PUBLIC DISCLOSURE

June 22, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank Minnesota
Charter Number: 1794

226 West Nassau Street
St. Peter, MN 56082

Office of the Comptroller of the Currency

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

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

Contents

Overall CRA Rating

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

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of the bank's loans are inside its assessment areas (AAs).
- The bank's distribution of home mortgage and business loans throughout geographies of different income levels is reasonable.
- The bank's distribution of loans to businesses of different sizes and individuals of different income levels is reasonable.
- The bank did not receive any Community Reinvestment Act (CRA)-related complaints.
- Community development (CD) performance shows adequate responsiveness to AA needs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. The bank's LTD ratio averaged 85.52 percent over the 16 quarters since the previous CRA evaluation period. The bank's ratio gradually increased over the assessment period. The bank's quarterly LTD ratio ranged from a low of 75.34 percent in the first quarter of 2022 to a high of 88.70 percent in the second quarter of 2024. First National Bank Minnesota (FNB Minnesota) ranked second out of five similarly situated institutions. The LTD ratios for similarly situated institutions ranged from an average of 25.84 percent to 104.24 percent.

The following table shows the bank's LTD ratio compared to similar situated institutions:

Loan-to-Deposit Ratio		
Institution	**Total Assets ($000s)**	**Average LTD Ratio (%)**
Community Bank Mankato	542,715	104.24
First National Bank Minnesota	**451,141**	**85.52**
Hometown Bank	663,179	67.61
Cornerstone State Bank	241,969	63.37
Progrowth Bank	411,728	25.84
Source: Call Report data from March 31, 2022, to December 31, 2025		

Lending in Assessment Area

A substantial majority of the bank's loans were inside its AAs.

The bank originated and purchased 84.34 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2023-2025
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	137	86.71	21	13.29	158	27,786	84.04	5,276	15.96	33,062
Small Business	30	75.00	10	25.00	40	7,659	92.28	641	7.72	8,300
Total	**167**	**84.34**	**31**	**15.66**	**198**	**35,445**	**85.69**	**5,917**	**14.31**	**41,362**
Source: 1/1/2023 - 12/31/2025 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

FNB Minnesota is a $451 million community bank headquartered in St. Peter, Minnesota (MN). FNB Minnesota is a single state institution and operates four branches in south central Minnesota located in Belle Plaine, Gaylord, Mankato, and St. Peter, MN. Each branch includes a 24-hour drive-up automated teller machine (ATM). The bank does not own or operate any deposit-taking ATMs. The bank did not open or close any branches since the last CRA examination. FNB Minnesota is 100 percent owned by Bancommunity Service Corporation (BSC), also headquartered in St. Peter, MN. As of December 31, 2025, BSC's total assets were $45.39 million. FNB Minnesota does not operate any subsidiaries or affiliates, nor has there been any merger or acquisition activity since the last CRA examination.

The bank has three AAs in the state of MN which include the Mankato metropolitan statistical area (MSA), the Minneapolis MSA, and the MN Non-MSA. The Mankato MSA is comprised of 23 census tracts (CTs) including 16 CTs in Blue Earth County and seven CTs in Nicollet County. The Minneapolis MSA is comprised of 64 CTs including 25 CTs in Carver County, seven CTs in Le Sueur County, and 32 CTs in Scott County. The MN Non-MSA is comprised of four CTs within Sibley County.

FNB Minnesota is a full-service community bank offering a variety of traditional loan and deposit products. As of December 31, 2025, the bank's loans and leases totaled $338 million or 75.1 percent of total assets. The loan portfolio by dollar value is comprised of 47.42 percent business loans, 27.90 percent home mortgage loans, 17.54 percent farm loans, and 7.14 percent consumer loans. Tier 1 capital totaled $41.7 million as of December 31, 2025.

The bank received a satisfactory rating at the prior CRA evaluation dated July 31, 2023. The bank does not have any legal, financial, or other factors that would impede the bank's ability to meet the credit needs of its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB Minnesota's CRA performance using intermediate small bank procedures. The time period for the LTD ratio analysis was January 1, 2022, to December 31, 2025. The complaint analysis period was from July 31, 2023, to December 31, 2025. The evaluation period for the lending test covered January 1, 2023, to December 31, 2025.

