

CRA Public File

KEEN BANK, N.A.
2023

April 1, 2023

No comments have been received from the public in 2021, 2022, or 2023 that relate to the Bank's performance in helping meet the community credit needs.



PUBLIC DISCLOSURE

October 24, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Keen Bank, National Association
Charter Number 6544

101 S State St,
Waseca, MN 56093

Office of the Comptroller of the Currency

222 South Ninth Street
Suite 800
Minneapolis, Minnesota 55402-3393

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.

Table of Contents

Overall CRA Rating.....	Error! Bookmark not defined.
Description of Institution	Error! Bookmark not defined.
Scope of the Evaluation	2
Discriminatory or Other Illegal Credit Practices Review	3
State Rating.....	5
State of Minnesota	5
Appendix A: Scope of Examination	A-Error! Bookmark not defined.
Appendix B: Summary of MMSA and State Ratings.....	B-Error! Bookmark not defined.
Appendix C: Definitions and Common Abbreviations.....	C-Error! Bookmark not defined.
Appendix D: Tables of Performance Data.....	D-ERROR! BOOKMARK NOT DEFINED.

Overall CRA Rating

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

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.
- A majority of loans are originated or purchased inside the assessment area (AA).
- The loan-to-deposit (LTD) ratio is reasonable.
- The bank did not receive any CRA related complaints during the evaluation period.

Loan-to-Deposit Ratio

Keen Bank's LTD ratio is reasonable considering the bank's size, financial condition, and credit needs of the AA.

The bank's average quarterly LTD was 82.3 percent over the 14 quarters between September 30, 2018, and December 31, 2021. The LTD ratio ranged from 64.0 percent to 94.1 percent during that time. Keen Bank is ranked second out of four similarly situated institutions. Similarly situated institutions shared at least one assessment area and had a similar asset-size, ranging from \$121.5 million to \$181.4 million as of December 31, 2021.

Loan-to-Deposit Ratio		
Institution	Total Assets \$(000s)	Average LTD Ratio (%)
Security Bank Minnesota	149,442	90.5
Keen Bank, National Association	172,056	82.3
Arcadian Bank	181,439	81.6
Produce State Bank	121,534	60.4

Source: Call Report Data from September 30, 2018 to December 31, 2021.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 55 percent by number and 51.7 percent by dollar of its loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level, by selecting a sample of 20 home mortgage and 20 small business loans originated or purchased during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	10	50.0	10	50.0	20	1,139	29.6	2,698	70.3	3,837
Small Business	12	60.0	8	40.0	20	4,496	63.6	2,573	36.4	7,069
Total	22	55.0	18	45.0	40	5,635	51.7	5,271	48.3	10,906

Description of Institution

Keen Bank is a \$172 million, single state community bank with three branch locations. The bank is 100 percent owned by Frankson Investment Corporation, a single bank holding company located in Waseca, MN. Keen Bank does not have any subsidiaries or affiliates, aside from the holding company. Holding company assets total \$13.6MM as of 12/31/21. No merger or acquisition activities affected the bank during the evaluation period. The bank recently changed its name to Keen Bank, from First National Bank of Waseca, in April 2022.

The bank is headquartered in Waseca, MN, 70 miles south of Minneapolis, MN in Waseca County. The other two branches are located in Hope, MN and Ellendale, MN, in Steele County and Freeborn County, respectively. The Waseca branch has an onsite ATM and night drop that are available to customers 24 hours a day, seven days a week. There is also a second ATM located inside the Waseca High School. The bank does not operate any deposit-taking ATMs. The bank has one AA, referred to as the Waseca AA, including Waseca County, the northern portion of Freeborn County, and the southern portion of Steele County.

Keen Bank offers traditional banking products and services. Home mortgage and business loans are the banks primary products. As of December 31, 2021, the bank's outstanding loan portfolio totaled \$111.6 million. The loan portfolio by dollar volume is comprised of 50.0 percent home loans, 44.5 percent business loans, 3.0 percent consumer loans, and 2.6 percent farm loans. Net loans and leases represented 61.91 percent of average assets, and Tier 1 capital is \$13.8 million.

The most recent CRA Performance Evaluation, dated August 13, 2018, resulted in a Satisfactory overall rating. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Keen Bank was evaluated under CRA small bank procedures, which consists of the Lending Test. The evaluation period for the LTD analysis covered the quarters ending September 30, 2018, to December 31, 2021. The complaints analysis period covered August 14, 2018, to October 24, 2022. The evaluation period for the remaining portions of the Lending Test covered January 1, 2019, through December 31, 2021.

We determined Keen Bank's primary loan products for the AA by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. Home and business loans were Keen Bank's primary loan products in the AA as they represented the largest volume by dollar. We reviewed samples of 20 home and 20 business loans originated or purchased during the evaluation period to complete the Lending Test analysis.

The table below to reflects total loan purchases and originations by dollar and number during the evaluation period.

Loan Originations and Purchases 2019-2021				
Loan Type	Number of Loans		Dollar of Loans	
	#	%	\$ (000s)	%
Farm	27	2	1,808	2
Business	247	22	37,477	40
Consumer	524	47	5,962	6
Home	323	29	48,983	52
Total	1,121	100	94,230	100
<i>Source: Bank data. Due to rounding, totals may not equal 100.0</i>				

We reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted a community member with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AA.

