	36	1,935

Community Development Services

BankNorth representatives provided 126 instances of financial expertise or technical assistance to various community development-related organizations during the evaluation period. This is an increase from 111 instances at the prior evaluation. When comparing this activity to other banks, considering the opportunities available and branching, BankNorth's performance demonstrated excellent responsiveness to the needs of its assessment areas. The bank's level of community development services exceeds the level of the three similarly-situated institutions. The comparable institutions reported between 39 and 45 community development services during similar evaluation periods. The tables below summarize the distribution of community development services by assessment area and by year.

Community Development Services by Assessment Area							
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals		
	#	#	#	#	#		
Nonmetropolitan North Dakota	0	1	25	24	50		
Metropolitan North Dakota	3	16	29	0	48		
Nonmetropolitan South Dakota	1	4	5	5	15		
Statewide North Dakota	0	4	0	9	13		
Statewide South Dakota	0	0	0	0	0		
Total	4	25	59	38	126		
Source: Bank Data			·	· · · ·			

Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals	
v	#	#	#	#	#	
2020 (Partial)	1	6	16	12	35	
2021	1	6	16	10	33	
2022	1	7	15	10	33	
2023 (YTD)	1	6	12	6	25	
Total	4	25	59	38	126	

In addition to community development services, BankNorth offers alternative banking services that are readily accessible throughout all assessment areas, including to low- and moderate-income individuals. These include services such as online and mobile banking, mobile check deposit, and bill pay, among others. Further, the bank operates four branches and four ATMs in distressed and underserved census tracts and one branch and one ATM in an underserved census tract.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

NORTH DAKOTA

CRA RATING FOR NORTH DAKOTA: SATISFACTORY

The Lending Test is rated: <u>Satisfactory</u> The Community Development Test is rated: <u>Satisfactory</u>

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH DAKOTA

BankNorth has designated two assessment areas in North Dakota, the Nonmetropolitan North Dakota Assessment Area and the Metropolitan North Dakota Assessment Area. These Areas are described in further detail within the individual assessment area sections that follow.

SCOPE OF EVALUATION – NORTH DAKOTA

Examiners reviewed the bank's small farm and small business lending performance, as well as community development activities, for both North Dakota assessment areas. As noted previously, the Nonmetropolitan North Dakota Assessment Area received more weight when arriving at the State rating. Refer to the overall Scope of Evaluation section for additional information.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NORTH DAKOTA

LENDING TEST

BankNorth demonstrated reasonable performance under the Lending Test in North Dakota. The bank's geographic distribution and borrower profile performance support this conclusion. Further, the bank's performance is consistent with the conclusions for both assessment areas.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout North Dakota. Reasonable performance was noted in the Metropolitan North Dakota Assessment Area. The Nonmetropolitan North Dakota Assessment Area does not include any low- and moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated for the Nonmetropolitan North Dakota Assessment Area.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes. The performance in the Metropolitan North Dakota Assessment Area was excellent. The performance in the Nonmetropolitan North Dakota Assessment area was reasonable, which received greater weight.

COMMUNITY DEVELOPMENT TEST

BankNorth demonstrated adequate responsiveness to the community development needs in the North Dakota assessment areas through community development loans, qualified investments, and community services, considering the institution's capacity and the need and availability of such

opportunities in the assessment areas. This conclusion is supported by the bank's adequate performance in both assessment areas.

Community Development Loans

The institution originated 823 community development loans totaling \$33.5 million in the North Dakota assessment areas and broader statewide area, which accounts for the majority of the bank's community development lending at 74.0 percent by dollar. This includes 777 PPP loans totaling \$19.8 million, of which 27 PPP loans totaling \$554,000 benefited the broader statewide area. Details regarding the level of community development lending activity for each assessment area within North Dakota are provided under the individual assessment area sections.

Qualified Investments

The bank made 28 qualified investments totaling \$1.9 million in North Dakota. This includes 2 qualified investments totaling \$642,000 that benefited the broader statewide area. Details regarding the level of qualified investment activity for each assessment area in North Dakota are provided under the individual assessment area sections.