FNB Minnesota's primary loan products for each AA were determined by reviewing the total number and dollar volume of loan originations and purchases during the evaluation period. FNB Minnesota's primary products differ by AA. The primary products of the Mankato MSA and Minneapolis MSA include business loans and home mortgage loans. The primary product of the MN Non-MSA is home mortgage loans. We used HMDA data to analyze home mortgage lending. Examiners selected a sample of 20 business loans for the Minneapolis MSA and 20 business loans for the Mankato MSA. We then selected additional loans as needed to have sufficient information to analyze borrower and geographic distributions in the AAs. Business loans are compared to the 2025 Dunn & Bradstreet business data.

For the CD test, we reviewed CD loans, investments, and services submitted by bank management. The activities meeting the definition of CD are included in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on lending and community development in the state of Minnesota. The Minnesota state rating is based on FNB Minnesota's performance in the Mankato MSA, the Minneapolis MSA, and the MN Non-MSA. We evaluated the bank's lending performance using the following performance criteria: the LTD ratio, lending in the AAs, lending to borrowers of different income levels, distribution of loans to geographies of different income levels, and responses to CRA-related complaints. We evaluated the bank's community development performance using the following performance criteria: volume and amount of community development loans, volume of qualified investments, and level of service hours. Performance in the Mankato MSA carried the greatest weight, followed by the Minneapolis MSA, and lastly, the MN Non-MSA.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage and business loans throughout geographies of different income levels is reasonable.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is reasonable.
- The bank received no CRA-related complaints during the evaluation period.
- CD performance shows adequate responsiveness to AA needs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Minnesota

The Rating in the State of Minnesota is based on the performance within the bank's three AAs: Mankato MSA, Minneapolis MSA, and the MN Non-MSA.

Mankato MSA

The Mankato MSA consisted of Nicollet and Blue Earth counties. FNB Minnesota operated two full-service branches in the Mankato MSA, located in Mankato and St. Peter, MN. These two branches accounted for 57.88 percent of the bank's deposit base as of June 30, 2025. The Mankato MSA consisted of 23 CTs including six moderate-income, 14 middle-income, and three upper-income CTs.

Competition within the Mankato MSA is significant. The 2025 FDIC Market Share Report indicates FNB Minnesota ranked fifth among 19 deposit taking institutions with a market share of 6.28 percent. The top competitors by market share include Wells Fargo Bank, Community Bank Mankato, and Pioneer Bank with a combined market share of 44.11 percent.

The bank's primary lending focus in the Mankato MSA is business loans and home mortgage loans. Considering all loans originated and purchased in the Mankato MSA during the evaluation period, business loans represented 39.08 percent by number and 45.59 percent by dollar volume, and home mortgages represented 27.75 percent by number and 29.11 percent by dollar volume.

As a part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the Mankato MSA. One contact works for an economic development corporation that focuses on advancing business development including: talent growth, retention, and attraction of employees. The organization seeks to enhance general regional livability and advocates for the Mankato MSA marketplace. The contact identified a demand for business financing and various credit needs. The contact stated businesses typically seek out alternative financing given the current high interest rates. The contact additionally noted that single family houses are limited, and developments are well below projected needs. The contact stated employers are offering job opportunities in the area; however, the offers are declined due to lack of houses. The contact noted that the starter home's prices average increased significantly in the last few years, which is difficult for a low-income borrower to afford. We utilized another contact who works for a charity that invests in economic growth in Southern Minnesota including in the Mankato MSA. The contact identified the greatest credit needs in the area are entrepreneur support and startup business support, financing for affordable housing projects, and credit support for childcare businesses.

The following table provides information on the Mankato MSA demographic composition.

