

COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC 300 South Riverside Plaza, Suite 1700 Chicago, IL 60606-3447. You may send written comments about our performance in helping to meet community credit needs to CRA Officer 207 W Lincoln Street PO Box 461 Augusta, WI 54722, and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Kimberly Leasing Corporation a bank holding company. You may request from the Federal Reserve Bank of Minneapolis, PO Box 291, 90 Hennepin Ave, Minneapolis, MN 55480-0291 an announcement of applications covered by the CRA filed by bank holding companies.

PUBLIC DISCLOSURE

January 19, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Unity Bank Certificate Number: 8714
207 W Lincoln St Augusta, Wisconsin 54722

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

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and credit needs in the AAs.
- The bank originated a substantial majority of its small business, small farm, and home mortgage loans in the AAs.
- The geographic distribution of small business, small farm, and home mortgage loans reflects reasonable dispersion throughout the AAs, including in low- and moderate-income census tracts.
- The distribution of borrowers reflects reasonable penetration of loans among businesses and farms of different sizes and individuals of different income levels.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

The Community Development Test is rated Satisfactory.

The institution's community development performance demonstrates adequate responsiveness to community development needs in its AAs primarily through community development loans and, to a lesser extent, qualified investments and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's AAs.

DESCRIPTION OF INSTITUTION

Unity Bank is headquartered in Augusta, Wisconsin, and is wholly owned by Kimberly Leasing Corporation, a one-bank holding company, also in Augusta. Unity Bank is affiliated with PSB of Augusta Banc Building Corporation and Unity Insurance & Investment Services, Inc. through common ownership by the holding company. No affiliates offer lending activities; therefore, affiliate activities are not considered in the review. No merger or acquisition activities have occurred since the previous evaluation. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation, dated May 2, 2022, based on Interagency Intermediate Small Institution Examination Procedures.

There has been no branching activity since the last CRA evaluation. Unity Bank continues to operate out of 16 offices in three states. Specifically, in Minnesota, the bank operates nine full-service branches, one limited-service branch, and one loan and deposit production office. In Wisconsin, the bank operates four full-service branches. In Montana, the bank operates one full-service branch in Polson.

Unity Bank offers a variety of credit and deposit services to businesses, farms, and consumers. Loan offerings include commercial, agricultural, home mortgage, and consumer loans. The bank sells qualifying home loans to secondary market investors and participates in various government-

sponsored loan guarantee programs offered by the Small Business Administration (SBA) and the Farm Service Agency. Deposit services include checking, savings, individual retirement accounts, health savings accounts, and certificates of deposit. The bank has eight deposit-taking ATMs located in Minnesota and Wisconsin. The bank complements its traditional service offerings with alternative banking services such as web banking, automated bill payment, mobile banking, and peer-to-peer payments.

Unity Bank's main lending focus is commercial, agricultural, and residential real estate lending. According to the March 31, 2024, Call Report, Unity Bank reported total assets of \$620.7 million, total loans of \$523.5 million, and total deposits of \$525.7 million. Commercial and agricultural credits are the predominant loan products by dollar volume, representing 46.5 percent and 31.8 percent of the loan portfolio, respectively. Portfolio lending volume is presented in the following table.

Loan Portfolio Distribution as of 3/31/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	14,249	2.7
Secured by Farmland	120,161	23.0
Secured by 1-4 Family Residential Properties	66,272	12.7
Secured by Multifamily (5 or more) Residential Properties	13,580	2.6
Secured by Nonfarm Nonresidential Properties	203,868	38.9
Total Real Estate Loans	418,130	79.9
Commercial and Industrial Loans	39,471	7.5
Agricultural Production and Other Loans to Farmers	46,418	8.9
Consumer Loans	18,297	3.5
Obligations of State and Political Subdivisions in the U.S.	2,981	0.6
Other Loans	44	0.0
Lease Financing Receivable (net of unearned income)	(1,839)	(0.4)
Total Loans	523,502	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the credit needs of its AAs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate CRA performance. Unity Bank has designated eight AAs within the states of Minnesota, Wisconsin, and Montana, which results in the institution having three rated areas. The AAs are unchanged from the previous evaluation. The following table illustrates a breakdown of deposits and branches by AA. Refer to the individual AA sections for more details.

Assessment Area Breakdown of Deposits and Branches					
Assessment Area Name	Counties in Assessment Areas	Banking Offices		Deposits as of 6/30/2023	
		#	%	\$(000s)	%
MINNESOTA					
Minnesota Central Non-Metropolitan Statistical Area (MSA)	Aitkin, Cass, Crow Wing, Kanabec, Morrison, Otter Tail, Pine, Todd, and Wadena	5	31.3	115,650	22.3
Minnesota North Non-MSA	Red Lake and Pennington	2*	12.5	42,219	8.1
Minneapolis-Saint Paul MSA - North East	Chisago, Isanti, and Mille Lacs	1	6.3	72,005	13.9
Minneapolis-Saint Paul MSA - Hennepin	Hennepin County (partial)	2	12.5	26,227	5.1
Grand Forks MSA	Polk	1	6.3	16,356	3.2
WISCONSIN					
Eau Claire MSA	Eau Claire	3	18.8	186,866	36.0
Wisconsin Non-MSA	Clark and Jackson	1	6.3	38,732	7.5
MONTANA					
Montana Non-MSA	Lake	1	6.3	20,740	4.0
Totals		16	100	518,795	100
Sources: Bank Records; Summary of Deposits 6/30/2023. Due to rounding, percentages may not equal 100 %.					
* Includes a location that is a loan and deposit production office					

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated May 2, 2022, to the current evaluation dated June 3, 2024. Examiners used Interagency Intermediate Small Institution Examination Procedures to evaluate Unity Bank's CRA performance, which includes the Lending Test and Community Development Test. Refer to the Appendices for a description of these tests.

Minnesota, Wisconsin, and Montana are the three rated states, and within these three states are eight AAs that are included in this evaluation. There are five AAs in Minnesota, of which three received a full-scope review and two received a limited-scope review. The bank has two AAs in Wisconsin, both of which received a full-scope review. The sole AA in Montana received a full-scope review. Examiners ensured the AAs that received a full-scope review included the majority of the branches, deposits, and lending activities. Also, examiners conducted a full-scope review of two AAs that did not receive a full-scope review at the previous two CRA evaluations.

Utilizing the Interagency Intermediate Small Institution Examination Procedures, examiners reviewed the bank's primary lending products and all community development activities. Specifically, examiners reviewed 2023 small business, 2023 small farm, and 2022 and 2023 home mortgage loans under the Lending Test in each AA. The bank's community development activities between the prior evaluation and the current evaluation were evaluated under the Community Development Test in each AA.

Examiners evaluated the bank's CRA performance for each individual AA, with conclusions drawn for each state and on overall performance. Considering a variety of factors including branch locations and overall deposit and lending activities, lending performance in Minnesota received slightly more weight than Wisconsin, and Montana received the least amount of weight given the limited activities and locations in that state. This evaluation includes state level ratings for Minnesota, Wisconsin, and Montana. Each state rating is comprised of one or more AAs as detailed in the state sections of the evaluation. The weighting of the AAs is discussed in each individual state section. AAs selected for limited-scope review did not contribute significantly to the overall lending volume or deposit taking activities when compared with the AAs selected for full-scope reviews.

Activities Reviewed

Examiners determined that the bank's major product lines are small business, small farm, and home mortgage. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. No other loan types, such as consumer loans, represent a major product line. Therefore, examiners did not analyze these loan types, as they provided no material support for conclusions or ratings.

For Minnesota and Wisconsin, Unity Bank's Lending Test performance is based on a review of small business and small farm loans in 2023 and home mortgage loans in 2022 and 2023. The bank's record of originating small business and small farm loans contribute equal weight to overall

conclusions, due to similar loan volume and larger loan volume when compared to home mortgage lending during the evaluation period.

The weighting of the products is generally consistent with some exceptions. Small farm loan performance is not assessed or presented for the Minneapolis-Saint Paul MSA - Hennepin AA given the nominal level of small farm lending opportunities evidenced by a very limited presence of farms operating within the AA. Unity Bank did not originate any small farm loans in this AA in 2023.

Additionally, Unity Bank's Lending Test performance in Montana is based solely on a review of small business loans in 2023. Small farm and home mortgage loan performance is not assessed or presented given the bank's limited presence in the market paired with the nominal level of small farm and home mortgage lending opportunities evidenced by demographic data within the Montana Non-MSA AA. Unity Bank only originated one small farm loan in 2023 and one home mortgage loan combined in 2022 and 2023 in this AA.

Refer to the individual AA sections for more details on economic, demographic, competition, and credit needs data.

Examiners considered Call Report data, the number and dollar volume of reported loans during the evaluation period, and lending focus in determining the weighting of the products. Bank records and discussions with management indicate that the lending focus remained consistent throughout the evaluation period.

Examiners considered all small business and small farm loan data for 2023 collected by the bank. Examiners determined that 2023 performance is representative of the performance throughout the evaluation period. Unity Bank is not required to collect or report small business and small farm data, but it has elected to collect starting in 2023 and not report. The bank originated 243 small business loans totaling \$28.0 million and 258 small farm loans totaling \$23.6 million in 2023. D&B data for 2023 provided a standard of comparison for small business and small farm loans.

This evaluation considered all home mortgage loans reported on the bank's 2022 and 2023 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). The bank reported 98 loans totaling \$17.4 million in 2022, and 47 loans totaling \$9.1 million in 2023. Aggregate data and 2020 U.S. Census demographic data provided standards of comparison for the bank's home mortgage loans.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation dated May 2, 2022, through the current evaluation date of June 3, 2024. Prior period investments that remain on the bank's books as of June 3, 2024, are included at their current book value. When determining the Community Development Test rating, examiners evaluated the bank's community development loans, qualified investments, and community development services in the context of available bank resources and opportunities in the AAs.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test. LTD ratio, AA Concentration, Geographic Distribution, and Borrower Profile performance supports this conclusion.

Loan-to-Deposit Ratio

The average net LTD ratio is reasonable given the institution's size, financial condition, and AA credit needs. The average net LTD ratio is 93.0 percent, based on the eight quarters from June 30, 2022, to March 31, 2024. The net LTD ratio fluctuated over the evaluation period, ranging from a low of 81.9 percent on June 30, 2022, to a high of 98.2 percent on September 30, 2023.

Unity Bank maintained a ratio that is higher than the ratios of five similarly situated banks and reflects reasonable performance in this criterion. The similarly situated institutions' average net LTD ratios range from a low of 48.6 percent to a high of 91.8 percent over the same period. These institutions are local banks ranging in asset size from \$644 million to \$1.0 billion that have comparable market areas, lending focus, and loan product offerings.

Assessment Area Concentration

A substantial majority of loans and other lending related activities are in the institution's AAs.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	\$
Small Business										
2023	234	96.3	9	3.7	243	25,053	89.6	2,900	10.4	27,953
Small Farm										
2023	257	99.6	1	0.4	258	23,526	99.9	30	0.1	23,556
Home Mortgage										
2022	73	74.5	25	25.5	98	11,084	63.7	6,319	36.3	17,403
2023	37	78.7	10	21.3	47	4,436	49.0	4,616	51.0	9,052
Subtotal	110	75.9	35	24.1	145	15,520	58.7	10,935	41.3	26,455
Source: Bank Data. Due to rounding, totals may not equal 100.0%										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the institution's AAs. Performance is consistent throughout the rated areas as the geographic distribution performance in Minnesota, Wisconsin, and Montana is reasonable. Examiners emphasize the bank's record of lending in moderate-income census tracts within the AAs for the Geographic Distribution analysis.

Examiners reviewed only those loans extended within the AAs to perform this analysis. A complete discussion of the bank's geographic distribution lending performance is in the individual AA sections.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels, including low- and moderate-income individuals. Performance is consistent throughout the rated areas as the borrower profile performance in Minnesota, Wisconsin, and Montana is reasonable. Examiners focused on the percentage by number of small business and small farm loans to entities with gross annual revenues (GARs) of \$1 million or less. The review also focused on the percentage by number of home mortgage loans to low- and moderate-income families. Examiners reviewed only those loans extended within the AAs to perform this analysis. A complete discussion of the bank's borrower profile lending performance is in the individual AA sections.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

The institution's community development performance demonstrates adequate responsiveness to community development needs in its AAs. Performance is primarily supported through community development loans and to a lesser extent through qualified investments and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's AAs.

