PUBLIC DISCLOSURE

February 07, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Miners National Bank of Eveleth Charter Number: 6991

> 401 Grant Avenue Eveleth, MN 55734

Office of the Comptroller of the Currency

222 9th Street S 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.

Table of Contents

Overall CRA Rating	. 1
Description of Institution	2
Scope of the Evaluation	3
Discriminatory or Other Illegal Credit Practices Review	4
State Rating	4
State of Minnesota	4
Appendix A: Scope of ExaminationA-	-1
Appendix B: Summary of MMSA and State RatingsB-	-1
Appendix C: Definitions and Common AbbreviationsC-	-1
Appendix D: Tables of Performance DataD-	-1

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:

- Miners National Bank of Eveleth's (Miners) distribution of loans reflects excellent penetration among borrowers of different income levels;
- The bank's overall geographic distribution of loans reflects excellent dispersion throughout geographies of different income levels;
- The bank's average net loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, assessment area (AA) credit needs, and secondary market loan sales;
- The bank originated a majority of its loans inside its AA during the evaluation period; and
- The bank did not receive any Community Reinvestment Act (CRA) related complaints during the evaluation period.

Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable given the bank's size, financial condition, and credit needs of the AA. Miners' average quarterly LTD ratio is 50.2 percent for the 13 quarters since the previous CRA evaluation. The ratio ranged from a high of 60.1 percent in the fourth quarter of 2020 to a low of 40.3 percent in the first quarter of 2018. The following table depicts the average LTD ratios of similarly situated banks in the AA, with total assets ranging from approximately \$31 million to \$85 million. Miners ranks fourth among five similarly situated banks in the AA. However, the bank also sells a significant volume of loans to the secondary market. During the evaluation period, the bank originated and sold \$19.5 million in loans to the secondary market. These loans are not included in the LTD ratio and cause the bank's LTD ratio to appear artificially low. When adjusting for this significant volume of loans sold on the secondary market, the bank's adjusted LTD is reasonable.

Institution (Headquarters)	Assets as of 12/31/2020 (\$000s)	Average LTD Ratio (%) (4Q17 - 4Q20)
The First National Bank of Buhl (Mt. Iron, MN)	30,879	82.72
The First National Bank of Gilbert (Gilbert, MN)	66,193	77.17
Northern State Bank of Virginia (Virginia, MN)	85,024	79.45
The Miners National Bank of Eveleth (Eveleth, MN)	79,120	50.22
First National Bank (Chisholm, MN)	82,186	28.03

Lending in Assessment Area

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

The bank originated and purchased 82.6 percent of home mortgage loans by number inside the bank's AA during the evaluation period. The bank originated and purchased 72.8 percent of home mortgage loans by dollar volume inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

	I	Number o	of Loans		Total	Dollar A				
Loan Category	Insi	de	Out	side		Insic	le	Outsi	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2018	76	93.8	5	6.2	81	9,450	86.1	1,531	13.9	10,981
2019	85	84.2	16	15.8	101	10,981	76.3	3,413	23.7	14,393
2020	152	77.2	45	22.8	197	23,433	67.2	11,451	32.8	34,884
Subtotal	313	82.6	66	17.4	379	43,863	72.8	16,394	27.2	60,258
Total	313	82.6	66	17.4	379	43,863	72.8	16,394	27.2	60,258

Description of Institution

Miners is a \$79 million privately-owned, single-state national bank located in Eveleth, Minnesota. The bank has one full-service location that offers traditional banking products and services to individuals and businesses. The location also has an automated teller machine (ATM) and a drive-up. The ATM is not a deposit-taking ATM. The bank did not open or close any branches since the prior CRA evaluation. No merger or acquisition activities affected the bank during the evaluation period. The bank has no affiliates or subsidiaries.

Retail lending, including residential mortgages, continues to be the bank's primary focus. As of December 31, 2020, the bank's outstanding loan portfolio totaled \$43 million. The loan portfolio by dollar volume was comprised of 88 percent home mortgage loans, five percent business loans, and seven percent consumer loans.