Community Development Services

Bank representatives provided 111 instances of financial expertise or technical assistance to community development organizations in North Dakota, including 13 services that benefited the broader statewide area. This reflects 88.1 percent of all community development services offered by the institution, during the evaluation period. Details regarding the level of community development services for each assessment area within North Dakota are provided under the individual assessment area sections.

NONMETROPOLITAN NORTH DAKOTA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN NORTH DAKOTA

The Nonmetropolitan North Dakota AA is comprised of all of Dickey, LaMoure, Ransom, and Sargent counties, as well as Census Tracts 9679 and 9680 in Barnes County, Census Tract 9707 in Richland County, and Census Tract 9672 in Stutsman County. All 14 census tracts in the assessment area are middle income according to the 2020 U.S. Census. Further, all of the census tracts in LaMoure, Ransom, and Sargent counties were designated as distressed and underserved throughout the review period. Census Tracts 9732 and 9733 in Dickey County were designated as underserved throughout the review period, and Census Tract 9707 in Richland County was designated as underserved in 2022.

There were no changes to the assessment area since the previous evaluation; however, there were slight changes related to the 2020 U.S. Census. According to the 2015 American Community Survey (ACS), the Nonmetropolitan North Dakota Assessment Area was comprised of 1 moderate-income, 12 middle-income, and 1 upper-income census tracts. The 2015 ACS data was used when reviewing community development activities from 2020 and 2021.

The bank operates five offices in the assessment area and maintains ATMs at each facility. The branches and ATMs in Enderlin, LaMoure, Lisbon, and Marion are located in census tracts designated as distressed and underserved throughout the review period. In addition, the Oakes branch is located in a census tract designated as underserved throughout the review period.

Economic and Demographic Data

The following table illustrates select demographic characteristics of the assessment area.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	0.0	100.0	0.0	0.0
Population by Geography	27,681	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	14,432	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	9,381	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	2,558	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,493	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	3,740	0.0	0.0	100.0	0.0	0.0
Farms by Geography	1,048	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	7,744	16.1	18.8	27.5	37.6	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income Non-MSAs - ND		\$82,366	Median Housi	ng Value		\$131,104
			Median Gross	Rent		\$687
			Families Belo	w Poverty Le	evel	4.8%

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Competition

The Nonmetropolitan North Dakota Assessment Area is moderately competitive for financial services. According to Reports of Condition filed by financial institutions, 12 other banks with deposits ranging between \$1.7 million and \$206.5 million operate either a main office or a branch office within the assessment area.

Community Contact

As part of the evaluation process, examiners contact third parties to assist in identifying the credit needs of the assessment areas. This information helps determine whether local financial institutions are responsive to these needs. Examiners reviewed a community contact interview previously conducted with an individual representing an agricultural organization in the area.

The contact stated that the area is fairly dependent on the agricultural economy and indicated that it is common for farm operators to have off-farm income. The contact further noted that the area has

not been severely impacted by the effects of the Coronavirus pandemic, as major employers did not have significant layoffs or closures. Lastly, the contact indicated that financial institutions are active in the assessment area and noted that competition is more significant than in prior years.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that agricultural loans represent the assessment area's primary credit need, followed by commercial loans. Further, community development needs include affordable housing, community services, economic development, and revitalization/stabilization.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NONMETROPOLITAN NORTH DAKOTA

LENDING TEST

BankNorth demonstrated reasonable performance under the Lending Test in the Nonmetropolitan North Dakota Assessment Area. Reasonable performance under the Borrower Profile criteria supports this conclusion.

Geographic Distribution

The assessment area is comprised entirely of middle-income census tracts, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes. Reasonable small farm lending performance and excellent small business lending performance supports this conclusion. As previously noted, more weight was given to the bank's small farm lending.