Assessment Area(s) - Mankato MSA						
						2023-2025
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	23	0.00	26.09	60.87	13.04	0.00
Population by Geography	103,566	0.00	25.37	60.72	13.92	0.00
Housing Units by Geography	42,391	0.00	26.54	60.29	13.18	0.00
Owner-Occupied Housing by Geography	25,590	0.00	16.23	68.82	14.96	0.00
Occupied Rental Units by Geography	13,621	0.00	44.04	45.60	10.36	0.00
Vacant Units by Geography	3,180	0.00	34.53	54.56	10.91	0.00
Businesses by Geography	3,682	0.00	24.80	63.39	11.81	0.00
Farms by Geography	405	0.00	4.94	91.11	3.95	0.00
Family Distribution by Income Level	23,861	20.51	17.51	24.35	37.62	0.00
Household Distribution by Income Level	39,211	23.35	16.99	17.83	41.84	0.00
Unemployment rate (%)	3.39	0.00	4.92	2.89	2.29	0.00
Households Below Poverty Level (%)	13.38	0.00	25.47	9.10	9.43	0.00
Median Family Income (31860 - Mankato, MN MSA)		$83,590			**Median Housing Value**	$186,700
Median Family Income (31860 - Mankato, MN MSA) for 2025		$104,700			**Median Gross Rent**	$895
					Families Below Poverty Level	6.81
FFIEC File - 2020 Census FFIEC File - 2024 Census 2025 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0%						

<u>Minneapolis MSA</u>

The Minneapolis MSA consisted of Carver, Le Sueur, and Scott counties. FNB Minnesota operated one full-service branch in the Minneapolis MSA, located in Belle Plaine. This branch accounted for 34.70 percent of the bank's deposit base as of June 30, 2025. The Minneapolis MSA consisted of 64 CTs including five moderate-income, 33 middle-income, and 26 upper-income CTs.

Competition within the Minneapolis MSA is significant. The 2025 FDIC Market Share Report indicates FNB Minnesota ranked 13th among 32 deposit taking institutions with a market share of 2.09 percent. The top competitors by market share include Wells Fargo Bank, Old National Bank, and U.S. Bank National Association with a combined market share of 48.71 percent.

The bank's primary lending focus in the Minneapolis MSA is business loans and home mortgage loans. Considering all loans originated and purchased in the Minneapolis MSA during the evaluation period, business loans represented 22.64 percent by number and 25.65 percent by dollar volume, and home mortgages represented 28.30 percent by number and 43.32 percent by dollar volume.

As a part of this review, examiners referenced recently completed community contacts to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the Minneapolis MSA. The contact works for a council that is focused on providing essential services and infrastructure including affordable housing. This contact indicated the need for affordable housing in the community. Another contact, who works for an economic development organization, highlighted the lack of affordable housing for first-time home buyers. The contact continued that there have been a few new constructions with more planned to attempt to meet the housing needs. The contact did not identify any unmet credit needs.

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

Assessment Area(s) – Minneapolis MSA						
						2023-2025
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	64	0.00	7.81	51.56	40.63	0.00
Population by Geography	286,524	0.00	7.21	51.63	41.15	0.00
Housing Units by Geography	103,751	0.00	7.90	53.80	38.30	0.00
Owner-Occupied Housing by Geography	81,911	0.00	5.85	51.36	42.79	0.00
Occupied Rental Units by Geography	17,153	0.00	18.75	61.73	19.52	0.00
Vacant Units by Geography	4,687	0.00	4.14	67.36	28.50	0.00
Businesses by Geography	9,388	0.00	7.16	51.30	41.54	0.00
Farms by Geography	635	0.00	4.88	67.56	27.56	0.00
Family Distribution by Income Level	74,314	15.09	15.79	23.65	45.48	0.00
Household Distribution by Income Level	99,064	16.52	14.52	19.23	49.73	0.00
Unemployment rate (%)	2.86	0.00	3.16	2.62	3.12	0.00
Households Below Poverty Level (%)	4.98	0.00	8.97	6.34	2.27	0.00
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)		$103,977			**Median Housing Value**	$319,200
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2025		$131,700			**Median Gross Rent**	$1,156
					Families Below Poverty Level	3.20
FFIEC File - 2020 Census FFIEC File - 2024 Census 2025 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0%						

<u>MN Non-MSA</u>

The MN Non-MSA included Sibley county. FNB Minnesota operated one full-service branch in the MN Non-MSA, located in Gaylord, MN. This branch accounted for 7.4 percent of the bank's deposit base as of June 30, 2025. The MN Non-MSA consisted of four CTs including three middle-income and one upper-income CTs.