Selection of Areas for Full-Scope Review

The Waseca AA was selected for a full-scope review as it is the bank's only AA. Refer to Appendix A: Scope of Examination for an outline of the examination scope.

Ratings

The bank's overall rating is based on the state of Minnesota, as the bank only has branches in Minnesota. The state rating is based on performance in the bank's single AA, the Waseca AA. The bank's lending performance was evaluated on four performance criteria: the loan-to-deposit ratio, lending in the AA, lending to borrowers of different incomes, and responses to CRA related complaints. We did not assess the distribution of loans to geographies of different income levels. The AA is comprised entirely of middle- and upper-income geographies, as a result, the geographical distribution would not provide a meaningful analysis.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) in determining a national bank's 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: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans to businesses of different sizes and borrowers of different income levels is excellent.
- Keen Bank did not receive any CRA related complaints during the review period.
- Geographic distribution is not meaningful since the bank's AA does not include any low- or moderate-income (LMI) CTs.

Description of Institution's Operations in Minnesota

Keen Bank has three branches, entirely located in the state of Minnesota. Locations include Waseca, Hope, and Ellendale, MN.

The bank has one AA, which includes the five CTs in Waseca County, two CTs in northern Freeborn County, and two CTs in southern Steele County. Eight of the CTs in the AA are middle-income and one CT is upper-income. There are no low- or moderate-income CTs in the AA. The bank's AA reasonably excludes several census tracts in Steele and Freeborn counties where the bank does not have a presence.

Competition within the AA is strong. According to the FDIC Deposit Market Share Report as of June 30, 2022, twenty-two financial institutions operate within the AA. Keen Bank ranks fifth in deposit market share with \$160 million in deposits, representing 6.9 percent of the deposit market share. Wells Fargo holds the largest share of deposits within the AA, with \$420 million representing 18.0 percent of the deposit market share. US Bank holds the next largest share in the AA with \$264 million representing 11.4 percent of the deposit market share.

The AA's unemployment rate tends to follow Minnesota's trend overall. The AA's economy was moderately impacted by the Covid-19 pandemic but is recovering quickly. According to the Bureau of Labor Statistics (BLS), the Waseca County unemployment rate reached a high of 9.7 percent in 2020, while Minnesota's high was 10.9 percent. This is an increase from the Waseca County annual average in 2019, pre-pandemic, of 4.1 percent. The average unemployment rate in Waseca county fell back to an average of 3.9 percent in 2021.

We contacted one community member with a local organization located in Waseca. The community contact stated there are multiple opportunities available for local financial institutions in the Waseca area to be involved with and invest in the community, despite tighter household disposable income and decreased housing availability. They also noted banks in the Waseca area are highly involved, providing financial support to local organizations in numerous ways including schools within the community.

The following tables provide demographic information on the Waseca AA during the evaluation period. We analyzed and incorporated relevant demographic information from the AA in the Lending Test to evaluate the bank's home mortgage and business lending performance.

Waseca AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB Waseca - Waseca AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	30,878	0.0	0.0	90.6	9.4	0.0
Housing Units by Geography	12,945	0.0	0.0	90.2	9.8	0.0
Owner-Occupied Units by Geography	9,616	0.0	0.0	89.2	10.8	0.0
Occupied Rental Units by Geography	2,236	0.0	0.0	94.6	5.4	0.0
Vacant Units by Geography	1,093	0.0	0.0	90.2	9.8	0.0
Businesses by Geography	2,303	0.0	0.0	88.5	11.5	0.0
Farms by Geography	472	0.0	0.0	78.8	21.2	0.0
Family Distribution by Income Level	8,323	15.3	16.8	23.8	44.1	0.0
Household Distribution by Income Level	11,852	18.8	14.6	19.4	47.1	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$140,363
			Median Gross Rent			\$583
			Families Below Poverty Level			5.7%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Minnesota

The rating for the state of Minnesota is based fully on the performance in the Waseca AA as it is the bank's only AA. We completed a full-scope review of the Waseca AA.. Refer to Appendix A, Scope of Examination, for more information.

LENDING TEST

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

The bank's lending activity reflects outstanding responsiveness to AA credit needs for home mortgage and small business loans.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank's performance in the Waseca AA is excellent.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes when compared to aggregate lending data and AA demographics.

Home Mortgage Loans

Refer to Table P 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.

The borrower distribution of home mortgage loans to individuals of income levels is excellent. The bank originated 35 percent of its home loans to low-income borrowers, significantly exceeding demographic and aggregate lending comparators. The bank's lending to moderate-income borrowers represented 20 percent of home mortgage loans in our sample, exceeding the demographic comparator and near to the aggregate lending comparator. Demographic lending performance is considered a better comparator as it reflects the credit needs of the community. Strong competition hindered the bank from exceeding the aggregate comparator for moderate-income borrowers.

Small Loans to Businesses

Refer to Table R 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.

The borrower distribution of loans to businesses of different sizes is excellent. The bank's lending to small businesses significantly exceeds the aggregate lending to small businesses comparator and is near to the demographic comparator.