Small Farm Loans

As illustrated in the next table, the distribution of borrowers reflects reasonable penetration among farms with gross annual revenues of \$1 million or less when compared to D&B data. Although lending to farms with revenues of \$1 million or less is below the comparable D&B data, there are several factors explaining the disparity. According to the 2017 Census of Agriculture data, 40.9 percent of the producers in the 7 counties that comprise the assessment area do not report farming as their primary occupation. Additionally, 46.1 percent of the farming operations did not report interest expense, which suggests that a large population of farms do not appear to have credit needs. This data indicates that many farms in the assessment area have off-farm income and may not need credit to finance farm operations.

Nonmetropolitan North Dakota Assessment Area								
Gross Revenue Level	% of Farms	#	%	\$(000s)	%			
<=\$1,000,000	98.0	31	81.6	3,283	69.1			
>\$1,000,000	1.4	6	15.8	1,400	29.5			
Revenue Not Available	0.6	1	2.6	70	1.5			
Total	100.0	38	100.0	4,753	100.0			

Small Business Loans

The distribution of sampled small business loans reflects excellent lending penetration to businesses with gross annual revenues of \$1 million or less. The following table indicates that the bank's lending performance to businesses with gross annual revenues of \$1 million or less exceeds demographic data.

Nonmetropolitan North Dakota Assessment Area								
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%			
<=\$1,000,000	83.3	19	95.0	1,820	98.9			
>\$1,000,000	3.5	1	5.0	20	1.1			
Revenue Not Available	13.2	0	0.0	0	0.0			
Total	100.0	20	100.0	1,840	100.0			

COMMUNITY DEVELOPMENT TEST

BankNorth demonstrated adequate responsiveness to the community development needs of the Nonmetropolitan North Dakota Assessment Area through community development loans, qualified investments, and community development services.

Community Development Loans

BankNorth originated 533 community development loans totaling \$16.8 million in the Nonmetropolitan North Dakota Assessment Area. This includes 498 PPP loans totaling \$11.7 million, which provided economic development or revitalization/stabilization support for the assessment area. Of the remaining 35 loans, 1 loan for \$150,000 promoted affordable housing, 2 loans totaling \$923,000 supported economic development, and 32 loans totaling \$4.0 million revitalized or stabilized distressed and/or underserved geographies.

Qualified Investments

The bank made 13 qualified investments totaling \$1.2 million in the Nonmetropolitan North Dakota Assessment Area, including 4 new investments totaling \$1.2 million, and 9 donations totaling approximately \$16,000. Of the 13 investments, 2 totaling approximately \$1,000 were to organizations that provide community services to low- and moderate-income individuals, 1 for less than \$1,000 was to an organization that supports economic development, and 10 totaling \$1.2 million were to organizations that provide revitalization or stabilization efforts for distressed and/or underserved geographies.

Community Development Services

Bank representatives provided 50 instances of financial expertise or technical assistance to community development organizations in the Nonmetropolitan North Dakota Assessment Area. Of these services, 1 was to an organization that provides community services to low- and moderate-income individuals, 25 were to organizations that promote economic development, and 24 were to organizations that promote revitalization for distressed and/or underserved geographies.

METROPOLITAN NORTH DAKOTA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN METROPOLITAN NORTH DAKOTA

The Metropolitan North Dakota Assessment Area includes all of Cass County, which comprises a portion of the Fargo, ND-MN Metropolitan Statistical Area (MSA), and Census Tracts 9703 and 9704 in Traill County, which is a contiguous nonmetropolitan county. According to the 2020 U.S. Census, the Metropolitan North Dakota Assessment Area consists of 46 CTs including 4 low-income, 9 moderate-income, 20 middle-income, and 13 upper-income geographies. Census Tracts 9703 and 9704 in Traill County were designated as underserved throughout the review period.

There were no changes to the assessment area since the previous evaluation; however, there were numerous changes related to the 2020 U.S. Census. Overall, 11 census tracts were added to the assessment area, all of which are in Cass County. Based on 2015 ACS data, the assessment area consisted of 9 moderate-income, 17 middle-income, and 8 upper-income census tracts, along with 1 census tract that did not have an income designation. As previously noted, 2015 ACS data was used when reviewing community development activities from 2020 and 2021.