Competition within the MN Non-MSA is moderate. The 2025 FDIC Market Share Report indicates FNB Minnesota ranked fifth among 10 deposit taking institutions with a market share of 6.65 percent. The top competitors by market share include ProGrowth Bank, Minnwest Bank, and Arlington State Bank with a combined market share of 60.97 percent.

The bank's primary lending focus in the MN Non-MSA is farm loans and home mortgage loans. Considering all loans originated and purchased in the MN Non-MSA during the evaluation period, farm loans represented 16.3 percent by number and 77.2 percent by dollar volume, and home mortgages represented 24.5 percent by number and 14.5 percent by dollar volume. For this evaluation, we only reviewed home mortgage loans as farm loans originated during the evaluation period were only to a total of nine borrowers, which does not provide for a meaningful analysis.

As a part of this review, examiners contacted a community contact to gain an understanding of the economic conditions, credit needs, and involvement of local financial institutions within the MN Non-MSA. The contact works for a community commission that supports community and economic development. The contact noted a lack of housing units available for people in the county to live close to where they work. The contact additionally commented on the need for infrastructure financing, funding for downtown revitalization efforts, farm loans, small business loans, and loans for first-time home buyers. Examiners additionally leveraged a second community contact that was recently completed to gain an understanding of the community. This contact works for an organization that advises the City Council regarding economic development, housing, and redevelopment matters. The contact reiterated the need for more housing in the community. The contact noted positive involvement from FNB Minnesota regarding projects and programs to support businesses as well as downpayment assistance for homebuyers.

The following table provides information on the MN Non-MSA demographic composition.

Assessment Area(s) – MN Non-MSA						
						2023-2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.00	0.00	75.00	25.00	0.00
Population by Geography	14,836	0.00	0.00	71.21	28.79	0.00
Housing Units by Geography	6,606	0.00	0.00	73.30	26.70	0.00
Owner-Occupied Housing by Geography	4,736	0.00	0.00	69.55	30.45	0.00
Occupied Rental Units by Geography	1,279	0.00	0.00	82.96	17.04	0.00
Vacant Units by Geography	591	0.00	0.00	82.40	17.60	0.00
Businesses by Geography	574	0.00	0.00	67.77	32.23	0.00
Farms by Geography	172	0.00	0.00	70.93	29.07	0.00
Family Distribution by Income Level	3,922	15.78	17.31	23.87	43.04	0.00
Household Distribution by Income Level	6,015	18.27	18.55	17.69	45.49	0.00
Unemployment rate (%)	2.91	0.00	0.00	3.15	2.33	0.00
Households Below Poverty Level (%)	8.10	0.00	0.00	9.25	5.06	0.00
Median Family Income (Non-MSAs - MN)		$74,710			Median Housing Value	$177,350
Median Family Income (Non-MSAs - MN) for 2025		$95,200			Median Gross Rent	$733
					Families Below Poverty Level	3.21
FFIEC File - 2020 Census FFIEC File - 2024 Census 2025 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0%						

Scope of Evaluation in Minnesota

The State of Minnesota rating is based entirely on the performance of the Mankato MSA, Minneapolis MSA, and the MN Non-MSA. The Mankato AA received the most weight due to the volume of branches, deposits, and loan originations within the state. The bank's activity in the Mankato MSA accounted for 58 percent of deposits, 50 percent of the branches, and 65 percent of the loans by number. The Minneapolis MSA received the second highest weighting with the bank's activity representing 35 percent of deposits, 25 percent of branches, and 24 percent of loans by number. The MN Non-MSA received the lowest weighting with activity representing seven percent of deposits, 25 percent of branches, and 11 percent of loans by number. All AAs received a full-scope review.

Loan product weighting was determined by volume and dollar value of originations and purchases. In the Mankato MSA, small loans to businesses received the most weight followed by home mortgage loans. In the Minneapolis MSA, home mortgage loans received the most weight followed by small loans to businesses. The MN-Non MSA included only home mortgages.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Minnesota is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

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

Mankato MSA

The geographic distribution of home mortgage loans in the Mankato MSA is excellent. The Mankato MSA contained no low-income CTs. Loans originated in moderate-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate lending percentage.