Community Development Loans

Unity Bank originated 22 community development loans totaling \$8.6 million in the AAs and 8 community development loans totaling \$26.7 million in the broader statewide or regional area during the evaluation period. A large percentage of community development loans by dollar is outside of the AAs. Despite this, the number and dollar amount of community development loans in the broader statewide or regional area are considered as examiners determined Unity Bank has generally been responsive to the community development needs and opportunities in its AAs consistent with similarly situated banks. This level of community development lending represents 5.9 percent of average total assets and 7.2 percent of average net loans.

Examiners compared performance to five institutions that are similar in size, portfolio, and operate within the bank's AAs. Notably, each of the similarly situated banks originated several SBA Paycheck Protection Program (PPP) loans during their respective evaluation periods that qualified as community development loans. Given that the SBA PPP was not available during Unity Bank's evaluation period, examiners excluded SBA PPP loans from the other institutions' community development loan performance percentages for comparison purposes. Additionally, considering differing lengths of examination review periods for the similarly situated institutions, examiners completed the quantifiable analysis on an annualized basis. Annualized, Unity Bank's level of lending represents 2.8 percent of average total assets and 3.5 percent of average net loans. The similarly situated banks' annualized community development performance ranged from 0.9 percent to 2.8 percent of average total assets and from 1.2 percent to 4.1 percent of average net loans. Unity Bank's performance is near the top of both ranges.

The following tables show the breakdown of community development loans by year and rated area.

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (partial)	0	0	4	2,665	3	2,725	2	8,125	9	13,515
2023	2	2,349	5	3,688	3	5,844	9	9,464	19	21,345
YTD 2024	0	0	0	0	0	0	2	425	2	425
Total	2	2,349	9	6,353	6	8,569	13	18,014	30	35,285
<i>Source: Bank Data</i>										

Community Development Lending by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Minnesota	0	0	0	0	3	5,844	12	17,864	15	23,708
Wisconsin	1	77	9	6,353	1	115	0	0	11	6,545
Montana	0	0	0	0	0	0	1	150	1	150
Regional Activities	1	2,272	0	0	2	2,610	0	0	3	4,882
Total	2	2,349	9	6,353	6	8,569	13	18,014	30	35,285
<i>Source: Bank Data</i>										

Notable examples of community development loans originated in regional areas include the following:

- In 2023, the bank originated a \$2.3 million loan for the purchase of a manufactured home community offering affordable rentals in the Midwest region of the United States.
- In 2022, the bank originated a \$1.2 million SBA 504 loan in the Western region of the United States. The SBA 504 loan program provides long-term, fixed rate financing for major fixed assets that promote business growth and job creation.

Qualified Investments

Unity Bank made 13 qualified investments totaling \$705,245. Of these, two were prior period municipal bonds, one with a current book value of \$680,000 benefitting a Minnesota AA and one with a current book value of \$23,248 benefitting the Montana AA. The remaining 11 totaling \$1,997 were donations to local non-profit organizations with their primary purpose being affordable housing, community services, economic development, or revitalize or stabilize. All donations benefitted the Minnesota rated area.

The dollar amount of qualified investments equates to 0.1 percent of average total assets, 1.2 percent of average total securities, and 1.2 percent of total equity capital. Annualized, this performance represents 0.1 percent of average total assets, 0.6 percent of average total securities, and 0.6 percent of total equity capital.

The five similarly situated banks' annualized qualified investment performance ranged from 0.0 percent to 0.9 percent of average total assets, from 0.1 percent to 3.5 percent of average total

securities, and from 0.2 percent to 15.1 percent of total equity capital. Unity Bank's performance is near the bottom of all ranges.

Community Development Services

During the evaluation period, bank employees provided 18 instances of financial expertise or technical assistance to 14 different entities in the AA or statewide area. The following table illustrates the bank's community development services by rated area and purpose.

Unity Bank's performance equates to about 9 community development services per year. The four similarly situated banks that track community development services by number of instances range from 6 to 68 community development services per year. Unity Bank's performance is near the bottom of this range.

Community Development Services by Rated Area					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Minnesota	0	10	5	1	16
Wisconsin	1	1	0	0	2
Montana	0	0	0	0	0
Total	1	11	5	1	18
Source: Bank Data					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's CRA rating.

STATE OF MINNESOTA – Full Scope Review

CRA RATING FOR THE STATE OF MINNESOTA: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF MINNESOTA

Unity Bank has five AAs in the State of Minnesota, which have not changed since the prior evaluation. Examiners gave more weight to the Minnesota Central Non-MSA AA and Minneapolis-Saint Paul MSA – North East AA due to greater volumes of lending and deposit activity when compared to the other Minnesota AAs.

Unity Bank operates 11 banking offices in Minnesota. The five AAs encompass full counties, except for the Hennepin County AA in the Minneapolis-Saint Paul MSA. For the Hennepin County AA, census tracts in the communities of Edina and Bloomington where the bank has branches were included. Furthermore, the Minneapolis-Saint Paul MSA includes two non-contiguous AAs, the Minneapolis St. Paul MSA – Hennepin AA and Minneapolis-Saint Paul MSA – North East AA, which includes Chisago, Isanti, and Mille Lacs Counties.

Data sources used in this section are as follows: Federal Financial Institutions Examination Council (FFIEC) Median Family Income data, 2020 U.S. Census data, 2023 D&B data, loan information reported under the HMDA, 2022 USDA Census of Agriculture data, U.S. Bureau of Labor Statistics, and other readily available public information.

SCOPE OF EVALUATION – STATE OF MINNESOTA

Examiners reviewed small business, small farm, and home mortgage lending in all but one of the Minnesota AAs. As noted previously, the Minneapolis St. Paul MSA - Hennepin AA only includes a review of small business and home mortgage lending. Examiners conducted a full-scope review of the Minnesota Central Non-MSA AA, the Minneapolis-Saint Paul MSA - North East AA, and the Grand Forks MSA AA. Examiners conducted a limited-scope review of the Minnesota North Non-MSA AA and the Minneapolis-Saint Paul MSA – Hennepin AA. Refer to the overall Scope of Evaluation section for information about the review procedures used and the weighting of the products.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE STATE OF MINNESOTA

LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test in the state of Minnesota. The Geographic Distribution and Borrower Profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Minnesota AAs. Overall, the bank has a reasonable lending performance in making small business, small farm, and home mortgage loans in moderate-income census tracts in Minnesota. However, performance is not consistent among the AAs. While the geographic distribution of loans in the Minneapolis-Saint Paul MSA - North East AA is excellent, reasonable performance in the Minnesota Central Non-MSA AA carried the greatest weight in the overall conclusion. The Grand Forks MSA AA, Minnesota North Non-MSA AA, and the Minneapolis-Saint Paul MSA – Hennepin AA do not have any low- or moderate-income census tracts. Therefore, the Geographic Distribution criterion was not evaluated for these areas.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels. The performance for small business, small farm, and home mortgage loans in the AAs with full-scope reviews primarily support this conclusion. While performance was excellent in the Minneapolis-Saint Paul MSA - North East AA, reasonable performance in the Minnesota Central Non-MSA AA and the Grand Forks MSA AA determined the overall reasonable rating.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance demonstrates adequate responsiveness to community development needs in its AAs through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's AAs. Performance was not consistent among AAs. Performance in the Minnesota Central Non-MSA AA carried the greatest weight in this conclusion.

Community Development Loans

Unity Bank originated 10 community development loans totaling \$1.9 million in the Minnesota AAs and 5 community development loans totaling \$21.8 million in the broader Minnesota statewide area during the evaluation period. The following table shows the breakdown of community development loans by year.

Community Development Lending – Minnesota					
	Affordable Housing	Community Services	Economic Development	Revitalize or	Totals

Activity Year							Stabilize			
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (partial)	0	0	0	0	0	0	2	8,125	2	8,125
2023	0	0	0	0	3	5,844	9	9,464	12	15,308
YTD 2024	0	0	0	0	0	0	1	275	1	275
Total	0	0	0	0	3	5,844	12	17,864	15	23,708
<i>Source: Bank Data</i>										

Notable examples of community development loans originated in the statewide area include the following:

- In 2022, the bank purchased an \$8 million claim into a loan issued by another lender for constructing a multifamily housing structure located in a designated Opportunity Zone in Ramsey County. Opportunity Zones are a community development program established to encourage long-term investments in low-income and urban communities nationwide.
- In 2023, the bank purchased an \$8 million claim into a loan issued by another lender for constructing a multifamily housing structure located in a designated Opportunity Zone in Hennepin County.

Qualified Investments

Unity Bank made 12 qualified investments totaling \$681,997 in the Minnesota AAs. Unity Bank made one 2022 donation of \$250 with the primary purpose of community services and two donations in 2023 totaling \$350 with the primary purpose of community services. In 2024, the bank made eight donations totaling \$1,397 with the primary purposes spread out between all community development categories. In addition to the donations, Unity Bank has one prior period bond with a current book value of \$680,000.

Community Development Services

During the evaluation period, bank employees provided 16 instances of financial expertise or technical assistance to 12 different entities in the Minnesota AAs. The following table illustrates the bank's community development services by year and purpose.

Community Development Services - Minnesota					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022 (partial)	0	5	4	1	10
2023	0	4	1	0	5
YTD 2024	0	1	0	0	1
Total	0	10	5	1	16
<i>Source: Bank Data</i>					

MINNESOTA CENTRAL NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINNESOTA CENTRAL - NON-MSA AA

The Minnesota Central Non-MSA AA includes all census tracts in Aitkin, Cass, Crow Wing, Kanabec, Morrison, Otter Tail, Pine, Todd, and Wadena Counties. One of the five branches in the AA is in a moderate-income census tract, while the other four are in middle-income census tracts. The five branches in this AA are in Todd, Morrison, and Crow Wing Counties.

Economic and Demographic Data

According to 2020 U.S. Census data, the Minnesota Central Non-MSA AA is comprised of 20 moderate-, 65 middle-, and 4 upper-income census tracts. One bank branch is located in a moderate-income census tract and six additional moderate-income census tracts are in the counties that the bank operates; however, the majority of moderate-income census tracts are in counties that the bank does not have operations and not in close proximity to bank branches. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Assessment Area: Minnesota Central Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	0.0	22.5	73.0	4.5	0.0
Population by Geography	290,212	0.0	24.6	70.2	5.2	0.0
Housing Units by Geography	183,881	0.0	23.5	72.9	3.6	0.0
Owner-Occupied Units by Geography	95,680	0.0	21.3	73.6	5.1	0.0
Occupied Rental Units by Geography	24,396	0.0	44.5	52.0	3.5	0.0
Vacant Units by Geography	63,805	0.0	18.9	79.9	1.2	0.0
Businesses by Geography	28,625	0.0	25.6	69.0	5.4	0.0
Farms by Geography	2,458	0.0	15.5	78.2	6.2	0.0
Family Distribution by Income Level	78,126	20.9	20.6	22.7	35.8	0.0
Household Distribution by Income Level	120,076	24.1	17.9	18.9	39.1	0.0
Median Family Income Non-MSAs - MN		\$74,737	Median Housing Value			\$198,837
			Median Gross Rent			\$742
			Families Below Poverty Level			7.0%

According to 2023 D&B data, service industries represent the largest portion of businesses at 32.3 percent; followed by non-classifiable establishments at 15.1 percent; retail trade at 11.3 percent; and construction at 10.6 percent. In addition, 69.3 percent of AA businesses have four or fewer employees, and 91.7 percent operate from a single location.

According to the 2022 USDA Census of Agriculture, approximately 66.2 percent of AA farms did not report interest expense, and approximately 59.3 percent of farm owners listed an occupation other than farming as their primary occupation.

Examiners used the FFIEC-estimated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the Minnesota Non-MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
MN NA Median Family Income (99999)				
2022 (\$83,600)	<\$41,800	\$41,800 to <\$66,880	\$66,880 to <\$100,320	≥\$100,320
2023 (\$90,400)	<\$45,200	\$45,200 to <\$72,320	\$72,320 to <\$108,480	≥\$108,480
Source: FFIEC				

During the review period, as reflected in the table that follows, levels of unemployment within the AA were higher than state and national unemployment rates. Unemployment rates within the AA increased slightly, on average, between 2022 and 2023, while state and national annual unemployment rates remained relatively consistent.