The bank's main office in Arthur, as well as the branches in Buffalo and Casselton, are located in the Metropolitan North Dakota Assessment Area. All three offices, including an ATM at each location, are located in middle-income census tracts in Cass County.

Economic and Demographic Data

Bank management stated that the economy in eastern Cass County, where the City of Fargo is located, is strong and that the economy is more diverse than western Cass and southern Traill counties, which are more rural in nature. The economy in these areas are more dependent on the agriculture economy and related businesses. The following table illustrates select demographic characteristics of the assessment area.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	8.7	19.6	43.5	28.3	0.0
Population by Geography	187,655	6.2	18.3	43.4	32.1	0.0
Housing Units by Geography	85,148	8.4	23.0	44.8	23.7	0.0
Owner-Occupied Units by Geography	41,490	1.8	12.9	50.3	34.9	0.0
Occupied Rental Units by Geography	36,911	13.7	33.3	39.6	13.5	0.0
Vacant Units by Geography	6,747	20.6	29.0	39.5	10.9	0.0
Businesses by Geography	23,628	11.0	23.4	39.5	26.2	0.0
Farms by Geography	851	2.7	7.6	66.5	23.1	0.0
Family Distribution by Income Level	43,887	18.3	18.5	22.8	40.4	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income MSA - 22020 Fargo, ND-MN MSA		\$90,450	Median Housi	ng Value		\$228,937
Median Family Income Non-MSAs - ND		\$82,366	Median Gross	Rent		\$828
			Families Belo	w Poverty Le	evel	5.9%

(*) The NA category consists of geographies that have not been assigned an income classification.

Competition

The Metropolitan North Dakota Assessment Area is highly competitive for financial services. According to Reports of Condition filed by financial institutions, 27 other banks with deposits ranging between \$25.9 million and \$3.6 billion operate either a main office or a branch office within the assessment area. This data also indicates that the 28 financial institutions operate 77 branches in the assessment area.

Community Contact

Examiners reviewed a community contact interview previously conducted with an individual representing an agricultural organization in the area. The contact stated that the area's economy is very similar to most of rural North Dakota, as it is highly dependent on the agriculture and agriculture-related businesses. The contact has noticed an increase in the number of beginning farmers needing financing. Overall, the economy is doing well, and availability of affordable housing is adequate.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and the demographic and economic data, examiners determined that agricultural, commercial, and home mortgage loans represent primary credit needs in the assessment area. Community development needs include community services, economic development, and revitalization/stabilization.

CONCLUSIONS ON PERFORMANCE CRITERIA IN METROPOLITAN NORTH DAKOTA

LENDING TEST

BankNorth demonstrated reasonable performance under the Lending Test in the Metropolitan North Dakota Assessment Area. Reasonable performance under the Geographic Distribution criterion and excellent performance under the Borrower Profile criterion supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. This conclusion is supported by the bank's small farm and small business lending performance.

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. Although lending in the low- and moderate-income census tracts slightly lags D&B data, examiners noted that these census tracts are all located in the City of Fargo, where farming activity is rather limited and there is significant lending competition. Further, the bank's offices in the Metropolitan North Dakota Assessment are located in the rural portion of Cass County, where agricultural lending is more prevalent. Given this information, the geographic distribution of small farms loans is reasonable.

Geographic Distribution of Small Farm Loans									
Metropolitan North Dakota Assessment Area									
Tract Income Level	% of Farms	#	%	\$(000s)	%				
Low	2.7	0	0.0	0	0.0				
Moderate	7.6	1	0.6	80	0.4				
Middle	66.5	153	98.7	20,298	98.9				
Upper	23.1	1	0.6	150	0.7				
Not Available	0.0	0	0.0	0	0.0				
Totals	100.0	155	100.0	20,528	100.0				

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. BankNorth's performance in the assessment area's low- and moderate-income census tracts lags D&B data. However, as noted previously, all of the low- and moderate-income census tracts are located in the City of Fargo, where there is substantial competition for small business loans. Furthermore, the bank's nearest office, in Casselton, is approximately 25 miles from Fargo. Given this information, the geographic distribution of small business loans is reasonable. See the following table for additional information.