Distribution of Loans by Income Level of the Geography

Refer to Tables O and Q 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 home mortgage and small business loans.

Geographic distribution is not meaningful because there are no LMI CTs in the bank's AA.

Responses to Complaints

There were no consumer complaints pertaining to Keen Bank's CRA performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	(Home mortgage, small business)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Frankson Investment Corporation.	Holding Company	None
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota		
Waseca AA	Full Scope	Waseca County (full) Freeborn County (partial), including CTs: 1801, 1802 Steele County (partial), including CTs: 9605, 9608

Appendix B: Summary of MMSA and State Ratings

RATINGS – Keen Bank	
Overall Bank:	Lending Test Rating
Keen Bank	Outstanding
State:	
Minnesota	Outstanding

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 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 LMI 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): 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, 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 investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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 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 multi-state 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state 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.

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/assessment area. 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 O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - 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 compared 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 assessment area.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Waseca AA	20	\$1,918	100	1,133	0.0	0.0	0.0	0.0	0.0	0.0	89.2	90.0	90.1	10.8	10.0	9.9	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% Of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Waseca AA	20	\$1,918	100.0	1,133	15.3	35.0	8.3	16.8	20.0	22.5	23.8	20.0	23.2	44.1	25.0	28.3	0.0	0.0	17.7

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Waseca AA	20	6,371	100.0	369	0.0	0.0	0.0	0.0	0.0	0.0	88.6	83.3	86.2	11.4	16.7	13.8	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Waseca AA	20	6,371	100.0	297	84.8	75.0	44.1	4.7	25.0	10.6	0.0

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Offices and Branches

Keen Bank, N.A.

Waseca Locations:

(Assessment Areas 7901, 7902, 7903, 7904, 7905, Waseca County)

Main Bank, Downtown Waseca
101 North State Street
Waseca, MN 56093

ATM- On-Site/Drive-Thru
ATM- Waseca High-School, 1717 2nd St NW, Waseca, MN

Ellendale Location:

(Assessment Areas 1801, 1802, 9608, Freeborn County, Steele County)

119 5th Avenue
Ellendale, MN 56062

Hope Location:

(Assessment Areas 9605, 9608, Steele County)

9087 SW 37th Ave
Main Street
Hope, MN 56046

**** ATM's Do Not Accept Deposits at any locations**

Branches Opened/Closed

2021	-	None
2022	-	None
2023	-	None

Office Hours

4/2023

Main Office

Lobby Monday through Friday 8:30am to 4:30pm

Drive-Up Monday through Friday 7:30am to 5:30pm
Saturday from 9:00am to Noon

Ellendale Office

Lobby Monday through Friday, 8:30am to 4:30pm
Saturday from 9:00am to Noon

Hope Office

Lobby Monday through Friday, 8:30am to 4:30pm
Saturday Closed

Deposit Products

Checking Accounts

- LifeSimple Checking
- LifePerks Checking
- Small Business Checking
- Business Checking
- LifePlatinum Checking
- Health Checking

Savings Accounts

- LifeEquity Savings
- Holiday Club Savings
- Business Savings

Certificates of Deposit – Terms Available:

- 1 year or 18 months
- 2 year or 30 months
- 3, 4, or 5 year

Individual Retirement Accounts (IRA's)

- Traditional/SEP
- Roth

Miscellaneous Products and Services

- ATM machine
- Fax Machine
- Coin Counting
- Photocopies
- Safe Deposit Box
- Remote Deposit Capture
- Credit Card through Elan Services
- Notary
- Internet Banking
- Cash Management
- Bill Pay
- Merchant Capture
- Mobile Remote Deposit
- Debit Card
- Instant Issue Debit Card and PIN reset
- In-house check printing

Loan Products

Commercial Loan Products

- Real Estate
- Operating
- Equipment
- SBA

Agricultural Loan Products

- Real Estate
- Operating
- Equipment
- SBA

Installment & Consumer

- Personal
- Automobile
- Recreational Vehicles
- Overdraft Protection Lines of Credit

Real Estate Loan Programs

- Conventional/Adjustable-Rate Programs
- Mortgage Partnership Finance (MPF), through the Federal Home Loan Bank of Des Moines
- Home Mortgage
- Home Equity
- Home Equity Lines of Credit

Each Office is also able to make referrals to:

- Federal Housing Authority (FHA)
- Veterans Association (VA)
- Rural Development Authority (RDA)

These products and services are offered at all Keen Bank, N.A. locations.

IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS

from

Keen Bank, N.A.
101 State Street N
Waseca, MN 56093
(507)835-2740

COMMON FEATURES

Limits and fees - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Abandoned Account Fee	\$25.00
Account Activity Printout	\$5.00
Account Charge Off Fee	\$150.00
Account Closing	\$25.00
Within 3 months	
Account Research & Balancing	\$35.00 per hour
\$35 minimum	
ATM or Debit Card Replacement Fee	\$10.00
ATM or Debit Card Replacement Fee - Express Order	\$65.00
ATM Withdrawal Limit Per Day	\$500.00
You may request a different daily dollar limit	
Cashier's Check	\$6.00
Check Images Fee - Monthly	\$3.00
Check Orders	Varies by Style
Foreign Collection Fee	\$15.00
Inactivity Fee	\$5.00 per month under \$1,000.00
Checking account inactive after 12 months of no activity	
Savings account inactive after 18 months of no activity	
IRA Transfer / Rollover Fee	\$30.00
Nonsufficient Funds (NSF) Fee	\$5.00 per item
An item or payment may be presented multiple times and that we do not monitor or control the number of times a transaction is presented for payment.	
Overdraft Fee	\$30.00 per item
Max \$90/day	
Point-Of-Sale (POS) - Debit Card Limit Per Day	\$2,000.00
You may request a different daily dollar limit	
Stop Payment	\$30.00
Wire - Incoming Domestic or Foreign	\$10.00
Wire - Outgoing Domestic	\$25.00
Wire - Outgoing Foreign	\$50.00

LIMITS AND FEES DISCLOSURE

XX/1 21.021.05230

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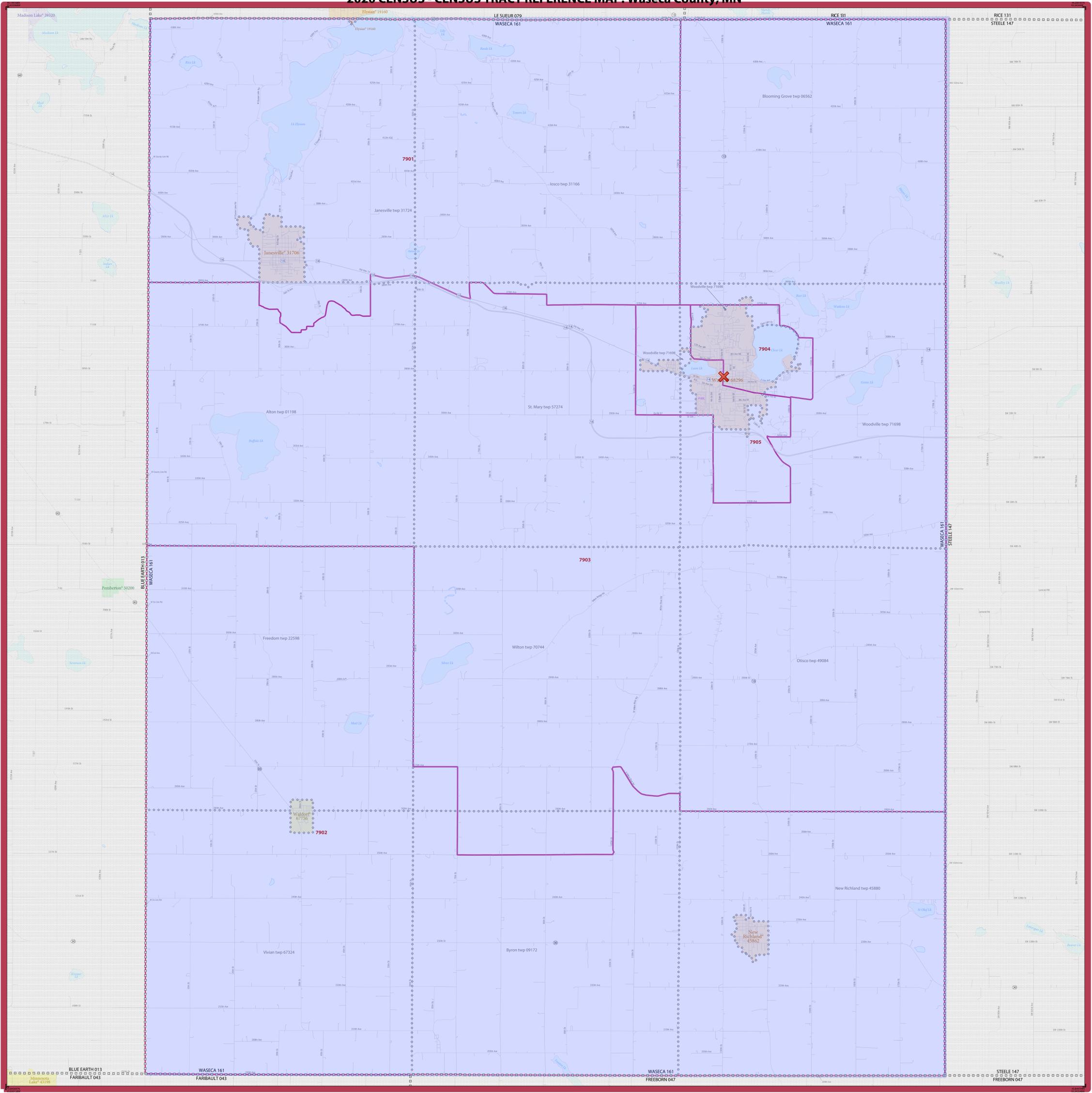
Page 1

**Assessment Area of Keen Bank, N.A.
Waseca, Ellendale, and Hope Offices**

The assessment area for the Keen Bank, N.A. includes the following block numbered areas:

Block Number	City	Village	Township	County
7901	Janesville	N/A	Iosco, Janesville	Waseca
7902	New Richland, Waldorf	N/A	Freedom, Vivian, Byron, New Richland	Waseca
7903	N/A	N/A	Alton, St Mary, Wilton, Otisco, Woodville, Blooming Grove, Byron, St. Mary	Waseca
7904	Waseca	N/A	Woodville	Waseca
7905	Waseca	N/A	Woodville	Waseca
9605	N/A	Hope, Meriden	Meriden, Lemond, Berlin, Somerset, Aurora, Deerfield, Owatonna	Steele
9608	Ellendale, Blooming Prairie	N/A	Summit, Blooming Prairie, Berlin, Aurora	Steele
1801	Geneva	Hollandale	Geneva, Newry, Riceland, Moscow, Bath, Hayward, Oakland	Freeborn
1802	Hartland, Manchester, Freeborn, Clarks Grove	N/A	Freeborn, Hartland, Bath, Carlston, Manchester, Bancroft, Geneva	Freeborn

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Waseca County, MN



Waseca Branch

Blue shaded area is the bank's assessment area.

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International	☆☆☆☆	CANADA	Incorporated Place 1,2	Yellow/Green	Davis 18100
Federal American Indian Reservation	■■■■■■■■■■	L'ANSE RESVN 1880	Census Designated Place (CDP) ³	Yellow/Red	Incline Village 35100
OEI Reservation Trust Land	■■■■■■■■■■	T1880	Census Tract ³	Red	33.07
State American Indian Reservation	■■■■■■■■■■	Tama Resvn 9400			
Alaska Native Regional Corporation	▼▼▼▼▼▼	NANA ANRC 52120	DESCRIPTION	SYMBOL	DESCRIPTION
State (or statistically equivalent entity)		NEW YORK 36	Water Body	Blue	Interstate or U.S. Highway
County (or statistically equivalent entity)	□□□□□	ERIE 029	College or University	Green	State Highway or State Road
Minor Civil Division (MCD) ³	○○○○○	Bristol town 07485	Military	Red	Other Road
Census County Division (CCD), Census Subarea (CSA) or Unincorporated Territory (UT)	○○○○○	Hanna CCD 91650	Prison or Juvenile Detention Center	Red	4WD Trail, Stairway, Also, Walkway or Ferry
Consolidated City	○○○○○	MILLFORD 47500	Notable Boundary or Feature Not Elsewhere Classified	Red	Nonvisible Boundary or Feature Not Elsewhere Classified
			Inset Area	Blue	Inset Area

Where international, state, county, and/or MCD/CCD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.
 Geographic area names are followed by other their FIPS or census code.
 1. A "*" following an MCD name denotes a false MCD. A "*" following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.
 2. Place label color corresponds to the place fill color.
 3. Census tracts are identified by an up to four-digit integer number and may have an optional two-digit suffix; for example 23 or 1457.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 145702, respectively.
 Due to space limitations, some road names, along with other feature and geography names on the map, may not be shown.



All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.
 Geographic Vintage: 2020 Census (reference date: January 1, 2020)
 Data Source: U.S. Census Bureau's MAJ/TIGER database (TAR20)
 Map Created by Geography Division, January 06, 2021
 U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau



Sheet 1 of 1 PARENT sheets
 Total Sheets: 1 (Index 0; Parent 1; Inset 0)
 NAME: Waseca County (161)
 ENTITY TYPE: County or statistically equivalent entity
 ST: Minnesota (27)

2020 CENSUS TRACT REF MAP (PARENT)
 Sheet ID: 2495271001



2022 FFIEC Census Report - Summary Census Demographic Information

State: 27 - MINNESOTA (MN)