Unemployment Rates			
Area	2022	2023	April 2024
	%	%	%
Aitkin County	4.3	4.8	5.2
Cass County	4.0	4.4	4.6
Crow Wing County	3.1	3.4	3.3
Kanabec County	4.5	5.0	5.2
Morrison County	4.2	4.4	4.5
Otter Tail County	2.9	3.3	3.1
Pine County	4.2	4.9	5.3
Todd County	3.1	3.6	3.3
Wadena County	4.0	4.7	4.6
State	2.7	2.8	2.7
National Average	3.6	3.6	3.5
Source: Bureau of Labor Statistics			

Competition

There is a high level of competition for financial services in this nine county AA. As of June 30, 2023, FDIC deposit market share data shows 46 financial institutions operating 120 offices in the AA. Of those institutions, Unity Bank ranked 22nd with 1.7 percent of the deposit market share. The top three institutions accounted for 23.5 percent of the deposit market share.

Unity Bank is not required to report its small business or small farm loan data, and it has elected not to do so; however, aggregate loan data is nonetheless helpful in determining the level of competition for such loans in the AA. Aggregate small business loan data from 2022 illustrates a high level of competition, and aggregate small farm loan data illustrates a moderate level of

competition. In 2022, 80 lenders reported 4,901 small business loan originations in the AA. In 2022, 26 lenders reported 780 small farm loan originations in the AA.

There is a high level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 361 lenders originated 7,730 home mortgage loans in the AA. Of those lenders, Unity Bank ranked 55th with 0.3 percent of the home mortgage market share.

Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying credit needs. The information helps determine whether local financial institutions are responsive to these needs. Examiners utilized a recent community contact conducted with a community development organization that serves the AA.

The contact noted that the economy is stable. While the economy is influenced by outside trends, the agriculture production is a major economic driver regionally.

Credit and Community Development Needs and Opportunities

Considering information from the community contact and demographic and economic data, examiners determined the AA has primary credit needs for small business, small farm, and home mortgage lending, including start-up business financing and flexible loan programs. The significant percentages of businesses and farms with GARs of \$1 million or less support the need for small business and small farm lending. Primary community development needs include economic development and affordable housing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MINNESOTA CENTRAL NON-MSA AA

LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test for this AA. Geographic Distribution and Borrower Profile performances primarily support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Reasonable performance in small business, small farm, and home mortgage lending supports an overall reasonable rating. Examiners focused on the percentage by number of loans in the moderate-income census tracts and comparisons to available demographic and aggregate data. In the following analyses, examiners considered the location of the moderate-income census tracts in relation to bank branches. Specifically, examiners note that 13 of the 20 moderate-income census tracts are within counties where the bank has no branch locations.

Small Business Loans

Geographic Distribution of 2023 Small Business Loans

Assessment Area: Minnesota Central Non-MSA

Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	25.6	9	11.3	719	6.3
Middle	69.0	66	82.5	9,670	85.0
Upper	5.4	5	6.3	994	8.7
Totals	100.0	80	100.0	11,383	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The geographic distribution of small business loans reflects reasonable dispersion in this AA. The table above shows the bank's percentage by number of loans originated in moderate-income tracts trails demographics by 14.4 percentage points in 2023. Although Unity Bank does not report small business lending data, 2022 aggregate data, the most recent reported data at the time of the evaluation, shows that 22.6 percent of AA small business lending originated in moderate-income tracts.

Unity Bank's lending activity is strongest in the moderate-income tracts located near their branches, with seven of the nine moderate-income tract loans made in the counties with a bank branch.

Notably, more than half of the businesses located within the moderate-income census tracts in this AA are in the counties that Unity Bank does not have a branch. Further, there is a notable level of competition from other lenders in closer proximity to the businesses in the moderate-income census tracts located in the counties that Unity Bank does not have a branch. Examiners plotted small business loans in the AA and confirmed there are no conspicuous gaps in the dispersion of loans.

Based on demographics, AA opportunities, competition, and locations of moderate-income census tracts relative to the bank's branches, Unity Bank's dispersion of small business loans reflects reasonable performance.

Small Farm Loans

Geographic Distribution of 2023 Small Farm Loans					
Assessment Area: Minnesota Central Non-MSA					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	15.5	8	7.3	240	2.4
Middle	78.2	85	78.0	6,449	63.5
Upper	6.2	16	14.7	3,467	34.1
Totals	100.0	109	100.0	10,156	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The geographic distribution of small farm loans reflects reasonable dispersion in this AA. The preceding table shows the bank's percentage by number of loans originated in moderate-income

tracts trails demographics by 8.2 percentage points. Although Unity Bank does not report small farm lending data, 2022 aggregate data shows that 12.1 percent of AA small farm lending originated in moderate-income tracts.

Unity Bank’s lending activity is strongest in the moderate-income tracts surrounding the branches, with seven of the eight moderate-income census tract loans located in that proximity. Notably, more than half of the farms located within the moderate-income census tracts in this AA are in the counties that Unity Bank does not have a branch. Further, there is a notable level of competition from other lenders in closer proximity to the farms in the moderate-income census tracts located in the counties that Unity Bank does not have a branch. Examiners plotted small farm loans in the AA and confirmed there are no conspicuous gaps in the dispersion of loans. Based on demographics, AA opportunities, competition, and locations of moderate-income census tracts relative to the bank’s branches, Unity Bank's dispersion of small farm loans reflects reasonable performance.

Home Mortgage Loans

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Minnesota Central Non-MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate						
2022	21.3	22.5	6	24.0	595	16.4
2023	21.3	--	0	0.0	0	0.0
Middle						
2022	73.6	72.3	17	68.0	2,496	68.6
2023	73.6	--	14	93.3	1,797	88.7
Upper						
2022	5.1	5.1	2	8.0	548	15.1
2023	5.1	--	1	6.7	230	11.3
Totals						
2022	100.0	100.0	25	100.0	3,640	100.0
2023	100.0	--	15	100.0	2,027	100.0
<i>Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout this AA. The table above shows that Unity Bank’s percentage of home mortgage loans in moderate-income census tracts exceeds aggregate and the demographic benchmark. Given the distance from the moderate-income census tracts within the AA and the competition for home mortgages, the 2022 performance is strong. Despite the strong 2022 performance, the bank did not originate any home mortgage loans in the moderate-income tracts in 2023 which reflects poor performance in that calendar year. Considering the bank’s office locations, moderate-income census tract locations, competition, credit opportunities, aggregate data and demographic data, the bank's geographic distribution of home mortgage loans throughout the AA is reasonable.

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels. The bank's reasonable performance of small business and small farm lending supports this conclusion. Despite poor home mortgage performance, the small business and small farm lending performance contribute more weight to overall conclusions.

Small Business Loans

Distribution of 2023 Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Minnesota Central Non-MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	87.3	68	85.0	9,551	83.9
>\$1,000,000	3.2	12	15.0	1,832	16.1
Revenue Not Available	9.4	0	0.0	0	0.0
Totals	100.0	80	100.0	11,383	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of small business loans reflects reasonable penetration among businesses with GARs of \$1 million or less. The above table shows that performance is consistent with the demographic benchmark.

Small Farm Loans

Distribution of 2023 Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: Minnesota Central Non-MSA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	98.2	90	82.6	7,280	71.7
>\$1,000,000	1.0	19	17.4	2,876	28.3
Revenue Not Available	0.8	0	0.0	0	0.0
Totals	100.0	109	100.0	10,156	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of small farm loans reflects reasonable penetration among farms with GARs of \$1 million or less. Although the bank's performance trails the demographic by 15.6 percentage points, traditional small farm credit demands also trail the demographics. The demographic data represents the percentage of farms of different sizes operating within the AA but does not represent the percentage of farms seeking financing.

Over half of all AA farms carry no debt, and according to the 2022 USDA Census of Agriculture data, 59.3 percent of the producers in the AA do not report farming as their primary occupation. Additionally, 66.2 percent of the farming operations did not report interest expenses, which suggests that more than half of AA farms avoid debt secured by farm collateral.

Although Unity Bank does not report small farm lending data, 2022 aggregate data shows that 63.6 percent of small farm loans originated were to farms with GARs of \$1 million or less. Unity Bank's performance is significantly higher than the aggregate performance. For the reasons discussed above, Unity Bank's performance is reasonable.

Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Minnesota Central Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	20.9	8.9	2	8.0	81	2.2
2023	20.9	--	1	6.7	58	2.8
Moderate						
2022	20.6	20.6	3	12.0	176	4.8
2023	20.6	--	1	6.7	99	4.9
Middle						
2022	22.7	20.5	6	24.0	1,131	31.1
2023	22.7	--	4	26.7	436	21.5
Upper						
2022	35.8	35.6	13	52.0	2,170	59.6
2023	35.8	--	7	46.7	1,219	60.2
Not Available						
2022	0.0	14.3	1	4.0	82	2.3
2023	0.0	--	2	13.3	215	10.6
Totals						
2022	100.0	100.0	25	100.0	3,640	100.0
2023	100.0	--	15	100.0	2,027	100.0
Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

The distribution of home mortgage loans reflects poor penetration among to individuals of different income levels, including low- and moderate-income borrowers. As reflected in the table above, the bank's lending to low-income borrowers is reasonable as it was somewhat consistent with aggregate performance in 2022 and 2023. However, the bank's lending performance to moderate-income borrowers reflects poor penetration as it significantly trails aggregate and the demographic benchmark. Overall, this performance is poor.

COMMUNITY DEVELOPMENT TEST

Unity Bank demonstrates adequate responsiveness to the community development needs of the AA primarily through community development loans, and to a lesser extent, through qualified investments and community development services.

Community Development Loans

Unity Bank originated 10 community development loans totaling \$1.9 million in this AA during the evaluation period. Notable community development loans in the AA include the following:

- In 2022, the bank originated a \$125,000 tax-exempt loan to construct a municipal building in a moderate-income census tract.
- In 2023, the bank originated two loans totaling \$135,096 to two small businesses. The purpose of the loans is to revitalize and stabilize two moderate-income census tracts within the AA.

Qualified Investments

Unity Bank made 6 qualified investments totaling \$680,950 in the AA. Notable qualified investments in the AA include the following:

- In 2017, the bank purchased a general obligation bond for water and sewer improvements. As of the examination date, the bond remains on the bank's books with a current book value of \$680,000. The city benefitted by the bond is located primarily within a moderate-income census tract.
- The bank made five donations totaling \$950 to local non-profit organizations during the evaluation period. The primary purpose of the donations were community services, economic development, or revitalize or stabilize.

Community Development Services

During the evaluation period, bank employees provided 10 instances of financial expertise or technical assistance to 7 different entities in the AA. Additionally, the bank operates one branch in a moderate-income census tract in this AA. Notable community development services in the AA include the following:

- In 2023, one employee taught financial literacy at a school where more than 50 percent of the student population is eligible to receive free and reduced-priced meals.
- One employee serves as a board member of an organization that promotes economic development for small businesses within the community.

MINNESOTA NORTH NON-MSA AA – Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINNESOTA NORTH NON- MSA AA

This AA includes all census tracts in Red Lake and Pennington Counties in Minnesota. In this Non-MSA AA, Unity Bank operates one branch in a middle-income census tract in Red Lake County that is designated as underserved and a loan and deposit production office in a Pennington County middle-income census tract.

Economic and Demographic Data

According to 2020 census data, the Minnesota North Non-MSA AA is comprised of six middle- and one upper-income census tract. The two census tracts in Red Lake County were designated by the FFIEC as remote, rural, and underserved for 2022 and 2023. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Assessment Area: Minnesota North Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	85.7	14.3	0.0
Population by Geography	17,927	0.0	0.0	88.2	11.8	0.0
Housing Units by Geography	8,527	0.0	0.0	90.2	9.8	0.0
Owner-Occupied Units by Geography	5,858	0.0	0.0	87.8	12.2	0.0
Occupied Rental Units by Geography	1,831	0.0	0.0	97.2	2.8	0.0
Vacant Units by Geography	838	0.0	0.0	91.6	8.4	0.0
Businesses by Geography	1,558	0.0	0.0	90.7	9.3	0.0
Farms by Geography	237	0.0	0.0	85.7	14.3	0.0
Family Distribution by Income Level	4,767	18.2	17.3	22.2	42.4	0.0
Household Distribution by Income Level	7,689	21.6	17.0	18.2	43.2	0.0
Median Family Income Non-MSAs MN		\$74,737	Median Housing Value			\$153,918
			Median Gross Rent			\$736
			Families Below Poverty Level			7.3%
Sources: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, service industries represent the largest portion of businesses at 30.6 percent; followed by non-classifiable establishments at 15.3 percent: agriculture, forestry, and fishing at 13.2 percent; and retail trade at 10.5 percent. In addition, 64.4 percent of AA businesses have four or fewer employees, and 88.5 percent operate from a single location.