Minneapolis MSA

The geographic distribution of home mortgage loans in the Minneapolis MSA is reasonable. The Minneapolis MSA contained no low-income CTs. Loans originated in moderate-income CTs was near to both the percentage of owner-occupied housing units and the aggregate lending percentage.

MN Non-MSA

The geographic distribution of home mortgage loans is not meaningful because there were no low- or moderate-income (LMI) CTs in the AA during the evaluation period.

Small Loans to Businesses

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

Mankato MSA

The distribution of small loans to businesses in geographies of different income levels is reasonable. There were no low-income CTs within the Mankato MSA during the evaluation period. The percentage of small loans to businesses made in moderate-income geographies was well below both the percentage of small businesses in the AA and the aggregate lending percentage. Performance context was considered to support the reasonable geographic distribution performance conclusion. Based on 2024 American Community Survey (ACS) Census data, the middle-income CTs were more heavily populated than the moderate-income CTs, which supports a higher volume of lending to middle-income CTs. In addition, only four of the 23 CTs within the AA were moderate-income, which limited opportunities to lend in these areas. The bank operated one branch in an adjacent CT to the moderate-income CTs; however, significant competition in the Mankato moderate-income CTs limited the bank's ability to generate loans in those CTs.

Minneapolis MSA

The distribution of small loans to businesses in geographies of different income levels is poor. The Minneapolis MSA contained no low-income CTs. The bank originated zero loans within a moderate-income CT. Performance context was considered to support the geographic distribution performance conclusion. Only 672 of the 9,388 businesses in the AA were located in the five moderate-income CTs, making it challenging for the bank to lend in these CTs. Within Scott County there are four moderate-income CTs with the closest FNB Minnesota branch being 20 miles away. Competition was moderate with four competitor banks located in the moderate-income CTs as well as seven banks in adjacent CTs, which limits opportunities to lend in these areas. Within Le Suer County there was one moderate-income CT with the closest FNB Minnesota branch located 12 miles away. Competition in the CT was moderate with three other bank branches located there.

Lending Gap Analysis

Maps and lending activity were reviewed for the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified in the state of Minnesota.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Mankato MSA

The borrower distribution of home mortgage loans to LMI borrowers is reasonable. The percentage of loans to low-income borrowers was well below the percentage of families in the AA and near the aggregate lending percentage. The percentage of loans to moderate-income borrowers was well below both the percentage of families in the AA and the aggregate lending percentage. Due to higher cost of housing in the AA, the bank's lending was limited. Based on Federal Financial Institution Examination Council (FFIEC) census data, the median housing value in 2025 was $186,700 and low-income families made less than $4,362.50 monthly.. Using a maximum monthly principal and interest payment, a monthly mortgage payment for low-income borrowers would be $1,119.36, which is 25.7 of their monthly income. Additionally, strong competition in the bank's AA hindered the bank's ability to meet the aggregate comparators.

Minneapolis MSA

The borrower distribution of home mortgage loans to LMI borrowers is excellent. The percentage of loans to low-income borrowers was lower than the percentage of families in the AA but significantly exceeded the aggregate lending percentage. The percentage of loans originated to moderate-income borrowers significantly exceeded the percentage of families in the AA and was near to the aggregate lending percentage.

MN Non-MSA

The borrower distribution of home mortgage loans to LMI borrowers is excellent. The percentage of loans to low-income borrowers was well below the percent of families in the AA and somewhat lower than the aggregate lending percentage. The percentage of loans to moderate-income borrowers significantly exceeded both the percentage of families in the AA and the aggregate lending percentage.

Small Loans to Businesses

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

Mankato MSA

The distribution of loans to small businesses is excellent. The percentage of loans to small businesses was somewhat lower than the percentage of small businesses in the AA but significantly exceeded the aggregate lending percentage.

Minneapolis MSA

The distribution of small loans to businesses is excellent. The percentage of loans to small businesses was somewhat lower than the percentage of small businesses in the AA but significantly exceeded the aggregate lending percentage.