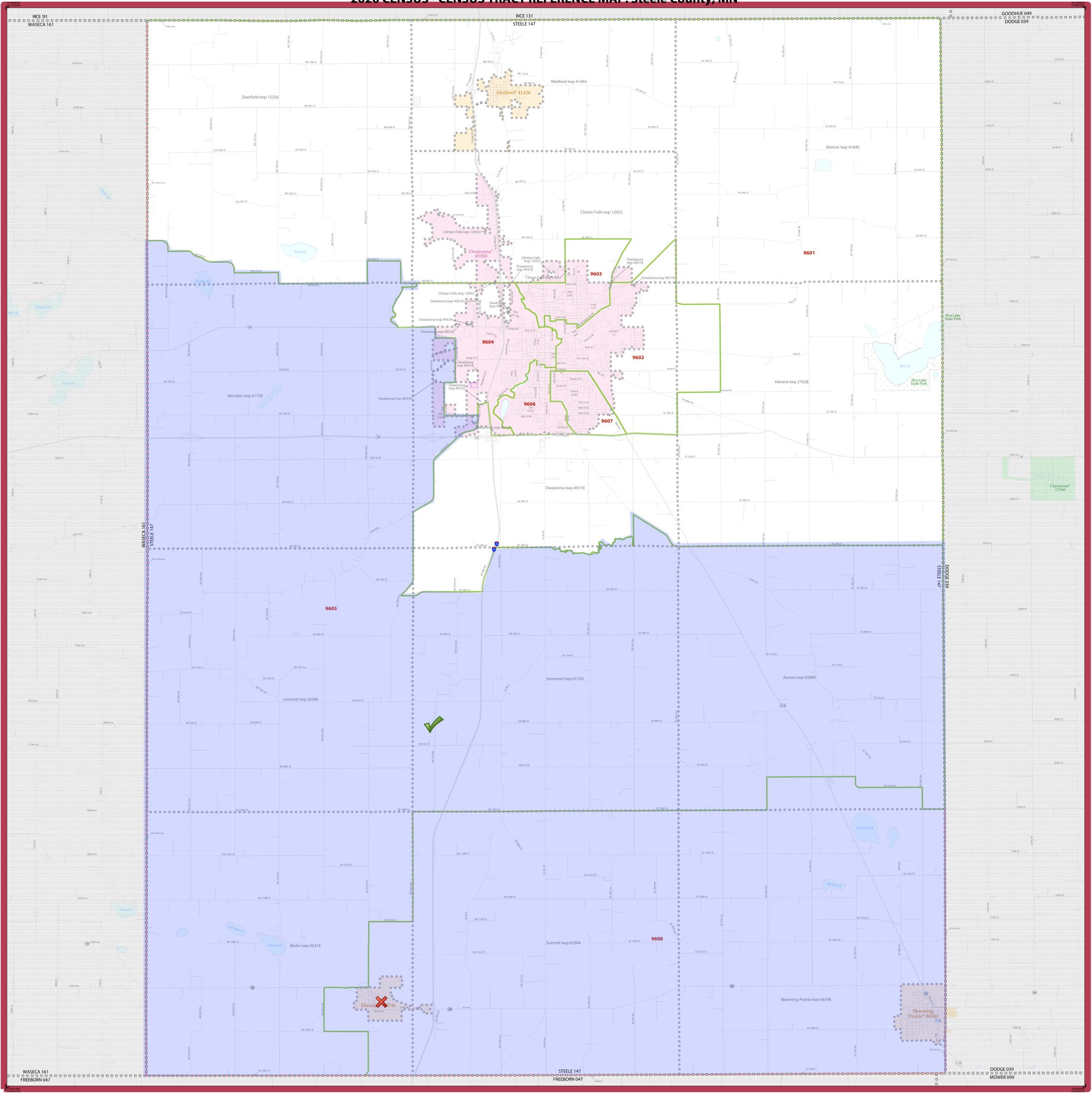
County: 161 - WASECA COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2022 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
27	161	7901.00	Middle	No	107.59	\$83,600	\$89,945	\$80,417	3541	6.35	225	1268	1499
27	161	7902.00	Middle	No	99.79	\$83,600	\$83,424	\$74,583	2617	6.19	162	871	1121
27	161	7903.00	Upper	No	121.85	\$83,600	\$101,867	\$91,071	3065	5.81	178	1213	1378
27	161	7904.00	Middle	No	99.80	\$83,600	\$83,433	\$74,592	5550	14.05	780	1721	1991
27	161	7905.00	Moderate	No	67.76	\$83,600	\$56,647	\$50,645	4195	25.86	1085	909	1284
27	161	9999.99	Middle	No	99.68	\$83,600	\$83,332	\$74,505	18968	12.81	2430	5982	7273

* Will automatically be included in the 2023 Distressed or Underserved Tract List

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Steele County, MN



SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International	☆☆☆☆	CANADA	Incorporated Place 1,2	Yellow/Green	Davis 18100
Federal American Indian Reservation	L'ANSE RESVN 1880	Census Designated Place (CDP) 3	Orange	Incline Village 35100
Oil Reservation Trust Land	T1880	Census Tract 3	Red	33.07
State American Indian Reservation	Tama Resvn 9400	DESCRIPTION	SYMBOL	DESCRIPTION
Alaska Native Regional Corporation	NANA ANRC 52120	Water Body	Blue	Planned Lake
State (or statistically equivalent entity)		NEW YORK 36	College or University	Blue	Canal
County (or statistically equivalent entity)		ERIE 029	Minor Civil Division (MCD) 3	Blue	4WD Trail, Stairway, Also, Walkway or Ferry
Minor Civil Division (MCD) 3	Bristol town 07485	Prison or Juvenile Detention Center	Blue	NYDK
Census County Division (CCD), Census Subarea (CSA), or Unincorporated Territory (UT)	Hanna CCD 91650	Navigable Boundary or Feature Not Elsewhere Classified	Blue	Yosemite NP
Consolidated City	MILLFORD 47500	Inset Area	Blue	A1

X Ellendale Branch ✓ Hope Branch
 Blue shaded area is the bank's assessment area.

1. A ** following an MCD name denotes a false MCD. A * following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.
 2. Place label color corresponds to the place fill color.
 3. Census tracts are identified by an up to four-digit integer number and may have an optional two-digit suffix for example 23 or 1457.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 145702, respectively.
 Due to space limitations, some road names, along with other feature and geography names on the map, may not be shown.