The following table presents the low-, moderate-, middle-, and upper-income categories for the Minnesota Non-MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
MN NA Median Family Income (99999)				
2022 (\$83,600)	<\$41,800	\$41,800 to <\$66,880	\$66,880 to <\$100,320	≥\$100,320
2023 (\$90,400)	<\$45,200	\$45,200 to <\$72,320	\$72,320 to <\$108,480	≥\$108,480
Source: FFIEC				

Competition

There is a moderate level of competition for financial services in this two county AA. As of June 30, 2023, FDIC deposit market share data shows seven financial institutions operating nine offices in the AA. Of those institutions, Unity Bank ranked fifth with 5.6 percent of the deposit market share. The top institution accounted for 52.4 percent of the deposit market share.

Aggregate small business and small farm loan data from 2022 illustrates a modest level of competition in the AA. In 2022, 29 lenders reported 226 small business loan originations in the AA. In 2022, 10 lenders reported 58 small farm loan originations in the AA.

There is a moderate level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 60 lenders originated 248 home mortgage loans in the AA. Of those lenders, Unity Bank ranked sixth with 4.0 percent of the home mortgage market share.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MINNESOTA NORTH NON- MSA AA

LENDING TEST

Unity Bank's lending performance in the AA is consistent with the lending performance in the AAs within the state of Minnesota that examiners reviewed using full-scope examination procedures.

Geographic Distribution

The AA does not include any low- or moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, examiners did not evaluate this criterion.

Borrower Profile

The borrower profile is consistent with the institution's lending performance in the AAs that examiners reviewed using the full-scope examination procedures.

Small Business Loans

Distribution of 2023 Small Business Loans by Gross Annual Revenue Category
Assessment Area: Minnesota North Non-MSA

Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	81.5	16	88.9	1,278	83.1
>\$1,000,000	4.9	2	11.1	260	16.9
Revenue Not Available	13.6	0	0.0	0	0.0
Totals	100.0	18	100.0	1,538	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The institution's small business lending performance in this AA exceeds the performance of the AAs reviewed using full-scope procedures. Unity Bank's performance exceeds the demographic.

Small Farm Loans

The institution's small farm lending performance in this AA is consistent with the performance of the AAs reviewed using full-scope procedures. Performance exceeds one similarly situated bank in the AA.

Distribution of 2023 Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: Minnesota North Non-MSA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	99.2	16	84.2	1,725	65.1
>\$1,000,000	0.0	3	15.8	925	34.9
Revenue Not Available	0.8	0	0.0	0	0.0
Totals	100.0	19	100.0	2,650	100.0

Home Mortgage Loans

The institution's home mortgage lending performance is consistent with the performance of the AAs reviewed using full-scope procedures. Unity Bank did not make a home mortgage loan to a low-income borrower in 2022 or 2023, but lending performance to moderate-income borrowers significantly exceeded the aggregate and demographic benchmarks.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Minnesota North Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	18.2	11.0	0	0.0	0	0.0
2023	18.2	--	0	0.0	0	0.0
Moderate						
2022	17.3	28.5	6	60.0	383	25.4

2023	17.3	--	1	25.0	87	12.1
Middle						
2022	22.2	25.1	3	30.0	473	31.4
2023	22.2	--	2	50.0	516	71.9
Upper						
2022	42.4	16.2	1	10.0	650	43.2
2023	42.4	--	1	25.0	115	16.0
Not Available						
2022	0.0	19.2	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
Totals						
2022	100.0	100.0	10	100.0	1,506	100.0
2023	100.0	--	4	100.0	718	100.0
<i>Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

COMMUNITY DEVELOPMENT TEST

Unity Bank's community development performance in this AA is below the institution's community development performance in the AAs that were reviewed using full-scope examination procedures; however, it does not change the conclusion for the state of Minnesota.

Unity Bank made four donations totaling \$697 and provided one instance of financial expertise to an economic development corporation during the evaluation period in the AA. The bank did not originate any community development loans within the AA.

MINNEAPOLIS-SAINT PAUL MSA - NORTH EAST AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINNEAPOLIS-SAINT PAUL MSA - NORTH EAST AA

This AA includes all census tracts in Chisago, Isanti, and Mille Lacs Counties in Minnesota. Unity Bank has one branch in a middle-income census tract in Chisago County.

Economic and Demographic Data

According to 2020 U.S. Census data, the Minneapolis-Saint Paul MSA - North East AA is comprised of 10 moderate- and 19 middle-income census tracts. Of the 10 moderate-income census tracts in this AA, 6 are in Mille Lacs County. Mille Lacs County is the furthest county away from the one bank branch in the AA. Specifically, the county line is approximately 30 miles from the nearest bank branch. In the third quarter of 2023, FEMA issued a disaster declaration for flooding in several Minnesota Counties including Millie Lacs. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Assessment Area: Minneapolis-Saint Paul MSA - North East						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	0.0	34.5	65.5	0.0	0.0
Population by Geography	124,215	0.0	29.7	70.3	0.0	0.0
Housing Units by Geography	51,395	0.0	33.1	66.9	0.0	0.0
Owner-Occupied Units by Geography	38,408	0.0	27.4	72.6	0.0	0.0
Occupied Rental Units by Geography	7,666	0.0	50.1	49.9	0.0	0.0
Vacant Units by Geography	5,321	0.0	49.9	50.1	0.0	0.0
Businesses by Geography	10,980	0.0	29.6	70.4	0.0	0.0
Farms by Geography	727	0.0	23.0	77.0	0.0	0.0
Family Distribution by Income Level	32,203	23.2	23.0	26.5	27.4	0.0
Household Distribution by Income Level	46,074	25.6	17.4	22.3	34.7	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$103,977	Median Housing Value			\$218,147
			Median Gross Rent			\$921
			Families Below Poverty Level			5.0%
Sources: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, service industries represent the largest portion of businesses at 33.9 percent; followed by non-classifiable establishments at 15.4 percent; construction at 12.8 percent; and retail trade at 10.2 percent. Approximately 71.0 percent of AA businesses have four or fewer employees, and 93.7 percent operate from a single location.

Examiners used the FFIEC-estimated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the Minneapolis-Saint Paul-Bloomington MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Minneapolis-St. Paul-Bloomington, MN-WI MSA Median Family Income (33460)				
2022 (\$117,800)	<\$58,900	\$58,900 to <\$94,240	\$94,240 to <\$141,360	≥\$141,360
2023 (\$124,300)	<\$62,150	\$62,150 to <\$99,440	\$99,440 to <\$149,160	≥\$149,160
Source: FFIEC				

Competition

The AA is highly competitive in the market for financial services. As of June 30, 2023, FDIC deposit market share data shows 18 financial institutions operating 26 offices in the AA. Of those institutions, Unity Bank ranked 12th with 3.5 percent of the deposit market share. The top five institutions accounted for 49.7 percent of the deposit market share.

Aggregate small business loan data from 2022 illustrates a high level of competition, and aggregate small farm loan data illustrates a modest level of competition in the AA. In 2022, 64 lenders reported 2,153 small business loan originations in the AA. In 2022, 14 lenders reported 134 small farm loan originations in the AA.

There is a high level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 252 lenders originated 4,106 home mortgage loans in the AA. Of those lenders, Unity Bank ranked 113th with 0.1 percent of the home mortgage market share.

Credit and Community Development Needs and Opportunities

Considering information from bank management and demographic and economic data, examiners determined that the primary credit needs are small business and home mortgage lending, including start-up business financing and flexible loan programs. The significant percentages of businesses with GARs of \$1 million or less support the need for small business lending.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MINNEAPOLIS-SAINT PAUL MSA - NORTH EAST AA

LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test for this AA. Geographic Distribution and Borrower Profile performances primarily support this conclusion.

Geographic Distribution

The geographic distribution reflects excellent dispersion throughout the AA. Excellent performance in small business and small farm lending support this conclusion. Despite poor home mortgage

performance, the small business and small farm lending performance contribute more weight to overall conclusions. In the following analyses, examiners considered the location of the moderate-income census tracts in relation to the bank branch within the AA, which augmented performance.

Small Business Loans

Geographic Distribution of 2023 Small Business Loans					
Assessment Area: Minneapolis-Saint Paul MSA - North East					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	29.6	11	44.0	1,675	54.1
Middle	70.4	14	56.0	1,420	45.9
Totals	100.0	25	100.0	3,095	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The geographic distribution of small business loans is excellent. As reflected in the above table, Unity Bank's level of lending in the moderate-income tracts exceeds the demographic benchmark by 14.4 percentage points.

Small Farm Loans

Geographic Distribution of 2023 Small Farm Loans					
Assessment Area: Minneapolis-Saint Paul MSA - North East					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	23.0	14	60.9	1,368	62.5
Middle	77.0	9	39.1	822	37.5
Totals	100.0	23	100.0	2,190	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The geographic distribution of small farm loans is excellent. As reflected in the above table, Unity Bank's level of lending in the moderate-income tracts significantly exceeds the demographic benchmark by 37.9 percentage points.

Home Mortgage Loans

Unity Bank originated four home mortgage loans in 2022 and three home mortgage loans in 2023 within the AA. None of the 2022 and one of the 2023 home mortgage loans was originated in a moderate-income census tract. The low loan volume reflects poor performance. Specifically, Unity Bank only made 4.8 percent of the total home mortgages combined in 2022 and 2023 within this

AA. This level of lending trails the bank's operations and presence within the AA. Specifically, this AA accounts for 6.3 percent of the branches, 13.9 percent of total deposits, and 8.7 percent of the 2023 loans reviewed in the Lending Test. Further, as indicated previously by aggregate and demographic data, there is sufficient home mortgage lending opportunity in the AA.

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels.

Small Business Loans

Distribution of 2023 Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Minneapolis-Saint Paul MSA - North East					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	89.8	20	80.0	1,884	60.9
>\$1,000,000	3.1	5	20.0	1,211	39.1
Revenue Not Available	7.0	0	0.0	0	0.0
Totals	100.0	25	100.0	3,095	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Unity Bank's small business lending performance trails the demographic benchmark by 9.8 percentage points; however, this is reasonable. The demographic data represents the percentage of businesses of different sizes operating within the AA and does not represent the percentage of businesses that are seeking traditional bank financing. Many of the smallest businesses finance business needs with credit cards, limiting the demand for bank financing.

Further, this AA is highly competitive, with several financial institutions having a presence. Considering demographics, AA opportunities, and competition, performance is reasonable.

Small Farm Loans

Distribution of 2023 Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: Minneapolis-Saint Paul MSA - North East					
Gross Revenue Level	% of Farm	#	%	\$(000s)	%
<=\$1,000,000	98.1	22	95.7	1,765	80.6
>\$1,000,000	1.1	1	4.3	425	19.4
Revenue Not Available	0.8	0	0.0	0	0.0
Totals	100.0	23	100.0	2,190	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. The volume of lending to small farms is fairly consistent with the demographic benchmark.

Home Mortgage Loans

As noted previously, Unity Bank originated a low level of home mortgage loans in this AA. Of the four home mortgage loans originated in 2022, two originated to low-income borrowers, and one originated to a moderate-income borrower. Of the three home mortgage loans originated in 2023, the bank made one loan to a low-income borrower and one loan to a moderate-income borrower. Despite the low home mortgage volume, five of the seven home mortgage loans made in 2022 and 2023 within the AA are to low- or moderate-income borrowers.

COMMUNITY DEVELOPMENT TEST

Unity Bank demonstrates poor responsiveness to the community development needs of the AA.

Community Development Loans

Unity Bank did not originate any community development loans in this AA during the evaluation period.

Qualified Investments

Unity Bank made one donation totaling \$250 in the AA during the evaluation period.

Community Development Services

During the evaluation period, bank employees provided five instances of financial expertise or technical assistance to five different entities in the AA. Notable community development services in the AA include the following:

- In 2023, one employee offered financial literacy to students of a school in a moderate-income census tract.
- In 2022, an employee served as a representative for an economic development group that serves moderate-income geographies.