Miners has one AA that includes 28 census tracts (CTs) within St. Louis County in northern Minnesota. This area is often referred to as the "Iron Range." The bank's AA is within the Duluth MN-WI multistate metropolitan statistical area (MMSA). The bank's AA reasonably excludes Duluth and the Wisconsin portions of the MMSA. The bank does not have a presence in these areas, and the areas would otherwise be too large for the bank to reasonably serve.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. Miners received a Satisfactory rating on its last CRA evaluation dated November 27, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Miners' CRA performance using small bank performance standards consisting of the Lending Test, which evaluates the bank's record of meeting the credit needs of its AA. The evaluation period for the lending inside the AA and the borrower and geographic distribution portions of the Lending Test covered January 1, 2018, through December 31, 2020. The LTD ratio analysis covered the quarters ending December 31, 2017, through December 31, 2020.

To determine the bank's lending performance, we selected a primary product based on the number and dollar volume of loan originations and purchases from 2018 through 2020. Home mortgage loans are the primary product for this evaluation as they represent 64 percent of loan originations and purchases by number and 88 percent by dollar. We relied on Home Mortgage Disclosure Act (HMDA) data to complete our home mortgage loan analysis. All home mortgage loans originated and purchased during the evaluation period were compared to the 2015 American Community Service (ACS) survey data.

We also reviewed the financial, economic, and environmental factors in the AA to provide context for the bank's lending performance. In addition, we contacted community members with knowledge of the economic conditions and demographics to gain insight on the credit needs of the AA.

Data Integrity

Prior to starting this evaluation, we independently reviewed the accuracy of Miners' publicly reported home mortgage data. We verified the data by testing a sample of HMDA reportable loans originated during the evaluation period. We determined the HMDA data was accurate and reliable. We used the HMDA data without exception in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state is selected for a fullscope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), MMSA, or combined statistical area (CSA) 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.

For the purposes of this evaluation, the bank only has one AA, the Iron Range AA. The AA received a full-scope review. Refer to the "Scope" section under the State Rating and Appendix A: Scope of Examination section, for more details on the AA.

Ratings

Miners' overall rating is based on the bank's lending performance within the State of Minnesota. It is the bank's only rating area. The state rating is based on performance in the Iron Range AA. We evaluated lending performance using the following performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different income levels, lending to geographies of different income levels, and responses to CRA-related complaints.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 Bureau of Consumer Financial Protection, 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 borrowers of different income levels is excellent.
- The distribution of loans throughout geographies of different income levels is excellent.

Description of Institution's Operations in Minnesota

The bank has one AA, and it is all contained in the State of Minnesota. The bank's AA includes 28 whole CTs within St. Louis County, which is part of the Duluth MN-WI MSA. The AA is comprised of nine moderate-income CTs, 18 middle-income CTs, and one upper-income CT. There are no low-income CTs within the bank's AA. The bank's AA includes the bank's only office location and the surrounding area. The bank has no other branches nor deposit-taking ATMs. The AA does not include the entire St. Louis County nor the entire MSA, which is reasonable given the size of the MSA and the bank's small footprint. The AA meets the regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) geographies.

Competition is strong within the bank's AA. As of June 30, 2021, the FDIC deposit share report indicated that Miners ranks 11th with 1.7 percent of the total deposit share within St. Louis County. The

bank's deposits totaled \$76 million. There were 20 institutions operating in the market at the time of the report. Large national banks control most of the market and operate several branches in the area. Wells Fargo has eight branches with \$1.3 billion or 29 percent of the market share. U.S. Bank has eight branches with \$422 million or 18 percent of the market share.

The 2015 ACS indicates the AA has a total population of 85,515. Approximately 29 percent live in a moderate-income CT, 63 percent in a middle-income CT, and the remaining eight percent live in the upper-income CT. The median family income is estimated at \$64,033. Approximately 10 percent of families living in the AA are below the poverty level. As of December 2020, the unemployment rate in St. Louis County was 5.8 percent according to the U.S. Bureau of Labor Statistics. The county's unemployment rate increased in 2020, beginning in March, and can be tied to the COVID-19 pandemic. The unemployment rate in Minnesota followed similar trends and ended 2020 at 4.9 percent, slightly lower than that of St. Louis County.

As part of this review, we contacted a member of the Eveleth community who participates in various local community-based organizations. The contact stated they believe local financial institutions were actively involved in the community and make reasonable efforts to provide the needed financing for local residents and businesses. The contact indicated that the supply of desirable residential properties, particularly for lower-income families, may contribute to reduced lending volume to individuals in that income category.