Geographic Distribution of Small Business Loans Metropolitan North Dakota Assessment Area							
Tract Income Level	% of Businesses	#	%	\$(000s)	%		
Low	11.0	0	0.0	0	0.0		
Moderate	23.4	1	1.6	30	0.4		
Middle	39.5	58	90.6	6,688	91.3		
Upper	26.2	5	7.8	607	8.3		
Not Available	0.0	0	0.0	0	0.0		
Totals	100.0	64	100.0	7,325	100.0		

Borrower Profile

BankNorth's lending performance demonstrates excellent penetration among farms and businesses of different revenue sizes. This conclusion is supported by the bank's small farm and small business lending performance.

Small Farm Loans

The distribution of borrowers reflects excellent penetration among farms with gross annual revenues of \$1 million or less. The bank's performance is comparable to D&B data. Furthermore, the 2017 Census of Agriculture data shows that 39.1 percent of producers in Cass and Traill counties report a primary occupation other than farming, and 42.5 percent of farm operations did not report having interest expenses. This information further supports that many farms in the assessment area have off-farm income and may not need credit to finance farm operations, and therefore, the bank's performance is excellent. See the following table for information.

Metropolitan North Dakota Assessment Area							
Gross Revenue Level	% of Farms	#	%	\$(000s)	%		
<=\$1,000,000	97.4	19	95.0	1,848	94.9		
>\$1,000,000	2.1	0	0.0	0	0.0		
Revenue Not Available	0.5	1	5.0	100	5.1		
Total	100.0	20	100.0	1,948	100.0		

Small Business Loans

As shown in the following table, the distribution of borrowers reflects excellent penetration among businesses with gross annual revenues of \$1 million or less when compared to D&B data.

Metropolitan North Dakota Assessment Area								
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%			
<=\$1,000,000	87.0	19	90.5	1,050	63.6			
>\$1,000,000	4.4	2	9.5	600	36.4			
Revenue Not Available	8.6	0	0.0	0	0.0			
Total	100.0	21	100.0	1,650	100.0			

COMMUNITY DEVELOPMENT TEST

BankNorth demonstrated adequate responsiveness to the community development needs of the Metropolitan North Dakota Assessment Area through community development loans, qualified investments, and community development services.

Community Development Loans

BankNorth originated 263 community development loans totaling \$16.1 million in the Metropolitan North Dakota Assessment Area. This includes 252 PPP loans totaling \$7.6 million, which provided economic development or revitalization/stabilization support for the assessment area. Of the remaining 11 loans, 1 loan for \$3.7 million promoted economic development and 10 loans totaling \$4.8 million revitalized or stabilized underserved geographies.

Qualified Investments

The bank made 13 qualified investments totaling \$49,000 in the Metropolitan North Dakota Assessment Area. All qualified investments were to organizations that provide community services to low- and moderate-income individuals.

Community Development Services

Bank representatives provided 48 instances of financial expertise or technical assistance to community development organizations in the Metropolitan North Dakota Assessment Area. Of these services, 3 were to organizations that promote affordable housing, 16 were to organizations that provide community services to low- and moderate-income individuals, and 29 were to organizations that promote economic development.

SOUTH DAKOTA – Full-Scope Review

CRA RATING FOR SOUTH DAKOTA: SATISFACTORY

The Lending Test is rated: <u>Satisfactory</u> The Community Development Test is rated: <u>Satisfactory</u>

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA

BankNorth has designated one assessment area in South Dakota. The Nonmetropolitan South Dakota Assessment Area consists of all of Brown and Faulk counties, as well as Census Tract 9621 in Edmunds County, and Census Tracts 1 and 2 in Spink County. According to the 2020 U.S. Census, the assessment area consists of 1 moderate-income, 7 middle-income, and 4 upper-income geographies. Two census tracts were designated as distressed and underserved throughout the review period, and a third tract was designated as distressed and underserved in 2022.