All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.
 Geographic Vintage: 2020 Census (reference date: January 1, 2020)
 Data Source: U.S. Census Bureau's MAJ/TIGER database (TAB20)
 Map Created by: Geography Division, January 06, 2021
 U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau

Projection: Albers Equal Area Conic
 Datum: NAD 83
 Spheroid: GRS 80
 1st Standard Parallel: 44.2852
 2nd Standard Parallel: 48.2413
 Central Meridian: -93.2139
 Latitude of Projection Origin: 43.3801
 False Easting: 0
 False Northing: 0

Sheet 1 of 1 PARENT sheets
 Total Sheets: 1 (Index 0; Parent 1; Inset 0)
 NAME: Steele County (147)
 ENTITY TYPE: County or statistically equivalent entity
 ST: Minnesota (27)

2020 CENSUS TRACT REF MAP (PARENT)
 Sheet ID: 24952747001

2022 FFIEC Census Report - Summary Census Demographic Information

State: 27 - MINNESOTA (MN)

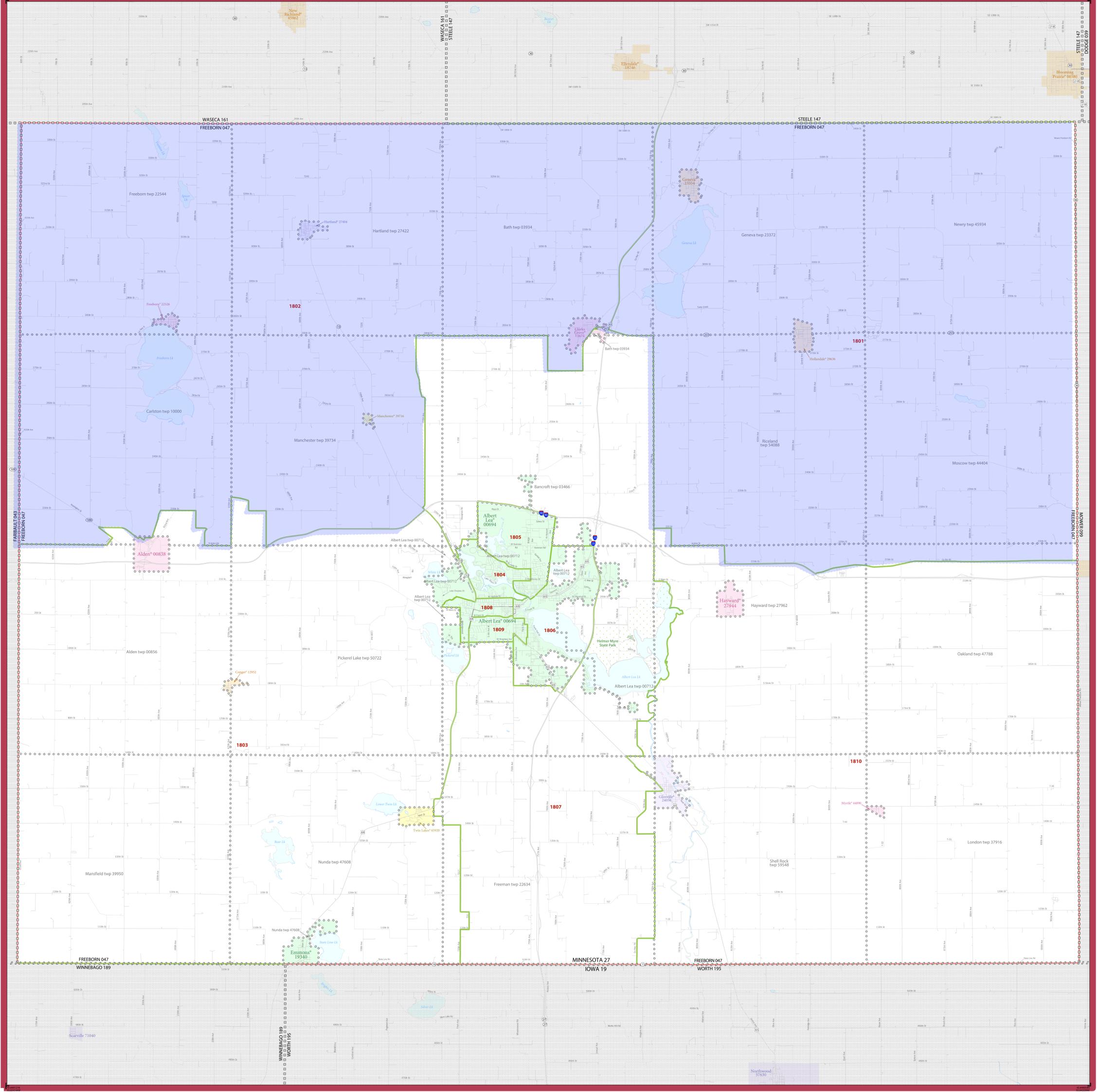
County: 147 - STEELE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2022 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
27	147	9601.00	Middle	No	117.25	\$83,600	\$98,021	\$87,632	5017	15.71	788	1475	1821
27	147	9602.00	Upper	No	136.12	\$83,600	\$113,796	\$101,738	6311	11.55	729	2048	2424
27	147	9603.00	Upper	No	123.15	\$83,600	\$102,953	\$92,044	6419	24.05	1544	1846	2163
27	147	9604.00	Middle	No	87.46	\$83,600	\$73,117	\$65,365	4351	33.65	1464	1057	1344
27	147	9605.00	Upper	No	121.18	\$83,600	\$101,306	\$90,568	2832	4.70	133	984	1217
27	147	9606.00	Middle	No	100.21	\$83,600	\$83,776	\$74,896	3571	14.45	516	1053	1324
27	147	9607.00	Upper	No	130.99	\$83,600	\$109,508	\$97,898	5295	9.90	524	1702	2030
27	147	9608.00	Middle	No	101.40	\$83,600	\$84,770	\$75,785	3610	9.20	332	1228	1521

