

## **Community Reinvestment Act-Serving Our Community**

Normally, lending relationships are to be restricted to individuals and companies located in or operating in the geographic area serviced by the bank. Any lending outside the bank's designated service area is an exception to policy and must be justified based upon a long-term profitable and safe relationship with the bank. A primary objective of the bank is for loan officers to strive to build a total banking relationship with each customer. In doing so, the importance of the relationship between the credit function and other functions of the bank cannot be overemphasized. The primary consideration in extending credit is the creditworthiness of the applicant.

The bank is dedicated to servicing the credit needs of all the communities it serves, including low- and moderate-income neighborhoods, consistent with safe and sound banking practices and consistent with the principles embodied in the Community Reinvestment Act. Lending personnel are to be familiar with the bank's CRA policy and conduct business in accordance with that statement. Loan officers are to actively seek opportunities to make the bank's credit products equally available to all segments of the bank's communities.

In situations that clearly provide a distinct economic benefit to the bank's geographic trade area, including low- to moderate-income areas, the bank may use flexible underwriting standards that may create exceptions to policy. These exceptions are to be clearly documented and justified. Examples include construction and/or term real estate loans to provide housing for the benefit of individuals with low to moderate income and extensions of credit to small businesses and farms in the bank's geographic trade area.

## COMMUNITY REINVESTMENT ACT NOTICE

The Federal Deposit Insurance Corporation (FDIC), under the Federal Community Reinvestment Act (CRA), evaluates our record of helping meet the credit needs of this community in a manner 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, and you are entitled to certain information about our operations and our performance under the CRA. You may review information regarding our branches, such as their locations, services provided, and products offered; and the public section of our most recent CRA Performance Evaluation prepared by the FDIC. Comments received from the public relating to our performance in helping meet community credit needs, along with our responses to those comments, are also available for your review. If we are operating under an approved strategic plan, you may have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for a CRA examination in that quarter. This list is available from the Regional Director, FDIC Division of Depositor and Consumer Protection, 300 S. Riverside Plaza, Ste. 1700, Chicago, IL 60606. You may send written comments about our performance in helping to meet community credit needs to Richard Boening, CEO, Sterling Bank, 427 2<sup>nd</sup> Street, Chetek, WI 54728 and the FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at [www.fdic.gov/regulations/cra](http://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 Sterling Bancorp, Inc., a bank holding company. You may request from the Community Affairs Office, Federal Reserve Bank of Mpls. 94 Hennepin Avenue, Minneapolis, MN 55401 an announcement of applications covered by the CRA filed by bank holding companies.

This statement was reviewed and adopted by the Bank's Board of Directors on January 23, 2024.

Duly adopted this 23<sup>rd</sup> day of January 2024.

  
Secretary of the Board