The assessment area has not changed since the prior evaluation; however, there were slight adjustments with the 2020 U.S. Census. The 2015 ACS data was used when reviewing community development activities from 2020 and 2021. According to 2015 ACS data, the assessment area contained 2 moderate-income, 5 middle-income, and 5 upper-income census tracts.

The bank continues to operate two branches and two ATMs in the assessment area. The Aberdeen office and ATM are located in a middle-income geography, while the Warner office and ATM are in an upper-income geography.

Economic and Demographic Data

A significant portion of the population is in the City of Aberdeen. Management indicated that outside of Aberdeen, the assessment area is largely rural and dependent on agriculture. The following table illustrates select demographic characteristics of the assessment area.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	58.3	33.3	0.
Population by Geography	47,242	0.0	4.8	51.0	44.2	0.
Housing Units by Geography	22,791	0.0	6.0	51.3	42.7	0.0
Owner-Occupied Units by Geography	13,518	0.0	2.4	48.6	49.0	0.0
Occupied Rental Units by Geography	6,468	0.0	12.6	54.7	32.7	0.0
Vacant Units by Geography	2,805	0.0	8.1	56.7	35.2	0.
Businesses by Geography	6,036	0.0	14.7	41.5	43.8	0.0
Farms by Geography	823	0.0	1.2	47.3	51.5	0.0
Family Distribution by Income Level	12,011	14.6	15.9	23.0	46.5	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income Non-MSAs - SD		\$73,083	Median Housi	ng Value		\$162,96
			Median Gross	Rent		\$687
			Families Belo	w Poverty Le	evel	6.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Competition

The Nonmetropolitan South Dakota Assessment Area is moderately competitive for financial services. According to Reports of Condition filed by financial institutions, 15 other financial institutions with deposits ranging between \$17.9 million and \$751.5 million operate a main office or branch within the assessment area. This data also indicates that the 16 financial institutions operate 25 branches in the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that agricultural and commercial loans are primary credit needs in the assessment area. Further, community development needs include affordable housing, community services, economic development, and revitalization/stabilization.

SCOPE OF EVALUATION – SOUTH DAKOTA

A full-scope review was conducted for the Nonmetropolitan South Dakota Assessment Area. For the Lending Test, examiners reviewed small farm and small business loans. Community development activities were also reviewed for the assessment area. Refer to the overall Scope of Evaluation section for additional information.

CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTH DAKOTA

LENDING TEST

BankNorth demonstrated reasonable performance under the Lending Test in the Nonmetropolitan South Dakota Assessment Area. The bank's reasonable geographic distribution and borrower profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's performance is primarily supported by the reasonable small farm lending performance. While the small business lending demonstrated poor dispersion, more weight was given to the small farm lending performance.

Small Farm Loans

As depicted in the following table, the geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area when compared to D&B data.

Geographic Distribution of Small Farm Loans									
Nonmetropolitan South Dakota Assessment Area									
Tract Income Level	% of Farms	#	%	\$(000s)	%				
Low	0.0	0	0.0	0	0.0				
Moderate	1.2	0	0.0	0	0.0				
Middle	47.3	90	61.6	12,551	53.0				
Upper	51.5	56	38.4	11,115	47.0				
Not Available	0.0	0	0.0	0	0.0				
Totals	100.0	146	100.0	23,666	100.0				

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the assessment area. As shown in the table below, no small business loans were originated in moderate-income geographies. Therefore, the performance lags the comparable D&B data. However, there is only one moderate-income census tract, which is located in Aberdeen. BankNorth has one loan officer at the Aberdeen branch, and the bank has a relatively small presence in Aberdeen, given the level of competition. Considering these factors, the bank's performance is mitigated.