Responses to Complaints

During the evaluation period, there were no complaints related to FNB Minnesota's CRA performance in meeting the credit needs of its AAs.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the State of Minnesota is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits adequate responsiveness to community development needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

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

Table 3: Community Development Loans				
	Total			
Assessment Area	**#**	**% of Total #**	**$(000's)**	**% of Total $**
Mankato MSA	3	50.0	2,862	55.7
Minneapolis MSA	1	16.67	1,000	19.5
MN Non-MSA	1	16.67	315	6.1
Broader Statewide or Regional Area	1	16.67	960	18.7
Total	**6**	**100.0**	**5,137**	**100.0**

Mankato MSA

FNB Minnesota made three CD loans totaling $2.9 million, which represented 11.86 percent of allocated capital. Allocated capital is the percentage of deposits in the AA multiplied by the bank's tier one capital as of December 31, 2025. The CD loans supported community services.

The following are examples of CD loans the bank originated in the Mankato MSA:

- Two loans totaling $1.8 million to multi-family apartment buildings that primarily house LMI individuals. One loan was to construct a new multi-family housing development where a portion of the units were restricted to residence whose income is below 50 percent of the area median income. The other loan supported a multi-family housing complex where the rents were affordable to LMI households.
- One loan for one million to support community services within a LMI senior housing complex. Loan proceeds contributed to elder abuse education and prevention for both residence and support staff.

Minneapolis MSA

FNB Minnesota made one loan totaling $1.0 million, which represented 6.91 percent of allocated capital. The loan supported community services within an LMI senior housing complex. Loan proceeds contributed to elder abuse education and prevention for both residents and support staff.

MN Non-MSA

FNB Minnesota made one loan totaling $315 thousand, which represented 10.16 percent of allocated capital. The loan supported multi-family affordable housing, a subsidized housing complex where the rental units are affordable to LMI households.

State of Minnesota

The bank made one CD loan totaling $960 thousand in the broader statewide and regional area whose purpose, mandate, or function included serving the bank's AA. The loan supported the creation of new affordable housing units in an LMI census tract outside the bank's AA in the state of Minnesota. The new housing units attracted additional residents to an LMI area and contributed to neighborhood revitalization and stabilization.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Mankato AA	0	0	11	44.0	11	44.0	65	2.3	0	0
Minneapolis AA	0	0	5	20.0	5	20.0	2,490	86.8	0	0
MN Non-MSA AA	0	0	8	32.0	8	32.0	3	0.1	0	0
Broader Statewide or Regional Area	0	0	1	4.0	1	4.0	310	10.8	0	0
Total	**0**	**0**	**25**	**100.0**	**25**	**100.0**	**2,868**	**100.0**	**0**	**0**

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

Mankato MSA

Qualified investments amounted to $65 thousand and represented 0.27 percent of allocated capital. Qualified investments were comprised entirely of donations. FNB Minnesota made contributions to community services for LMI individuals.

The following are examples of qualified investments in the AA:

- A $20 thousand donation to a nonprofit organization that provides food aid, clothing, shelter, and other community services to LMI households**.**
- A $10 thousand donation to a nonprofit organization that provides food, health services, and academic support for LMI youth.
- A $10 thousand donation to a nonprofit organization providing emergency food assistance for LMI families.

Minneapolis MSA

Qualified investments amounted to $2.5 million and represented 17.21 percent of allocated capital. Qualified investments were comprised of two investments and three donations. FNB Minnesota made contributions to community services for LMI individuals.

The following are examples of qualified investments in the AA:

- Two investments totaling $2.5 million, which contributed to supporting affordable housing in the AA through purchases of LMI mortgage-backed securities.
- Three donations totaling $1 thousand to a food shelf supporting LMI individuals.

MN Non-MSA

Qualified investments amounted to $2.6 thousand and represented 0.09 percent of allocated capital. Qualified investments were comprised entirely of donations. FNB Minnesota made contributions to community services for LMI individuals and to support affordable housing.

The following are examples of qualified investments in the AA:

- A $395 donation to provide weekend food backpacks to LMI youth and families.
- A $390 donation to a nonprofit organization that provides affordable homeownership opportunities for LMI families.

State of Minnesota

The bank made one investment totaling $310 thousand in the broader statewide and regional area whose purpose, mandate, or function included serving the bank's AA. The investment supported affordable housing in the AA through purchases of LMI mortgage-backed securities.

Extent to Which the Bank Provides Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, 18 employees provided their expertise to 14 organizations for a total of 719 hours. These CD services were on behalf of organizations focused on community services targeted to LMI and economic development initiatives.