* Will automatically be included in the 2023 Distressed or Underserved Tract List

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Freeborn County, MN



LEGEND

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International	☆☆☆☆	CANADA	Incorporated Place 1,2	■	Davis 18100
Federal American Indian Reservation	■■■■■■■■■■	L'ANSE RESVN 1880	Census Designated Place (CDP) ¹	■	Incline Village 35100
Oil Reservation Trust Land	■■■■■■■■■■	TI880	Census Tract ³	■	33.07
State American Indian Reservation	■■■■■■■■■■	Tama Resvn 9400			
Alaska Native Regional Corporation	▼▼▼▼▼▼	NANA ANRC 52120	DESCRIPTION	SYMBOL	DESCRIPTION
State (or statistically equivalent entity)		NEW YORK 36	Water Body	■	Interstate or U.S. Highway
County (or statistically equivalent entity)	□□□□	ERIE 029	College or University	■	State Highway or State Road
Minor Civil Division (MCD) ¹	○○○○○	Bristol town 07485	Military	■	Other Road
Census County Division (CCD), Census Subarea (CSA), or Unincorporated Territory (UT)	○○○○○	Hanna CCD 91650	4WD Trail, Stairway, Alley, Walkway or Ferry	■	Nonvisible Boundary or Feature Not Elsewhere Classified
Consolidated City	○○○○○	MILLFORD 47500	Prison or Juvenile Detention Center	■	Nonvisible Boundary or Feature Not Elsewhere Classified
			Natural or State Park, Forest, or Recreation Area	■	Inset Area
			Outside Subject Area	■	

Where international, state, county, and/or MCD/CCD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.

Geographic area names are followed by other their FIPS or census code.

1 A "*" following an MCD name denotes a false MCD. A "*" following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2 Place label color corresponds to the place fill color.

3 Census tracts are identified by an up to four-digit integer number and may have an optional two-digit suffix for example 23 or 1457.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 145702, respectively.

Due to space limitations, some road names, along with other feature and geography names on the map, may not be shown.

A1

All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Geographic Vintage: 2020 Census (reference date: January 1, 2020)
 Data Source: U.S. Census Bureau's MAJ/TIGER database (TAR20)
 Map Created by: Geography Division, January 06, 2021

Projection: Albers Equal Area Conic
 Datum: NAD 83
 Spheroid: GRS 80
 1st Standard Parallel: 44 28 52
 2nd Standard Parallel: 48 24 13
 Central Meridian: -93 21 39
 Latitude of Projection Origin: 43 30 01
 False Easting: 0
 False Northing: 0

Scale: 1:50,000
 The printed map scale is 1:50,000

Sheet 1 of 1 PARENT sheets
 Total Sheets: 1 (Index 0; Parent 1; Inset 0)

NAME: Freeborn County (047)
 ENTITY TYPE: County or statistically equivalent entity
 ST: Minnesota (27)

2020 CENSUS TRACT REF MAP (PARENT)
 Sheet ID: 249527047001

U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau

United States Census 2020

2022 FFIEC Census Report - Summary Census Demographic Information

State: 27 - MINNESOTA (MN)

County: 047 - FREEBORN COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2022 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
27	047	1801.00	Middle	No	110.01	\$83,600	\$91,968	\$82,222	2851	8.84	252	1038	1245
27	047	1802.00	Middle	No	107.71	\$83,600	\$90,046	\$80,500	2594	6.28	163	1017	1189
27	047	1803.00	Middle	No	110.55	\$83,600	\$92,420	\$82,629	3352	8.98	301	1196	1455
27	047	1804.00	Middle	No	108.38	\$83,600	\$90,606	\$81,000	3216	14.24	458	1105	1303
27	047	1805.00	Moderate	No	79.88	\$83,600	\$66,780	\$59,706	4350	18.71	814	1481	1791
27	047	1806.00	Moderate	No	71.47	\$83,600	\$59,749	\$53,419	4049	38.43	1556	1089	1567
27	047	1807.00	Upper	No	120.92	\$83,600	\$101,089	\$90,375	2440	11.64	284	780	966
27	047	1808.00	Moderate	No	68.75	\$83,600	\$57,475	\$51,382	2452	35.24	864	630	993
27	047	1809.00	Moderate	No	65.99	\$83,600	\$55,168	\$49,325	3416	28.69	980	888	1334
27	047	1810.00	Middle	No	93.66	\$83,600	\$78,300	\$70,000	2175	6.99	152	818	1035

* Will automatically be included in the 2023 Distressed or Underserved Tract List

Loan to Deposit Ratio

3/2023

2021

3/31/21	-	72.98%
6/30/21	-	67.56%
9/30/21	-	65.07%
12/31/21	-	71.95%

2022

3/31/22	-	72.29%
6/30/22	-	75.70%
9/30/22	-	74.01%
12/31/22	-	73.46%