MINNEAPOLIS-SAINT PAUL MSA - HENNEPIN AA – Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINNEAPOLIS-SAINT PAUL MSA - HENNEPIN AA

This AA includes a portion of Hennepin County, which is relatively close to the Minneapolis-Saint Paul International Airport. Specifically, the AA includes 21 contiguous census tracts located in the south-central portion of Hennepin County. In this AA, the institution operates one full-service branch and another branch in a retirement village with reduced operating hours. Both locations are in upper-income census tracts. The bank has limited lending in this AA in general and no agricultural lending. Consequently, performance in the AA contributed nominally to the state and institutional rating as lending volume for the bank's primary credit products in the AA was limited.

Economic and Demographic Data

According to 2020 U.S. Census data, the Minneapolis-Saint Paul MSA - Hennepin AA is comprised of 21 census tracts including 1 moderate-, 10 middle-, and 10 upper-income census tracts. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Assessment Area: Minneapolis-Saint Paul MSA – Hennepin						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	4.8	47.6	47.6	0.0
Population by Geography	82,129	0.0	6.2	53.6	40.2	0.0
Housing Units by Geography	35,917	0.0	6.5	54.5	39.0	0.0
Owner-Occupied Units by Geography	22,521	0.0	1.3	52.0	46.6	0.0
Occupied Rental Units by Geography	11,671	0.0	15.4	60.5	24.1	0.0
Vacant Units by Geography	1,725	0.0	12.9	46.7	40.4	0.0
Businesses by Geography	17,325	0.0	4.1	43.5	52.5	0.0
Farms by Geography	187	0.0	2.1	42.2	55.6	0.0
Family Distribution by Income Level	21,366	14.9	16.5	22.2	46.4	0.0
Household Distribution by Income Level	34,192	17.3	16.5	19.0	47.2	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$103,977	Median Housing Value			\$345,860
			Median Gross Rent			\$1,396
			Families Below Poverty Level			3.1%
Sources: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, service industries represent the largest portion of businesses at 41.5 percent; followed by non-classifiable establishments at 18.2 percent; finance, insurance, and real estate at 17.1 percent; and retail trade at 7.1 percent. In addition, 62.5 percent of AA employers have four or fewer employees, and 89.8 percent operate from a single location.

Examiners used the FFIEC-estimated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the Minneapolis-Saint Paul-Bloomington MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Minneapolis-St. Paul-Bloomington, MN-WI MSA Median Family Income (33460)				
2022 (\$117,800)	<\$58,900	\$58,900 to <\$94,240	\$94,240 to <\$141,360	≥\$141,360
2023 (\$124,300)	<\$62,150	\$62,150 to <\$99,440	\$99,440 to <\$149,160	≥\$149,160
Source: FFIEC				

Competition

There is an extremely high level of competition for financial services in Hennepin County. As of June 30, 2023, FDIC deposit market share data shows 72 financial institutions operating 272 offices in Hennepin County. Of those institutions, Unity Bank ranked 62nd with less than 0.1 percent of the deposit market share. The top three institutions accounted for 73.2 percent of the deposit market share.

Aggregate small business loan data from 2022 illustrates a high level of competition in Hennepin County. In 2022, 136 lenders reported 33,713 small business loan originations in Hennepin County.

There is a high level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 207 lenders originated 1,998 home mortgage loans in the AA. Of those lenders, Unity Bank ranked 103rd with 0.1 percent of the home mortgage market share.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MINNEAPOLIS-SAINT PAUL MSA - HENNEPIN AA

LENDING TEST

Unity Bank's lending performance in this AA is below the lending performance in the AAs that examiners reviewed using full-scope examination procedures; however, it does not change the conclusion for state of Minnesota.

Geographic Distribution

The geographic distribution of small business and home mortgage loans is below the institution's lending performance in the AAs that examiners reviewed using full-scope examination procedures; however, it does not change the overall conclusion for this criterion.

Small Business Loans

The bank originated three small business loans in 2023 within the AA. None of the loans were originated in the moderate-income census tract.

Home Mortgage Loans

The bank originated two home mortgage loans in 2022 and no home mortgage loans in 2023 within the AA. None of the loans were originated in the moderate-income census tract.

Borrower Profile

The borrower profile of small business and home mortgage loans is below the institution's lending performance in the AAs that examiners reviewed using full-scope examination procedures; however, it does not change the overall conclusion for this criterion.

Small Business Loans

As noted previously, the bank originated three small business loans in 2023 within the AA. Two of the three were to businesses with GARs of \$1 million or less.

Home Mortgage Loans

As noted previously, the bank originated two home mortgage loans in 2022 and no home mortgage loans in 2023 within the AA. None of the loans were originated to low- or moderate-income borrowers.

COMMUNITY DEVELOPMENT TEST

Unity Bank's community development performance in this AA is below the institution's community development performance in the AAs that were reviewed using full-scope examination procedures; however, it does not change the conclusion for the state of Minnesota.

The bank did not originate any community development loans, make any qualified investments, or have any community development services within the AA.

GRAND FORKS MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GRAND FORKS MSA AA

This AA includes all census tracts in Polk County, which is part of the Grand Forks MSA. The institution operates one full-service branch in a middle-income census tract.

Economic and Demographic Data

According to 2020 census data, the Grand Forks MSA AA is comprised of nine middle- and one upper-income census tract. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Assessment Area: Grand Forks MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	0.0	90.0	10.0	0.0
Population by Geography	31,192	0.0	0.0	89.7	10.3	0.0
Housing Units by Geography	15,020	0.0	0.0	93.0	7.0	0.0
Owner-Occupied Units by Geography	9,021	0.0	0.0	88.8	11.2	0.0
Occupied Rental Units by Geography	3,598	0.0	0.0	98.6	1.4	0.0
Vacant Units by Geography	2,401	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	2,886	0.0	0.0	93.9	6.1	0.0
Farms by Geography	554	0.0	0.0	97.1	2.9	0.0
Family Distribution by Income Level	7,693	19.4	17.4	25.6	37.6	0.0
Household Distribution by Income Level	12,619	25.3	12.6	16.7	45.4	0.0
Median Family Income MSA - 24220 Grand Forks, ND-MN MSA		\$82,257	Median Housing Value			\$164,403
			Median Gross Rent			\$680
			Families Below Poverty Level			6.3%
Sources: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, service industries represent the largest portion of businesses and farms at 29.9 percent; followed by agriculture, forestry, and fishing at 16.1 percent; non-classifiable establishments at 15.3 percent; retail trade at 8.9 percent; and finance, insurance and real estate at 8.3 percent. In addition, 66.9 percent of AA employers have four or fewer employees, and 90.1 percent operate from a single location.

According to the 2022 USDA Census of Agriculture, slightly less than half of farm owners (49.1 percent) list something other than farming as their primary occupation, and slightly more than half of AA farms (50.2 percent) do not report interest expense.

Examiners used the FFIEC-estimated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the Grand Forks MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Grand Forks, ND-MN MSA Median Family Income (24220)				
2022 (\$92,800)	<\$46,400	\$46,400 to <\$74,240	\$74,240 to <\$111,360	≥\$111,360
2023 (\$94,200)	<\$47,100	\$47,100 to <\$75,360	\$75,360 to <\$113,040	≥\$113,040
Source: FFIEC				

Competition

There is a moderate level of competition for financial services in this one county AA. As of June 30, 2023, FDIC deposit market share data shows 10 financial institutions operating 14 offices in the AA. Of those institutions, Unity Bank ranked 10th with 1.8 percent of the deposit market share. The top three institutions accounted for 61.8 percent of the deposit market share.

Aggregate small business and small farm loan data from 2022 illustrates a moderate level of competition in the AA. In 2022, 39 lenders reported 597 small business loan originations in the AA. In 2022, 15 lenders reported 325 small farm loan originations in the AA.

There is a moderate level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 80 lenders originated 588 home mortgage loans in the AA. Of those lenders, Unity Bank ranked 13th with 1.9 percent of the home mortgage market share.

Credit and Community Development Needs and Opportunities

Considering information from bank management and demographic and economic data, examiners determined that there are credit needs for small business, small farm, and home mortgage lending, including start-up business financing and flexible loan programs. The significant percentages of businesses and farms with GARs of \$1 million or less support the need for small business and small farm lending.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GRAND FORKS MSA AA LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test for this AA. Performance under the Borrower Profile criterion primarily supports this conclusion.

Geographic Distribution

The AA does not include any low- or moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, examiners did not evaluate this criterion.

Borrower Profile

The borrower profile reflects reasonable dispersion throughout the AA. This conclusion is supported by reasonable dispersion of small business and home mortgage loans. Despite poor small farm performance, the small business lending performance contributes more weight to overall conclusions.

Small Business Loans

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Grand Forks MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	83.5	15	83.3	1,852	81.6
>\$1,000,000	4.2	3	16.7	417	18.4
Revenue Not Available	12.3	0	0.0	0	0.0
Totals	100.0	18	100.0	2,269	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. Unity Bank's performance slightly trails the demographic benchmark by 0.2 percentage points.

Small Farm Loans

Unity Bank originated two small farm loans in 2023 within the AA. While both loans were to farms with GARs of \$1 million or less, the low loan volume reflects poor penetration. Specifically, Unity Bank only made 0.8 percent of all 2023 small farm loans within this AA. This level of lending is not consistent with the bank's operations and presence within the AA. Specifically, this AA accounts for 6.3 percent of the branches, 3.2 percent of total deposits, and 4.7 percent of the 2023 loans reviewed in the Lending Test. Further, as indicated previously by aggregate and demographic data, there is sufficient small farm lending opportunity in the AA.

Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Grand Forks MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	19.4	12.9	1	9.1	48	2.8
2023	19.4	--	0	0.0	0	0.0
Moderate						
2022	17.4	23.0	3	27.3	403	24.0
2023	17.4	--	3	50.0	223	41.7
Middle						

2022	25.6	21.3	2	18.2	285	17.0
2023	25.6	--	1	16.7	50	9.4
Upper						
2022	37.6	26.8	3	27.3	726	43.3
2023	37.6	--	1	16.7	161	30.2
Not Available						
2022	0.0	16.0	2	18.2	216	12.9
2023	0.0	--	1	16.7	100	18.7
Totals						
2022	100.0	100.0	11	100.0	1,676	100.0
2023	100.0	--	6	100.0	534	100.0
<i>Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. As reflected in the previous table, the bank's lending to low-income borrowers in 2022 trails aggregate data by 3.8 percentage points. This performance reasonable. Unity Bank only made six home mortgage loans in 2023 within the AA, and none of them were to low-income borrowers.

Unity Bank's performance of lending to moderate-income borrowers exceeds aggregate by 4.3 percentage points in 2022. Unity Bank made three loans to moderate-income borrowers in 2023 which represents 50.0 percent of the home mortgage lending within the AA. This percentage significantly exceeds the demographic benchmark; however, it is largely attributed to the bank making a lower number of home mortgage loans in the AA in 2023. Overall, the bank's lending performance to low- and moderate-income borrowers is reasonable.

COMMUNITY DEVELOPMENT TEST

Unity Bank demonstrates poor responsiveness to the community development needs of the AA.

Community Development Loans

Unity Bank did not originate any community development loans in the AA during the evaluation period.

Qualified Investments

Unity Bank made one donation totaling \$100 in the AA during the evaluation period.

Community Development Services

Unity Bank did not have any community development services in the AA during the evaluation period.

STATE OF WISCONSIN – Full Scope Review

CRA rating for the state of Wisconsin: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF WISCONSIN

Unity Bank has two AAs in the State of Wisconsin, which have not changed since the prior evaluation. Examiners gave more weight to the Eau Claire MSA AA due to greater volumes of lending and deposit activity when compared to the Wisconsin Non-MSA AA. Unity Bank has four offices in Wisconsin all of which are in middle-income census tracts.

Data sources used in this section are as follows: FFIEC Median Family Income data, 2020 U.S. Census data, 2023 D&B data, loan information reported under the HMDA, 2022 USDA Census of Agriculture data, and other readily available public information.