Table A – Demographic Information of the Assessment Area Assessment Area: Iron Range AA												
A Demographic Characteristics	Assessment . #	Area: Iron Low % of #	Range AA Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	28	0.0	32.1	64.3	3.6	0.						
Population by Geography	85,515	0.0	28.5	63.2	8.3	0.						
Housing Units by Geography	52,255	0.0	25.0	69.0	6.0	0.0						
Owner-Occupied Units by Geography	29,613	0.0	23.0	68.4	8.5	0.0						
Occupied Rental Units by Geography	8,437	0.0	51.8	46.0	2.2	0.0						
Vacant Units by Geography	14,205	0.0	13.1	84.0	2.9	0.0						
Businesses by Geography	6,338	0.0	31.0	60.9	8.1	0.0						
Farms by Geography	217	0.0	12.4	75.6	12.0	0.0						
Family Distribution by Income Level	23,097	21.5	19.5	22.7	36.3	0.0						
Household Distribution by Income Level	38,050	26.3	15.9	18.3	39.5	0.0						
Median Family Income MSA - 20260 Duluth, MN-WI MSA		\$64,033	Median Housi	\$128,03								
			Median Gross	Rent		\$554						
			Families Belov	w Poverty Lev	vel	10.0%						

The following table provides information on the Iron Range AA's demographic composition.

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

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

Scope of Evaluation in Minnesota

The Minnesota state rating is based solely on results from the Iron Range AA. As indicated previously, this is the bank's only AA, and it received a full-scope review. Lending Test conclusions were based on the bank's home mortgage lending since it is the bank's primary product.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State of Minnesota.

The geographic distribution conclusion is based on the bank's performance of lending to individuals located in geographies of different income levels within the Iron Range AA. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

Home Mortgage Loans

Refer to Table O 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.

The geographic distribution of home mortgage loans in the Iron Range AA is excellent. During the evaluation period, Miners exceeded the demographic comparator and significantly exceeded the aggregate lending data for home mortgage lending to borrowers located in moderate-income geographies within the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels.

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 distribution of home mortgage loans to borrowers of different income levels in the Iron Range AA is excellent. Miners originated 31.6 percent of home mortgage loans to LMI borrowers during the evaluation period, significantly exceeding the aggregate comparator.

Miners' home mortgage lending to moderate-income borrowers was excellent. The bank exceeded both the demographic comparator and aggregate lending data.

Miners' home mortgage lending to low-income borrowers was below the demographic comparator but exceeded the aggregate comparator. Aggregate lending to low-income borrowers was also well below the percentage of low-income families in the AA. This shows that other banks in the AA also have difficulty lending to this segment of the population. In the AA, 10 percent of families are below poverty level. Families in poverty are less likely to be able to afford a home and qualify for a home mortgage loan. The median housing value in the AA is \$128,035 and a low-income family made approximately \$32,000 per year. The competitive home buying market is raising home values and has resulted in a lack of affordable housing inventory that makes it difficult for low-income borrowers to purchase a home. Considering this additional performance context, Miners' lending to low-income borrowers is reasonable.

Responses to Complaints

There were no CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the AAs 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:	(01/01/18 to 12/31/20)										
Bank Products Reviewed:	Home mortgage										
List of Assessment Areas and Type of Examination											
Rating and Assessment Areas	Type of Exam	Other Information									
Minnesota											
Iron Range AA	Full scope	AA includes 28 census tracts in St. Louis County									

Appendix B: Summary of MMSA and State Ratings

RATINGSTHE MINERS	S NATIONAL BANK OF EVELETH
Overall Bank:	Lending Test Rating
Miners National 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.

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 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.

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.

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.

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.

	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregat
Iron Range AA	313	43,863	100.0	3,309	0.0	0.0	0.0	23.0	26.5	20.5	68.4	73.2	65.4	8.5	0.3	14.1	0.0	0.0	0.0
Total	313	43,863	100.0	3,309	0.0	0.0	0.0	23.0	26.5	20.5	68.4	73.2	65.4	8.5	0.3	14.1	0.0	0.0	0.0

Assessmen t 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	Aggregat
Iron Range AA	313	43,863	100.0	3,309	21.5	10.5	8.6	19.5	21.1	17.3	22.7	30.0	22.4	36.3	38.0	35.9	0.0	1.3	15.7
Total	313	43,863	100.0	3,309	21.5	10.5	8.6	19.5	21.1	17.3	22.7	30.0	22.4	36.3	38.0	35.9	0.0	1.3	15.7