Mankato MSA

A total of 11 employees provided 470 hours to 10 qualified CD organizations benefiting the AA. CD services supported economic development and community service to LMI individuals.

The following are examples of community development services in the AA:

- One employee provided 260 hours of service to an organization promoting economic development in the AA by supporting technical assistance for small businesses.
- Two employees provided 38 hours of service to a nonprofit organization providing an array of food and basic needs for LMI households.
- Two employees provided 23 hours of service to an organization providing workforce development initiatives to small farms.

Minneapolis MSA

Five employees provided a total of 83 hours to three qualified CD organizations benefiting the AA. CD services supported economic development and community services for LMI individuals. Three employees provided 67 hours of service to an organization focused on providing technical assistance to small businesses.

MN Non MSA

Two employees provided a total of 166 hours to one qualified CD organization benefiting the AA. CD services supported economic development. The two employees provided service to an organization focused on providing technical assistance to small businesses. One employee served on the Board of Directors and the other employee served on a committee.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2023 to 12/31/2025	
Bank Products Reviewed:	Home mortgage and small business	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Minnesota		
Mankato MSA	Full-scope	Blue Earth and Nicollet Counties
Minneapolis MSA	Full-scope	Carver, Le Sueur, and Scott Counties
MN Non-MSA	Full-scope	Sibley County

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	**Lending Test Rating***	**CD Test Rating***	**Overall Bank/State/ Multistate Rating**
First National Bank Minnesota	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Minnesota	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023-2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Mankato AA	79	15,481	57.66	3,403	--	--	--	16.23	25.32	19.31	68.82	62.03	67.03	14.96	12.66	13.64	--	--	--
Minneapolis AA	36	9,159	26.28	15,523	--	--	--	5.85	5.56	5.91	51.36	83.33	50.86	42.79	11.11	43.23	--	--	--
MN Non-MSA	22	3,145	16.06	660	--	--	--	--	--	--	69.55	81.82	64.85	30.45	18.18	35.15	--	--	--
Total	**137**	**27,786**	**100.00**	**19,586**	**--**	**--**	**--**	**7.97**	**16.06**	**8.04**	**56.11**	**70.80**	**54.14**	**35.92**	**13.14**	**37.82**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023-2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Mankato AA	79	15,481	57.66	3,403	20.51	7.59	9.23	17.51	7.59	26.12	24.35	16.46	23.60	37.62	22.78	27.33	--	45.57	13.72
Minneapolis AA	36	9,159	26.28	15,523	15.09	8.33	6.86	15.79	19.44	21.56	23.65	19.44	23.62	45.48	36.11	35.21	--	16.67	12.76
MN Non-MSA	22	3,145	16.06	660	15.78	4.55	8.03	17.31	45.45	28.94	23.87	18.18	24.85	43.04	27.27	26.36	--	4.55	11.82
Total	**137**	**27,786**	**100.00**	**19,586**	**16.38**	**7.30**	**7.31**	**16.25**	**16.79**	**22.60**	**23.82**	**17.52**	**23.65**	**43.55**	**27.01**	**33.54**	**--**	**31.39**	**12.89**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2023-2025
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Mankato AA	20	5,991	30.77	2,771	--	--	--	24.80	15.00	24.11	63.39	70.00	63.98	11.81	15.00	11.91	--	--	--
Minneapolis AA	45	4,901	69.23	11,729	--	--	--	7.16	--	5.72	51.30	73.33	47.46	41.54	26.67	46.82	--	--	--
Total	**65**	**10,892**	**100.00**	**14,500**	**--**	**--**	**--**	**11.62**	**4.62**	**9.04**	**55.26**	**72.31**	**50.92**	**33.13**	**23.08**	**40.04**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023-2025
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mankato AA	20	5,991	30.77	2,771	81.12	65.00	47.42	4.75	35.00	14.12	--
Minneapolis AA	45	4,901	69.23	11,729	87.84	64.44	52.53	3.69	35.56	8.48	--
Total	**65**	**10,892**	**100.00**	**14,500**	**85.79**	**64.62**	**51.64**	**3.95**	**35.38**	**10.26**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%