SCOPE OF EVALUATION – STATE OF WISCONSIN

Examiners reviewed small business, small farm, and home mortgage lending in the two AAs. Both AAs received a full-scope review. Refer to the overall Scope of Evaluation Section for information about the weighting of the products.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE STATE OF WISCONSIN LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test in the state of Wisconsin. The Geographic Distribution and Borrower Profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Wisconsin AAs. The bank has a reasonable lending performance in making small business, small farm, and home mortgage loans in moderate-income census tracts in the Eau Claire AA. The Wisconsin Non-MSA AA does not have any low- or moderate-income census tracts. Therefore, the Geographic Distribution criterion was not evaluated for this AA.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels. The performance was consistent among the AAs.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance demonstrates adequate responsiveness to community development needs in its AAs through community development loans, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's AAs.

Community Development Loans

Unity Bank originated 11 community development loans totaling \$6.5 million in the Wisconsin AAs. The following table shows the breakdown of community development loans by year.

Community Development Lending - Wisconsin										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (partial)	0	0	4	2,665	1	115	0	0	5	2,780
2023	1	77	5	3,688	0	0	0	0	6	3,765
YTD 2024	0	0	0	0	0	0	0	0	0	0
Total	1	77	9	6,353	1	115	0	0	11	6,545
Source: Bank Data										

Qualified Investments

Unity Bank had no qualified investments in Wisconsin during the evaluation period.

Community Development Services

Unity Bank had one community development service with the primary purpose of community services in the Wisconsin Non-MSA AA and one community development service with the primary purpose of affordable housing in the statewide area during the evaluation period.

EAU CLAIRE MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EAU CLAIRE MSA AA

The Eau Claire MSA AA includes all census tracts in Eau Claire County. All three offices in the AA are in middle-income census tracts.

Economic and Demographic Data

According to 2020 census data, the Eau Claire MSA AA is comprised of 3 moderate-, 13 middle-, and 6 upper-income census tracts.

Unity Bank's three branches are in rural geographies in the two easternmost census tracts in Eau Claire County. Unity Bank has three of the five total financial institution branches located in these two easternmost census tracts. Notably, the three moderate-income census tracts are in the City of Eau Claire, which are between 7 and 26 miles from the bank's branches. Further, there are 19

competing financial institutions, including credit unions, with 45 branches closer to the moderate-income census tracts than Unity Bank. This includes 12 competing financial institutions with 13 branches within the moderate-income census tracts. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Assessment Area: Eau Claire MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	13.6	59.1	27.3	0.0
Population by Geography	105,710	0.0	14.3	56.8	28.9	0.0
Housing Units by Geography	44,419	0.0	16.1	57.1	26.8	0.0
Owner-Occupied Units by Geography	26,688	0.0	12.0	64.2	23.8	0.0
Occupied Rental Units by Geography	14,914	0.0	23.6	45.3	31.1	0.0
Vacant Units by Geography	2,817	0.0	14.8	53.1	32.1	0.0
Businesses by Geography	9,884	0.0	19.5	57.0	23.5	0.0
Farms by Geography	403	0.0	6.7	66.5	26.8	0.0
Family Distribution by Income Level	23,872	17.5	17.7	24.9	39.9	0.0
Household Distribution by Income Level	41,602	23.1	16.5	18.9	41.5	0.0
Median Family Income MSA - 20740 Eau Claire, WI MSA		\$79,795	Median Housing Value			\$183,054
			Median Gross Rent			\$833
			Families Below Poverty Level			5.0%
Sources: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, service industries represent the largest portion of businesses at 34.8 percent; followed by non-classifiable establishments at 22.3 percent, retail trade at 11.6 percent; finance, insurance, and real estate at 11.2 percent. In addition, 59.4 percent of AA employers have four or fewer employees, and 89.6 percent operate from a single location.

According to the 2022 USDA Census of Agriculture, 57.2 percent of farm owners do not report farming as their primary occupation, and 65.0 percent of farms report no interest expense.

Examiners used the FFIEC-estimated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the Eau Claire MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Eau Claire, WI MSA Median Family Income (20740)				
2022 (\$90,000)	<\$45,000	\$45,000 to <\$72,000	\$72,000 to <\$108,000	≥\$108,000
2023 (\$91,300)	<\$45,650	\$45,650 to <\$73,040	\$73,040 to <\$109,560	≥\$109,560
Source: FFIEC				

Competition

There is a moderate level of competition for financial services in this one county AA. As of June 30, 2023, FDIC deposit market share data shows 16 financial institutions operating 27 offices in the AA. Of those institutions, Unity Bank ranked sixth with 7.4 percent of the deposit market share. The top five institutions accounted for 68.8 percent of the deposit market share.

Aggregate small business loan data from 2022 illustrates a moderate level of competition, and the aggregate small farm loan data from 2022 illustrates a modest level of competition. In 2022, 58 lenders reported 1,678 small business loan originations in the AA. In 2022, 12 lenders reported 56 small farm loan originations in the AA.

There is a moderate level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 198 lenders originated 3,045 home mortgage loans in the AA. Of those lenders, Unity Bank ranked 34th with 0.4 percent of the home mortgage market share.

Credit and Community Development Needs and Opportunities

Considering information from bank management and demographic and economic data, examiners determined that the primary credit needs are for small business and home mortgage loans in the AA. Primary community development needs include economic development and affordable housing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE EAU CLAIRE MSA AA LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test for this AA. Reasonable performance under Geographic Distribution and Borrower Profile supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable penetration throughout the AA. The bank's reasonable small business, small farm, and home mortgage lending performance supports this conclusion. In the following analyses, examiners considered the location of the moderate-income census tracts in relation to the bank branches within the AA, which augmented performance.

Small Business Loans

Geographic Distribution of 2023 Small Business Loans					
Assessment Area: Eau Claire MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	19.5	2	4.3	189	6.1
Middle	57.0	45	95.7	2,888	93.9
Upper	23.5	0	0.0	0	0.0
Totals	100.0	47	100.0	3,077	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Small Farm Loans

Geographic Distribution of 2023 Small Farm Loans					
Assessment Area: Eau Claire MSA					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	6.7	0	0.0	0	0.0
Middle	66.5	65	98.5	5,834	92.8
Upper	26.8	1	1.5	450	7.2
Totals	100.0	66	100.0	6,284	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The geographic distribution of small farm loans shows a lack of activity in moderate-income census tracts. Although Unity Bank does not report small farm lending data, 2022 aggregate data shows that 0.0 percent of AA small farm loans were originated in moderate-income tracts. While not all lenders report farm loan data, this demonstrates the limited demand for small farm loans in moderate-income census tracts.

Based on demographics, AA opportunities, competition, and locations of moderate-income census tracts relative to the bank's branches, Unity Bank's dispersion of small farm loans is reasonable.

Home Mortgage Loans

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Eau Claire MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate						
2022	12.0	15.3	1	7.7	120	5.1
2023	12.0	--	0	0.0	0	0.0
Middle						
2022	64.2	61.1	10	76.9	1,824	78.2
2023	64.2	--	3	100.0	98	100.0
Upper						
2022	23.8	23.6	2	15.4	388	16.6
2023	23.8	--	0	0.0	0	0.0
Not Available						
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
Totals						
2022	100.0	100.0	13	100.0	2,332	100.0
2023	100.0	--	3	100.0	98	100.0
Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

The geographic distribution of home mortgage loans reflects reasonable dispersion in this AA. Unity Bank made one home mortgage loan in a moderate-income census tract in 2022. The bank did not make any home mortgage loans in the moderate-income census tracts in 2023.

As noted previously, all three moderate-income census tracts are in the City of Eau Claire, and Unity Bank is located a notable distance away from those census tracts. Additionally, there is significant competition among lenders in the AA.

Unity Bank only made three home mortgage loans outside of the two tracts of the AA that they operate combined in 2022 and 2023. Of the three home mortgage loans made outside of those easternmost census tracts in the AA, one was within a moderate-income census tract.

Based on demographics, AA opportunities, competition, and locations of moderate-income census tracts relative to the bank's branches, Unity Bank's dispersion of home mortgage loans is reasonable.

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels in the AA. The bank's reasonable performance of small business, small farm, and home mortgage lending supports this conclusion.

Small Business Loans

Distribution of 2023 Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Eau Claire MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	86.4	38	80.9	2,758	89.6
>\$1,000,000	3.4	9	19.1	319	10.4
Revenue Not Available	10.1	0	0.0	0	0.0
Totals	100.0	47	100.0	3,077	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. The volume of lending to small businesses slightly trails the demographic benchmark by 5.5 percentage points.

Small Farm Loans

Distribution of 2023 Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: Eau Claire MSA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	97.5	62	93.9	5,120	81.5

>\$1,000,000	1.7	4	6.1	1,164	18.5
Revenue Not Available	0.7	0	0.0	0	0.0
Totals	100.0	66	100.0	6,284	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. The volume of lending to small farms slightly trails the demographic benchmark by 3.6 percentage points.

Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Eau Claire MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	17.5	9.9	3	23.1	253	10.8
2023	17.5	--	1	33.3	30	30.6
Moderate						
2022	17.7	23.3	1	7.7	200	8.6
2023	17.7	--	1	33.3	43	43.9
Middle						
2022	24.9	24.8	1	7.7	142	6.1
2023	24.9	--	0	0.0	0	0.0
Upper						
2022	39.9	29.3	4	30.8	1,064	45.6
2023	39.9	--	1	33.3	25	25.5
Not Available						
2022	0.0	12.6	4	30.8	673	28.9
2023	0.0	--	0	0.0	0	0.0
Totals						
2022	100.0	100.0	13	100.0	2,332	100.0
2023	100.0	--	3	100.0	98	100.0
<i>Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. As reflected in the above table, the bank's lending to low-income borrowers in 2022 greatly exceeds aggregate data. The bank's lending to low-income borrowers in 2023 greatly exceeds the demographic benchmark; however, the high percentage is attributed to only making three total home mortgage loans in the AA that year. Unity Bank only made one home mortgage loan to moderate-income borrowers in 2022 which, by percentage, significantly trails the demographic and aggregate benchmarks. The bank's lending to moderate-income borrowers in 2023 greatly exceeds the demographic benchmark, but it is attributed to low total volume of home mortgage loans in the AA that year. Overall, this performance is reasonable.

COMMUNITY DEVELOPMENT TEST

Unity Bank demonstrates adequate responsiveness to the community development needs of the AA primarily through community development loans.

Community Development Loans

Unity Bank originated four community development loans totaling \$4.2 million in the AA during the evaluation period. Notable community development loans in the AA include the following:

- In 2022, the bank originated a \$1.9 million loan for operation expenditures of a school district that more than 50 percent of the student population is eligible to receive free and reduced-priced meals.
- In 2023, the bank renewed a \$77,000 loan for improvements to a facility with six rental housing units that all have rents below U.S. Department of Housing and Urban Development Fair Market Rents for the county.

Qualified Investments

Unity Bank had no qualified investments in the AA during the evaluation period.

Community Development Services

Unity Bank had no community development services in the AA during the evaluation period.

WISCONSIN NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WISCONSIN NON-MSA AA

This AA includes Clark and Jackson Counties in Wisconsin. The institution operates one full- service branch in a middle-income census tract in Clark County.

Economic and Demographic Data

According to 2020 census data, the Wisconsin Non-MSA AA is comprised of 13 middle-income census tracts. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Wisconsin Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	0.0	100.0	0.0	0.0
Population by Geography	55,804	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	25,179	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	16,391	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	4,769	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	4,019	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	4,174	0.0	0.0	100.0	0.0	0.0
Farms by Geography	611	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	13,876	20.6	20.6	23.6	35.2	0.0
Household Distribution by Income Level	21,160	23.4	17.9	20.4	38.2	0.0
Median Family Income Non-MSAs - WI		\$71,740	Median Housing Value			\$134,964
			Median Gross Rent			\$686
			Families Below Poverty Level			7.8%
Sources: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, service industries represent the largest portion of businesses at 25.3 percent; followed by non-classifiable establishments at 19.6 percent; agriculture, forestry, and fishing at 12.8 percent; and retail trade at 10.2 percent. In addition, 64.1 percent of AA employers have four or fewer employees, and 91.2 percent operate from a single location.

Examiners used the FFIEC-estimated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the Wisconsin Non-MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%

WI NA Median Family Income (99999)				
2022 (\$81,500)	<\$40,750	\$40,750 to <\$65,200	\$65,200 to <\$97,800	≥\$97,800
2023 (\$86,000)	<\$43,000	\$43,000 to <\$68,800	\$68,800 to <\$103,200	≥\$103,200
Source: FFIEC				

Competition

There is a moderate level of competition for financial services in this two county AA. As of June 30, 2023, FDIC deposit market share data shows 10 financial institutions operating 19 offices in the AA. Of those institutions, Unity Bank ranked 8th with 4.8 percent of the deposit market share. The top two institutions accounted for 46.2 percent of the deposit market share.