Geographic Distribution of Small Business Loans Nonmetropolitan South Dakota Assessment Area								
Tract Income Level	% of Businesses	#	%	\$(000s)	%			
Low	0.0	0	0.0	0	0.0			
Moderate	14.7	0	0.0	0	0.0			
Middle	41.5	13	37.1	1,532	35.9			
Upper	43.8	22	62.9	2,732	64.1			
Not Available	0.0	0	0.0	0	0.0			
Totals	100.0	35	100.0	4,264	100.0			
Source: 2022 D&B Data; Ban. Due to rounding, totals may no				•				

Borrower Profile

The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes. Reasonable small farm and small business lending performance supports this conclusion.

Small Farm Loans

The distribution of borrowers reflects reasonable penetration among farms with gross annual revenues of \$1 million or less when compared to D&B data. Although lending to farms with revenues of \$1 million or less is below the comparable D&B data, there are several factors explaining the disparity. According to the 2017 Census of Agriculture data, 40.9 percent of the producers in Brown, Edmunds, Faulk, and Spink counties do not report farming as their primary occupation. Additionally, 45.9 percent of the farming operations did not report interest expense, which suggests that a large population of farms do not appear to have credit needs. This data indicates that many farms in the assessment area have off-farm income and may not need credit to finance farm operations.

Nonmetropolitan South Dakota Assessment Area								
Gross Revenue Level	% of Farms	#	%	\$(000s)	%			
<=\$1,000,000	97.0	17	85.0	1,843	78.0			
>\$1,000,000	2.2	2	10.0	500	21.2			
Revenue Not Available	0.9	1	5.0	20	0.8			
Total	100.0	20	100.0	2,363	100.0			

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses with gross annual revenues of \$1 million or less when compared to D&B data, which is depicted in the following table.

Nonmetropolitan South Dakota Assessment Area							
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%		
<=\$1,000,000	84.2	15	75.0	1,124	66.4		
>\$1,000,000	4.0	5	25.0	568	33.6		
Revenue Not Available	11.8	0	0.0	0	0.0		
Total	100.0	20	100.0	1,692	100.0		

COMMUNITY DEVELOPMENT TEST

BankNorth demonstrated adequate responsiveness to the community development needs of the Nonmetropolitan South Dakota Assessment Area through community development loans, qualified investments, and community development services. This conclusion is mainly supported by the level of community development lending and services. Qualified investment activity is limited.

Community Development Loans

The institution originated 329 community development loans totaling \$11.7 million in the Nonmetropolitan South Dakota Assessment Area and broader statewide area. This includes 316 PPP loans totaling \$7.7 million, of which 27 PPP loans totaling \$1.3 million benefited the broader statewide area. The PPP loans provided economic development and revitalization or stabilization support for the assessment area and statewide South Dakota. The remaining 13 loans totaling \$4.0 million revitalized or stabilized distressed and underserved geographies.

Qualified Investments

The bank made 8 qualified investments totaling \$18,000 in the Nonmetropolitan South Dakota Assessment Area. All qualified investments were donations to organizations that provide community services to low- and moderate-income individuals or support revitalization or stabilization in distressed and underserved areas.

Community Development Services

Bank representatives provided 15 instances of financial expertise or technical assistance to community development organizations in the Nonmetropolitan South Dakota Assessment Area. Of these services, 1 was to an organization that promotes affordable housing, 4 were to organizations that provide community services to low- and moderate-income individuals, 5 were to organizations that promote economic development, and 5 were to organizations to support revitalization or stabilization in distressed and underserved geographies.

APPENDICES

INTERMEDIATE 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:

- 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).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
North Dakota	Satisfactory	Satisfactory	Satisfactory
South Dakota	Satisfactory	Satisfactory	Satisfactory

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.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI

facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) has as its primary purpose community development;
- (2) Is related to the provision of <u>financial</u> services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

(1) An unemployment rate of at least 1.5 times the national average;

- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

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

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 Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middleincome geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs. **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.