Aggregate small business loan data from 2022 illustrates a moderate level of competition, and the aggregate small farm loan data from 2022 illustrates a modest level of competition. In 2022, 47 lenders reported 654 small business loan originations in the AA. In 2022, 16 lenders reported 170 small farm loan originations in the AA.

There is a moderate level of competition for home mortgage loans in the AA. Based on 2022 HMDA aggregate data, 134 lenders originated 1,232 home mortgage loans in the AA. Of those lenders, Unity Bank ranked 26th with 0.7 percent of the home mortgage market share.

Credit and Community Development Needs and Opportunities

According to information from the Wisconsin Department of Revenue, there are 17 active tax increment financing districts in 8 separate communities in the AA. Financing businesses in these areas are eligible for community development credit to the extent that the projects benefit low- and moderate-income individuals or create permanent jobs. Broadband distribution mapping data from the Wisconsin Public Service Commission also notes that a majority of Clark and Jackson County populations do not have broadband internet access options, which is a critical infrastructural need for business expansion. Consequently, examiners determined that financing broadband distribution is another community development need for the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WISCONSIN NON-MSA AA LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test for this AA. Reasonable performance under Borrower Profile supports this conclusion.

Geographic Distribution

The AA does not include any low- and moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, examiners did not evaluate this criterion.

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels in the AA. The bank's excellent

performance of small business and reasonable performance of small farm and home mortgage lending performance supports this conclusion.

Small Business Loans

Distribution of 2023 Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Wisconsin Non-MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	85.1	33	97.1	2,120	98.3
>\$1,000,000	3.8	1	2.9	37	1.7
Revenue Not Available	11.1	0	0.0	0	0.0
Totals	100.0	34	100.0	2,157	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of small business loans reflects excellent penetration among businesses of different sizes. The volume of lending to small businesses exceeds the demographic benchmark by 12.0 percentage points.

Small Farm Loans

Distribution of 2023 Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: Wisconsin Non-MSA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	96.9	37	100.0	2,137	100.0
>\$1,000,000	2.6	0	0.0	0	0.0
Revenue Not Available	0.5	0	0.0	0	0.0
Totals	100.0	37	100.0	2,137	100.0
Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. The volume of lending to small farms exceeds the demographic benchmark by 3.1 percentage points.

Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Wisconsin Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						

2022	20.6	13.3	2	25.0	90	18.7
2023	20.6	--	2	40.0	215	37.2
Moderate						
2022	20.6	28.2	2	25.0	205	42.6
2023	20.6	--	2	40.0	220	38.1
Middle						
2022	23.6	21.8	0	0.0	0	0.0
2023	23.6	--	1	20.0	143	24.7
Upper						
2022	35.2	25.6	4	50.0	186	38.7
2023	35.2	--	0	0.0	0	0.0
Not Available						
2022	0.0	11.1	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
Totals						
2022	100.0	100.0	8	100.0	481	100.0
2023	100.0	--	5	100.0	578	100.0
Sources: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. As reflected in the above table, the bank's lending to low-income borrowers consisted of two loans in 2022 and two loans in 2023. Similarly, the bank's lending to moderate-income borrowers also consisted of two loans in 2022 and two loans in 2023. Performance exceeds the benchmarks; however, these higher percentages are largely attributed to the bank making a lower number of home mortgage loans in the AA. Overall, the bank's lending performance to low- and moderate-income borrowers is reasonable.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance demonstrates adequate responsiveness to community development needs in this AA through community development loans.

Community Development Loans

Unity Bank originated seven community development loans totaling \$2.4 million in the AA during the evaluation period. All seven loans were to an entity that provides non-emergency, specialized transportation to elderly and disabled individuals in the AA. This service primarily serves low- and moderate-income individuals in the AA.

Qualified Investments

Unity Bank had no qualified investments in the AA during the evaluation period.

Community Development Services

Unity Bank had one community development service with the primary purpose of community services in the AA during the evaluation period.

STATE OF MONTANA – Full Scope Review

CRA rating for the state of Montana: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF MONTANA

Unity Bank has one AA in the State of Montana, the Montana Non-MSA AA. This AA includes Lake County and has not changed since the previous evaluation. Unity Bank operates one branch in Montana, which is in Polson in a middle-income census tract.

The AA has several unique features. According to 2020 U.S. Census data, approximately 9.9 percent of the landmass is water and 67.7 percent of the county's landmass is within the Flathead Indian Reservation. Tribal land-based lending requires coordination with the Bureau of Indian Affairs to obtain sovereign consent. The bank does not currently operate a HUD Section 184 program.

Data sources used in this section are as follows: FFIEC Median Family Income data, 2020 U.S. Census data, 2023 D&B data, loan information reported under the HMDA, 2022 USDA Census of Agriculture data, and other readily available public information.

Economic and Demographic Data

According to 2020 census data, the Montana Non-MSA AA is comprised of two moderate-, seven middle-, and one upper-income census tract. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Assessment Area: Montana Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	20.0	70.0	10.0	0.0
Population by Geography	31,134	0.0	29.9	64.4	5.6	0.0
Housing Units by Geography	16,917	0.0	21.1	69.5	9.5	0.0
Owner-Occupied Units by Geography	8,590	0.0	23.3	68.6	8.0	0.0
Occupied Rental Units by Geography	3,279	0.0	33.8	63.9	2.3	0.0
Vacant Units by Geography	5,048	0.0	9.0	74.5	16.6	0.0
Businesses by Geography	4,832	0.0	23.5	69.1	7.4	0.0
Farms by Geography	412	0.0	34.2	58.5	7.3	0.0
Family Distribution by Income Level	8,090	24.8	19.5	21.1	34.5	0.0
Household Distribution by Income Level	11,869	27.0	16.1	18.6	38.3	0.0

Median Family Income Non-MSAs - MT	\$70,967	Median Housing Value	\$283,556
		Median Gross Rent	\$738
		Families Below Poverty Level	11.2%
Sources: 2020 U.S. Census and 2023 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.			

According to 2023 D&B data, service industries represent the largest portion of businesses at 31.6 percent; followed by non-classifiable establishments at 23.0 percent; retail trade at 7.8 percent; and construction at 9.5 percent. In addition, 66.7 percent of AA employers have four or fewer employees, and 95.2 percent operate from a single location.

Competition

There is a modest level of competition for financial services in this AA. As of June 30, 2023, FDIC deposit market share data shows 5 financial institutions operating 14 offices in the AA. Of those institutions, Unity Bank ranked 5th with 3.0 percent of the deposit market share. The top institution accounts for 43.8 percent of the deposit market share.

Aggregate small business loan data from 2022 illustrates a moderate level of competition. In 2022, 48 lenders reported 833 small business loan originations in the AA.

Credit and Community Development Needs and Opportunities

According to data from the Montana Public Service Commission there are large segments of Lake County that are not served by broadband. High-speed internet service continues to be a critical need for expanding businesses. Examiners identified financing for critical infrastructure, such as broadband expansion, to be a community development need along with small business lending.

SCOPE OF EVALUATION – STATE OF MONTANA

Examiners conducted a full-scope review of the sole AA in this rated area. Refer to the overall Scope of Evaluation Section for information about the review procedures used and the weighting of the products. Examiners analyzed lending performance in relation to bank resources, market presence, and lending opportunities.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE STATE OF MONTANA LENDING TEST

Unity Bank demonstrated satisfactory performance under the Lending Test. The bank's performance under the Geographic Distribution and Borrower Profile criteria for small business lending supports this conclusion.

Geographic Distribution

The geographic distribution of small business loans reflects reasonable dispersion throughout the

AA. The table shows the bank's percentage by number of small business loans originated in moderate-income tracts slightly trails the demographic benchmark by 1.3 percentage points in 2023.

Geographic Distribution of 2023 Small Business Loans					
Assessment Area: Montana Non-MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	23.5	2	22.2	523	42.0
Middle	69.1	7	77.8	721	58.0
Upper	7.4	0	0.0	0	0.0
Totals	100.0	9	100.0	1,244	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Borrower Profile

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. The volume of lending to small businesses exceeds the demographic benchmark by 7.3 percentage points in 2023.

Distribution of 2023 Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Montana Non-MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	92.7	9	100.0	1,244	100.0
>\$1,000,000	1.9	0	0.0	0	0.0
Revenue Not Available	5.4	0	0.0	0	0.0
Totals	100.0	9	100.0	1,244	100.0
<i>Sources: 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

COMMUNITY DEVELOPMENT TEST

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

Unity Bank has limited market presence in Montana. As of June 30, 2023, Unity Bank had \$20.7 million in deposits or 4.0 percent of its total deposits from its sole Montana office. Additionally, only 11 of the 548 or 2.0 percent of the 2023 small business, small farm, and home mortgage loans reviewed in the Lending Test were in the Montana Non-MSA AA.

Unity Bank's community development performance is adequate, relative to their market presence, capacity, and the community development needs and opportunities that exist within the state.

Community Development Loans

Unity Bank originated one community development loan totaling \$150,000 in the AA during the evaluation period. This loan is to an entity that specializes in wildland fire support including in FEMA designated disaster areas. This performance represents 4.5 percent, by number, and 1.8 percent, by dollar, of all community development lending that occurred in a Unity Bank AA during the evaluation period.

Qualified Investments

Unity Bank has one prior period revenue bond with a current book value of \$23,248. The bond was purchased in 2020 and benefits an urban renewal tax increment financing district. Unity Bank made no new qualified investments in the AA during the evaluation period. This performance represents 3.3 percent, by dollar, of all qualified investments that occurred in a Unity Bank AA during the evaluation period.

Community Development Services

Unity Bank had no community development services in the AA during the evaluation period.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

1. The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2. The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
3. The geographic distribution of the bank's loans;
4. The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
5. The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

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

SUMMARY OF RATINGS

Rated Area	Lending Test Rating	Community Development Test Rating	Overall Rating for Rated Area
State of Minnesota	Satisfactory	Satisfactory	Satisfactory
State of Wisconsin	Satisfactory	Satisfactory	Satisfactory
State of Montana	Satisfactory	Satisfactory	Satisfactory

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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

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

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

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have

been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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

1. An unemployment rate of at least 1.5 times the national average;
2. A poverty rate of 20 percent or more; or

3. A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

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

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

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

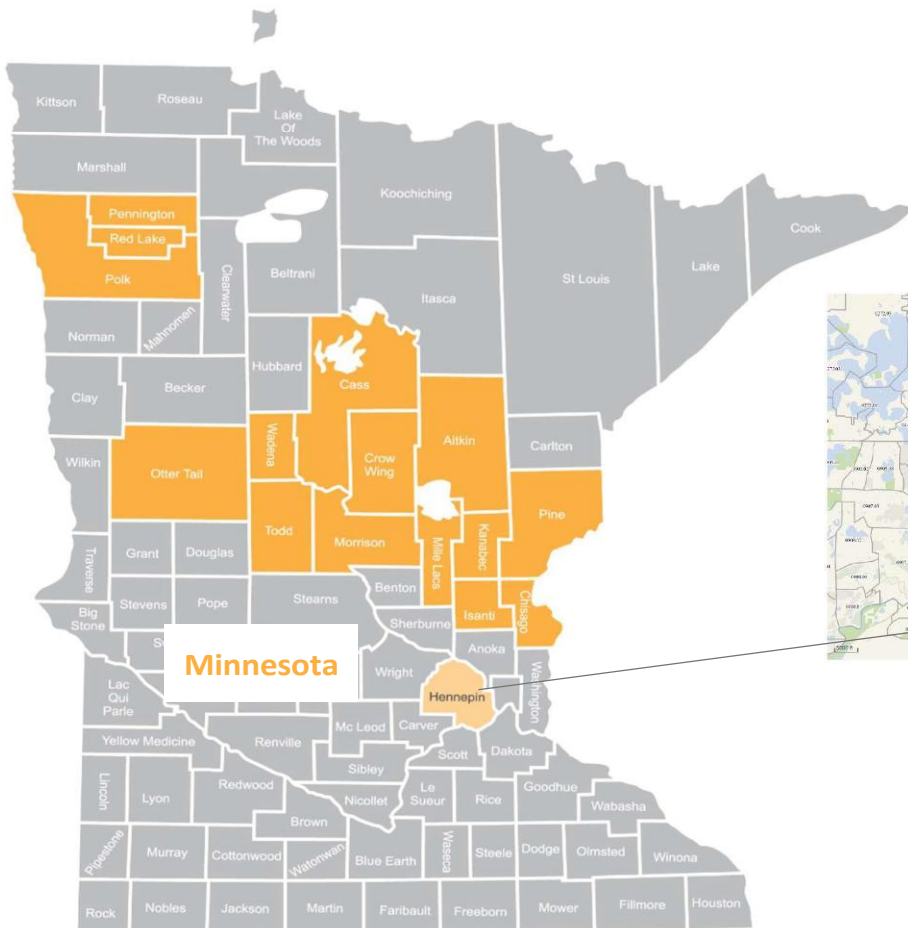
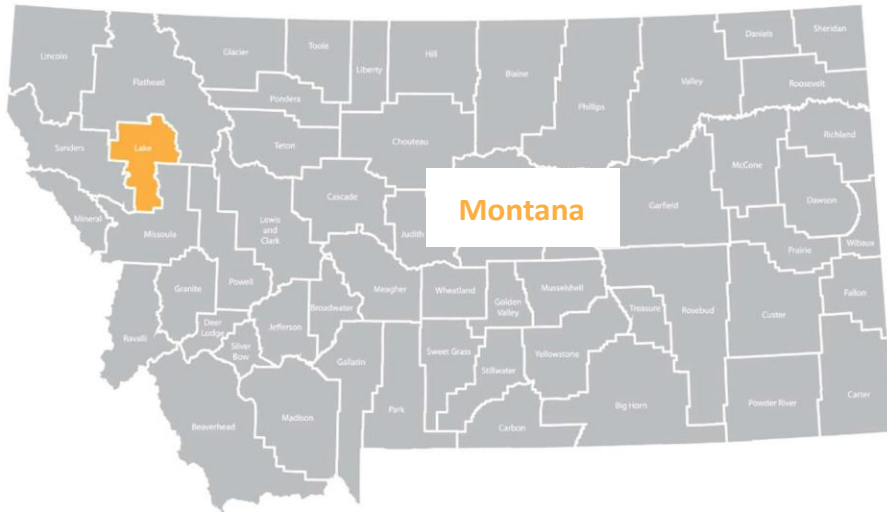
Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs

(except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

ASSESSMENT AREA



UNITY BANK LOCATIONS

Location	Address	Phone	Fax	Lobby Hours	Walk-Up Hours	Drive-Up Hours
Augusta (Main)	207 W Lincoln St Augusta, WI 54722	715-286-2223	715-861-8066	Mon – Fri 9:00 – 4:30	Mon – Thurs 8:00 – 5:00 Fri 8:00 – 5:30	Mon – Thurs 8:00 – 5:00 Fri 8:00 – 5:30 Sat 8:30 – 12:00
Clarissa	112 West Main St Clarissa, MN 56440	218-756-2445	320-547-8008	Mon – Fri 9:00 – 3:00	NA	Mon – Fri 8:00 – 4:00
Crosby	15 East Main St Crosby, MN 56441	218-546-5153	218-963-5355	Mon – Fri 8:30 – 4:00	NA	Mon – Fri 8:00 – 5:00 Sat: 9:00 – 12:00
Edina	7101 Washington Avenue Edina, MN 55439	952-465-3000	952-245-1266	Mon – Fri 9:00 – 4:00 By Appointment	NA	Mon – Fri 8:00 – 4:00
Fairchild	111 N Front Street Fairchild, WI 54741	Branch closed effective 12/19/2025				
Fall Creek	103 E Lincoln Ave Fall Creek, WI 54742	715-877-2311	715-670-3068	Mon – Fri 8:30 – 4:30	NA	Mon – Fri 8:00 – 5:00
Friendship Village	8100 Highwood Dr Bloomington, MN 55438	Branch closed effective 12/19/2025				
Genola/ Pierz	26171 Hwy 27 Pierz, MN 56364	320-468-0366	218-963-5420	Mon – Thurs 8:30 – 4:00 Fri 8:30 – 5:00	Mon-Thurs 8:30 – 4:00 Fri 8:30 – 5:00	Mon – Fri 7:30 – 5:00 Sat 9:00 – 12:00
Mentor	47 County Rd 113 N Mentor, MN 56736	218-637-2971	218-277-5005	Mon-Fri 9:00 – 4:30	NA	Mon – Fri 9:00 – 4:30
Motley	1217 Highway 10 S Motley, MN 56466	218-352-6962	218-352-6964	Mon-Fri 9:00 – 4:00	NA	Mon – Fri 8:00 – 5:00
Neillsville	500 West Street Neillsville, WI 54456	715-743-3144	715-502-3340	Mon – Thurs 8:30 – 4:30 Fri 8:30 – 4:30	Sat 9:00 - 12:00	Mon - Fri 8:00 - 5:00 Sat 9:00 - 12:00
Polson	104 Ridgewater Dr Polson, MT 59860	406-883-4358	406-883-3880	Mon-Fri 8:00 – 5:00 MT	NA	Mon – Fri 8:00 - 5:00 MT Sat 9800 – 11 :00
Rush City	1180 West 4 th St Rush City, MN 55069	320-358-3600	320-209-7395	Mon-Fri 9:00 - 4:00	NA	Mon – Fri 8:00 – 5:00 Sat 9:00 – 12:00
Red Lake Falls	210 Main Ave S Red Lake Falls, MN 56750	218-253-2143	218-683-6022	Mon-Fri 8:30 – 4:30	NA	Mon - Wed 8:00 – 4:30 Thurs – Fri 8:00 – 5:00 Sat 9:00 to 12:00
Staples	602 NE 4 th St Staples, MN 56479	218-894-2084	218-319-7047	Mon – Fri 9:00 – 4:00	NA	Mon – Fri 8:00 – 5:00
Thief River Falls LPO/DPO	201 ½ 3 rd St W Thief River Falls, MN 56701	Branch closed as of 12/19/2025				

Home Mortgage Disclosure Act Institution Register Summary for 2022

Nationwide

Institution: 549300K1K5K5L0W6QR97

		Total Lars	Total Amount (\$000's)	CONV	FHA	VA	FSA	Site Built	Manu- factured	1-4 units	5+ units	Home Purchase	Home Improvemen	Refinancing	Cash-out Refinancing	Other Purpose	Purpose N/A
MSA/MD	MSA/MD Name																
99999	MSA/MD NOT AVAILABLE	66	9390	66	0	0	0	57	9	64	2	26	4	33	0	3	0
20740	Eau Claire, WI	14	2490	14	0	0	0	13	1	14	0	7	0	7	0	0	0
15980	Cape Coral-Fort Myers, FL	1	345	1	0	0	0	1	0	1	0	1	0	0	0	0	0
29820	Las Vegas-Henderson-Paradise, NV	1	715	1	0	0	0	1	0	1	0	1	0	0	0	0	0
33460	Minneapolis-St, Paul-Bloomington, MN-WI	16	3640	16	0	0	0	16	0	16	0	4	2	8	0	2	0
31084	Los Angeles-Long Beach-Glendale, CA	2	1200	2	0	0	0	2	0	0	2	0	0	2	0	0	0
24220	Grand Forks, ND-MN	14	2150	14	0	0	0	13	1	14	0	9	0	4	0	1	0
Totals		114	19930	114	0	0	0	103	11	110	4	48	6	54	0	6	0

Home Mortgage Disclosure Act Institution Register Summary for 2023

Nationwide

Institution: 549300K1K5K5L0W6QR97

		Total Lars	Total Amount (\$000's)	CONV	FHA	VA	FSA	Site Built	Manu- factured	1-4 units	5+ units	Home Purchase	Home Improvemen	Refinancing	Cash-out Refinancing	Other Purpose	Purpose N/A
MSA/MD	MSA/MD Name																
99999	MSA/MD NOT AVAILABLE	42	6080	42	0	0	0	35	7	41	1	21	2	16	0	3	0
20740	Eau Claire, WI	6	680	6	0	0	0	6	0	6	0	2	1	2	0	1	0
33460	Minneapolis-St, Paul-Bloomington, MN-WI	6	1070	6	0	0	0	6	0	6	0	3	1	2	0	0	0
20260	Duluth, MN-WI	1	635	1	0	0	0	1	0	0	1	1	0	0	0	0	0
24220	Grand Forks, ND-MN	9	2955	9	0	0	0	7	2	8	1	1	2	5	0	1	0
Totals		64	11420	64	0	0	0	55	9	61	3	28	6	25	0	5	0

Home Mortgage Disclosure Act Institution Register Summary for 2024

Nationwide
Institution: 549300K1K5K5L0W6QR97

Home Mortgage Disclosure Act Institution Register Summary for 2024																	
Nationwide																	
Institution: 549300K1K5K5L0W6QR97																	
MSA/MD	MSA/MD Name	Total Lars	Total Amount (\$000's)	CONV	FHA	VA	FSA	Site Built	Manufactured	1-4 units	5+ units	Home Purchase	Home Improvement	Refinancing	Cash-out Refinancing	Other Purpose	Purpose N/A
33460	Minneapolis-St. Paul-Bloomington, MN-WI	3	955	3	0	0	0	3	0	3	0	3	0	0	0	0	0
24220	Grand Forks, ND-MN	4	230	4	0	0	0	4	0	4	0	3	0	1	0	0	0
99999	MSA/MD NOT AVAILABLE	14	3150	14	0	0	0	13	1	13	1	8	0	6	0	0	0
20740	Eau Claire, WI	3	145	3	0	0	0	3	0	3	0	1	0	2	0	0	0
Totals		24	4480	24	0	0	0	23	1	23	1	15	0	9	0	0	0

2024 Quarterly Loan to Deposit Ratio

DATE	RATIO
12/31/2023	95.40%
03/31/2024	98.12%
06/30/2024	96.35%
09/30/2024	93.18%
12/31/2024	89.89%

Unity Bank Loan and Deposit Product Services

Services	Consumer	Business
ONLINE BANKING & MOBILE BANKING		
MOBILE BANKING	X	X
ZELLE	X	
ONLINE BANKING	X	X
E STATEMENTS	X	X
ONLINE BILL PAY	X	X
REMOTE DEPOSIT CAPTURE		X
CASH MANAGEMENT		X
MERCHANT SERVICES		X
CARD SERVICES		
DEBIT/ATM CARD	X	X
VISA CREDIT CARD	X	X
CHECKING		
CLEAR CHECKING	X	
CONNECT CHECKING	X	
ULTIMATE CHECKING	X	
UBUSINESS		X
UBUSINESS PLUS		X
UBUSINESS ANALYSIS		X
SAVINGS		
UNITY SAVINGS	X	
UPGRADE MONEY MARKET	X	
UBUSINESS SAVINGS		X
UBUSINESS MONEY MARKET		X
CERTIFICATE OF DEPOSITS	X	X
IRAS	X	X
CDARS AND ICS PROGRAMS		X
HEALTH SAVINGS ACCOUNT	X	

Unity Bank Loan and Deposit Product Services

Services	Consumer	Business
LOANS		
HOME LOANS	X	
TERM LOANS	X	
FIRST-TIME HOME BUYER LOANS	X	
CONSTRUCTION LOANS	X	
LOT LOANS	X	
CONDO FINANCING	X	
GOVERNMENT LOAN PROGRAMS	X	
SECONDARY MARKET PROGRAM	X	
LOT LOANS	X	
HOME EQUITY	X	
TERM LOANS	X	
HELOC'S	X	
FHA TITLE I	X	
VEHICLE LOANS	X	X
RV, MOTORCYCLE, RECREATIONAL VEHICLE	X	X
BOAT	X	
CHECKING RESERVE	X	X
SBA		
7A		X
EXPRESS		X
504		X
COMMERCIAL LOANS		
WORKING CAPITAL LOC		X
TERM LOANS		X
LETTERS OF CREDIT		X
SINGLE PAY LOANS		X
AGRICULTURAL LOANS		
OPERATING LOC'S		X
MACHINERY		X
LIVESTOCK		X
FARM REAL ESTATE		X
FARM FACILITY AND IMPROVEMENT LOANS		X
GOVERNMENT PROGRAMS		X
RURAL FINANCE AUTHORITY		X
USDA FARM SERVICE AGENCY		X
FARMER MAC		X